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Community Planning & Development  
9611 SE 36<sup>th</sup> Street  
Mercer Island, WA 98040  
(206) 275-7605  
[Epermit.tech@mercerisland.gov](mailto:Epermit.tech@mercerisland.gov)

**RE: Boring for Submarine Cable Thermal Testing – Shoreline Exemption**

To Whom It May Concern:

PSE is seeking a *shoreline exemption* for our proposal to conduct in-water exploratory boring to test the thermal properties of the soil at the Barnabie and Flood Cable Stations. Boring at Locations H and J would be located in Lake Washington between Mercer Island and Bellevue/Mercer Island and Renton (respectively – see enclosed materials for further detail). PSE is proposing to complete geotechnical survey activities to evaluate site conditions in order to design replacement cable crossings that will be completed as separate projects in the future. The thermal survey work is needed to analyze site conditions and will be conducted by completing borings along the existing cable line.

The scope of work for this project is classified as *information collection, research, site exploration and investigation activities*. The location of the bore must be in the vicinity of the existing cable to appropriately gauge the thermal properties of the underlying soil ahead of cable replacement. Because this activity is related to a study associated with a future proposal, this project is exempt from SEPA review pursuant to WAC 197-11-800(17). Because the proposed activity meets the criteria listed below, this project is also exempt from the substantial shoreline development permit requirement of Mercer Island's Shoreline Master Program (WAC 173-27-040(m)).

- The activity does not interfere with normal public use of surface waters.
- The activity will have no significant adverse impact on the environment, including but not limited to fish, wildlife, fish or wildlife habitat, water quality, and aesthetic values.
- The activity does not involve the installation of any structure, and upon completion of the activity the vegetation and land configuration of the site will be restored to conditions existing before the activity.
- The activity is not subject to the permit requirements of RCW 90.58.550, as the project does not relate to oil or natural gas exploration in marine waters.

All borings will be completed in PSE-owned easements and properties. Boring locations H and J will both be accessed from a barge. The method of the bore will be a vertical sample collection using a hollow-stem auger. No more than 0.55 square feet of ground disturbance will occur from the hollow-stem auger (10 inch diameter) at each bore location. The outer casing of the hollow-stem auger will encase the rod that is driven down to collect the sample, so turbidity will not be able to escape during the bore work. The bore will be driven to a depth of up to 50 feet below the floor bottom at bore locations H and J, and drilling fluid generated during the bore will be collected into containment drums on the barge for disposal at an appropriate upland location once work is complete. Once cores are collected, the bore

holes will be filled with approximately 4 cubic yards of grouting material (bentonite clay) in accordance with Washington State Department of Ecology (Ecology) requirements.

Adverse effects are not anticipated from this project due to the minimal disturbance and short-term duration. Impact minimization measures for this project include the use of BMPs for sediment control. During the sampling impacts to water quality are not expected due to the containment of sampling fluids and cuttings within the casing and the minor amount of potential sediment disturbance. There is a slight potential for minor sedimentation of the water directly beneath and immediately adjacent to the barge due to the placement and removal of the barge anchors and the containment casing. To reduce the potential for spills and leaks, the work crew on the barge will have an adequate supply of tools (vacuum pump, booms, diapers, and other absorbent material) to control and contain deleterious materials in the event of an accidental fill. Additionally, vehicles and equipment will be inspected daily for fluid leaks prior to the start of each workday.

If you have any questions, please feel free to contact me at [dylan.marcus@pse.com](mailto:dylan.marcus@pse.com).

Sincerely,

**Dylan Marcus (He/Him)**

Associate Municipal Land Planner

6500 Ursula Place South | Seattle, WA 98108

(206) 716-2754 (office) | (206) 225-7568 (cell)

[Dylan.Marcus@pse.com](mailto:Dylan.Marcus@pse.com)