



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734

PSE.com

December 13, 2018

Heidi Bedwell, Environmental Planning Manager
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

**RE: South Bellevue Segment Energize Eastside – Historic and Cultural Resources
Conditional Use (File# 17-120556-LB)**

Dear Ms. Bedwell:

Puget Sound Energy, Inc. (“PSE”) submits the following letter to summarize our progress in assessing and, to the extent necessary, addressing potential impacts to cultural resources. The Energize Eastside Project Final Environmental Impact Statement (“EIS”) found that there are no protected archaeological sites at or adjacent to the Bellevue South Segment (as described in the EIS) and the sensitivity for these resources is very low. EIS at 4.7-12. The EIS further found that the South Segment contains or is adjacent to unevaluated historic resources, including potentially detached single family residences built in the 1950s and 1960s, a historic district, and the corridor itself. *Id.* The EIS explains that the eligibility of these resources will be evaluated by the Department of Archaeology and Historic Preservation (“DAHP”) and that, to the extent resources are eligible, it is probable that any impacts could be mitigated.

On June 21, 2017, PSE sent a letter to DAHP and potentially affected Tribes, notifying them of the project. A subsequent email on that day from PSE’s consultant Historical Research Associates, Inc. (“HRA”) transmitted an Area of Potential Effects (“APE”) cover letter, proposed archaeological inventory plan, as well as other relevant documents for DAHP’s review. The project was assigned DAHP Project number 2016-03-01689. PSE requested comments on the proposed APE and Archaeological Inventory Plan within 30 days. HRA contacted DAHP approximately a month later to ask about any comments on the APE and associated materials. Following additional email exchange, DAHP indicated that they would be awaiting contact from the U.S. Army Corps of Engineers (“Corps”), the federal lead on the Clean Water Act Section 404 permit that ultimately triggers review under Section 106 of the National Historic Preservation Act of 1966 (“NHPA”). PSE will pursue full consultation with DAHP under the State Environmental Policy Act (“SEPA”) after the Corps has formally defined the portion of the project under their jurisdiction.

This has not slowed PSE's progress in completing a full inventory of the corridor, including those areas subject to Corps jurisdiction, and in moving forward with other mitigation-related activities contemplated in the EIS. HRA drafted one cultural and historic resources report for the section of the project proposed for Corps jurisdiction. HRA drafted two cultural and historic resources reports for the segments of the alignment outside of the proposed area of Corps jurisdiction, which would be subject to SEPA. At this time, HRA has not identified any potential impact to resources recommended as eligible for the National Register of Historic Places ("NRHP") that cannot be mitigated. The following is a list of activities contemplated in the EIS and a summary of progress that PSE and their consultant (HRA) have taken to address those concerns, to date.

FEIS Cultural Resources Mitigation/Regulatory Requirements — Prior to Construction

- ✓ Develop resource-specific mitigation measures during consultation with DAHP, affected Tribes, KCHPP, and other appropriate stakeholders if a protected archaeological resource is identified during pre-construction archaeological survey or historic property inventory. (Regulatory Requirements)
 - HRA identified two archaeological sites during their survey for cultural resources: the Columbia and Puget Sound Railroad, which was previously recorded, and a foundation from the 1930s or 1940s.
 - The Columbia and Puget Sound Railroad site will be avoided by project activities.
 - The foundation site falls within Corps jurisdiction. HRA has recommended the site not eligible for listing in the NRHP. The Corps will review this recommendation during their Section 106 review. No action may be taken in this area until PSE has received required approvals from the Corps.
- ✓ Apply for an archaeological excavation permit from DAHP (WAC 25-48-060) if impacts to a protected archaeological resource cannot be avoided. (Regulatory Requirements).
 - The previously recorded railroad will be avoided by the project. The foundation is recommended by HRA as not eligible for listing in the NRHP. This recommendation will be addressed as part of the Corps Section 106 review.
 - If additional survey of access routes or access denial pole locations results in identification of a previously unidentified archaeological site(s) and impacts to that resource cannot be avoided, PSE will consult with required agencies and comply with this provision.
- ✓ Request an eligibility determination from DAHP for resources listed as eligible for listing in the NRHP (Eastside Transmission System, Somerset Neighborhood, Newcastle Cemetery, Mt. Olivet Cemetery, and the Columbia & Puget Sound Railroad). If any are determined eligible, mitigation measures specific to those resources will be developed during consultation with DAHP, affected Tribes, and any other appropriate stakeholders. (Regulatory Requirements)

