



Port of Vancouver USA  
A CENTURY OF POSSIBILITIES.

October 4, 2012

Fran Sant  
SEPA Rule Coordinator  
Washington Department of Ecology  
PO Box 47600  
Olympia, WA 98504

Dear Ms. Sant:

As a State Environmental Policy Act (SEPA) lead agency, the Port of Vancouver, USA (port) would like to provide comment on the preliminary draft SEPA rule revisions. We appreciate the opportunity to submit these comments and look forward to updates the SEPA thresholds and checklist that make it an effective tool for environmental stewardship and development in Washington State.

**Conceptual Alternatives: Proposals A and B**

While we appreciate the committee's efforts to provide multiple alternatives, it appears that a hybrid approach to these alternatives makes the most sense. Why not raise the current optional thresholds to those in Proposal B, essentially replacing Tier 1 in Proposal A with Proposal B, *and* retain the Tier 2 concept in Proposal A? This update is intended to modernize SEPA and update exemption thresholds. The current exemption thresholds are too low. They should be raised without additional undue process.

**WAC 197-11-800(23)(c): Electrical Facilities Thresholds**

The port agrees that the associated SEPA voltage threshold should be increased to 115,000 volts or less. However the added language limiting the area to which electrical facilities would meet the exemption to only within existing improved right-of-way and developed utility corridors is problematic for certain types of development where impacts from such construction would be negligible .

The port would like to either suggest raising the exemption threshold to 115,000 volts with no limitations on geography, or keeping the current 55,000 volts without geographical limitations and adding the language to increase specific geographical locations to 115,000 volts. If the committee chooses the latter, the port would also suggest including "developed industrial sites" to the list of geographical acceptations. This would address the concern about new cross country utility corridors without unduly burdening redevelopment of industrial sites that may require their own internal power lines.

The port supports Ecology's efforts to improve the SEPA process and applauds the committee's efforts to streamline SEPA and update exemption thresholds. Thank you for the opportunity to comment on this preliminary draft amendment. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Willis".

Lisa Willis  
Environmental Project Manager