- HRA recommended 37 resources individually eligible for listing in the NRHP. HRA also recommends 153 resources qualify for listing in the NRHP under Criterion C as contributing resources to one of three potential neighborhood historic districts through which the project's Area of Impacts (AI) passes: the Somerset neighborhood, Bridle Trails neighborhood, and Monthaven neighborhood.
 - HRA recommended that the only potential for significant impacts are to the Sammamish-Lakeside-Talbot Hill Transmission Lines #1 and #2.
 - Following further review HRA determined that while the replacement of the existing transmission lines will impact the transmission line itself, the impact will be minimized by PSE's decision to route the new lines through the existing transmission corridor, to typically place new transmission poles within 25 feet of existing poles, and to maintain the lines' original use and purpose. HRA recommends that the Project, as planned, will have no significant impact on historic architectural properties. If mitigation is required, HRA recommends a limited public education effort, including, potentially, public signage along the route or other means of sharing the history of the Eastside's electrification with the public.
 - Somerset was identified as potentially eligible for listing in the NRHP under Criterion C, as a midcentury neighborhood built by merchant builders and developers in a collection of architectural styles typical of the time. HRA determined that, as the neighborhood was designed around the existing transmission corridor, and PSE proposes to retain the original corridor, the neighborhood will also retain its existing relationship to the transmission lines. HRA recommends that the Project, as proposed, will retain the original transmission corridor and does not impact a potential Somerset neighborhood historic district or the contributing resources within it.
 - The Newcastle Cemetery is listed in the Washington Heritage Register. It is outside of, but adjacent to the AI for the project.
 - Mt. Olivet Cemetery is also outside of the AI.
- ✓ Obtain a Certificate of Appropriateness (COA) from KCHPP (KCC 20.62) if there are potential impacts to a designated KC Landmark. (Regulatory Requirements)
- HRA did not identify any designated KC Landmarks within the AI.
- ✓ Avoid cemeteries in accordance with state law (Chapters 68.60 RCW and 68.50 RCW).
- Property owned by the Sunset Hills Memorial Park encompasses a portion of PSE's corridor, where SAM-RIC proposed poles 6/4 through 6/7 are located. It appears that the developed cemetery is on property upslope to the east of the ROW and will not be impacted. It is also located in the North Bellevue segment and not part of the City's current CUP review process.
 - Additional cemeteries are outside of the ROW and so will not be impacted.
- ✓ Avoid graves outside of the dedicated boundaries of a cemetery in accordance with state law (Chapters 27.44 RCW and 68.60.050).

- There are no known graves outside the dedicated boundaries of a cemetery. Archaeological monitoring is recommended at pole locations on Sunset Hills Memorial Park property, in the vicinity of the Newcastle Cemetery, and adjacent to Greenwood Memorial Park.
 - HRA prepared an Inadvertent Discovery Plan (IDP) for the portion of the project under Corps jurisdiction.
 - HRA drafted a monitoring and inadvertent discovery plan (MIDP) for the portion of the project subject to the State Environmental Policy Act (“SEPA”). This MIDP will be revised based on the results of additional survey for access routes and access denial properties.
 - PSE will implement both plans and follow specified procedures to the extent any unmarked graves are encountered.
- ✓ Conduct a historic property inventory (field work is complete; resulting forms and associated report are being submitted to DAHP for review).
- HRA completed a historic property inventory for project resources both within and outside of the Corps’ jurisdiction.
 - Submission of these reports to DAHP will occur after the Corps has formally taken jurisdiction over their portion of the project. The Corps confirmed receipt of the application on November 26, 2018.
- ✓ Conduct archaeological resource surveys for the selected route that include subsurface testing (pedestrian and subsurface survey of the 16-mile alignment and specific proposed pole locations began in August 2017 and is still ongoing as of the writing of this [December 2017]; PSE will conduct a second pedestrian and subsurface survey to assess staging areas, laydown areas, stringing sites, and access roads once more information on these locations is available; as of this writing this has not started).
- The initial archaeological survey was completed in October 2017.
 - Additional survey associated with the Richards Creek wetland mitigation, and stringing areas and access roads on the Richards Creek parcels was completed in August 2018.
 - PSE has submitted the Richards Creek report to the Corps (confirmation from Corps on November 26, 2018).
 - HRA returned to conduct survey of poles and access routes in the wetland south of the Sammamish Substation in October 2018.
 - Upon selection of the construction contractor, PSE will survey of access routes, stringing locations, and access denial properties as appropriate.
- ✓ Consult with DAHP and any other appropriate stakeholders to develop resource-specific mitigation measures for impacts to significant cultural resources.
- Consultation with DAHP under Section 106 and SEPA will occur during the Corps’ Section 106 review.
- ✓ Preserve or add screening at proposed pole sites to minimize potential impacts to the viewsheds of historic cemeteries.

- This mitigation option will be considered by DAHP during their review.
- ✓ Adjust the proposed pole locations to reduce potential direct impacts to historic cemeteries.
 - At this time, there are no poles that are expected to directly impact historic cemeteries. As set forth above, the only impacts are to lands adjacent to historic cemeteries.
- ✓ If the selected alternative presents potential operational impacts to eligible or listed historic properties, mitigation measures would depend upon the nature of the property and the characteristics contributing to its significance. If impacts to a designated King County Landmark are proposed, the project will be subject to the COA process with the King County Landmarks.
 - HRA did not identify any designated KC Landmarks within the AI.
- ✓ Operational impacts to aboveground resources may include noise, vibration, and views. The impacts to each identified historic resource will need to be assessed individually to determine mitigation measures, which may include redesign options or measures to minimize noise and vibration impacts.
 - The FEIS did not identify any potential significant noise or vibration impacts to South Bellevue cultural resources. *See* Energize Eastside Project Phase I Draft EIS at Ch. 9.1.

FEIS Cultural Resources Mitigation/Regulatory Requirements — During Construction

- Develop mitigation measures during consultation with DAHP, affected Tribes, and any other appropriate stakeholders if a protected archaeological resource is identified during construction. In accordance with RWC 27.53, an archaeological resource identified during construction is protected until DAHP determines whether it is eligible for listing in the NRHP. (Isolated (single) artifacts, either precontact or historic, are not protected because they do not meet the definition of a “site” under state law (WAC 25-48-020(9)).
 - HRA prepared an IDP for the portion of the project under Corps jurisdiction.
 - HRA drafted a monitoring and inadvertent discovery plan (MIDP) for the portion of the project subject to SEPA. This MIDP will be revised based on the results of additional survey for access routes and access denial properties.
- Follow procedures dictated by state law (RCW 27.44) if human skeletal remains are discovered.
 - PSE is aware of and will comply with this law.
- Obtain an excavation permit from DAHP if unmarked graves would be disturbed.
 - PSE is aware of and will comply with this law.
- Follow the procedures identified in the IDP if any cultural resources are encountered during construction.

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- PSE will implement both plans and follow specified procedures to the extent any unmarked graves are encountered.

Please let me know if you need any additional information on PSE's cultural resource planning and consultations.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Strauch".

Brad Strauch
Senior Land Planner