

**From:** [Nora Kammer](#)  
**To:** [EFSEC mi Comments](#)  
**Cc:** [Brenda Clifton](#); [atrain@swinomish.nsn.us](mailto:atrain@swinomish.nsn.us); [Lily Eriksen](#); [Arianna Lapke](#); [Bridget Moran](#); [Scott Morris](#)  
**Subject:** Goldeneye BESS - comments from SRSC  
**Date:** Thursday, July 18, 2024 9:54:35 AM

---

External Email

To whom it may concern:

I submit these comments from the Skagit River System Cooperative (SRSC), a tribal consortium of the Sauk-Suiattle Indian Tribe and the Swinomish Indian Tribal Community, on behalf of our two member tribes. These comments are in relation the Goldeneye BESS application submitted to EFSEC, proposing a standalone battery energy storage system sited near Sedro Woolley, Washington adjacent to Hansen Creek.

The project is sited adjacent to Hansen Creek, an important salmon stream and tributary to the middle Skagit River. SRSC has engaged in nearly 20 years of habitat restoration activities just upstream from the project site. Significant acreages along the stream have been acquired by our member tribe (Swinomish) and restored for the benefit of salmonids and watershed processes. Along with numerous watershed partners, such as Puget Sound Energy, Skagit County, Upper Skagit Indian Tribe, and Skagit Fisheries Enhancement Group, the riparian areas along Hansen Creek are on a markedly upward trajectory for habitat values, while also significantly reduced drainage and flooding issues for neighboring properties. We take a keen interest in activities affecting Hansen Creek.

For this reason, at the behest of our member tribe (Swinomish), SRSC met virtually with the project team supporting the Tenaska/Goldeneye BESS project to discuss potential impacts to the stream. On June 26, myself as well as SRSC's botanist Brenda Clifton met virtually with a Tenaska team. We discussed the following topics:

1. The team indicated Tenaska's commitment to preserve a 200 foot buffer on Hansen Creek, including some infrastructure demolition and replanting and proposed to restore areas within the buffer. We discussed the weeds and blackberry along the stream channel.
2. We discussed the proposed horizontal direction drilling of utilities proposed for beneath Hansen Creek. I requested that the HDD be below the scour depth of Hansen Creek, so that there would be no eventual conflict with stream degradation endangering the buried utilities in such a way as to require eventual streambed armoring, which has negative impacts for salmonids. Tenaska agreed that this was already a priority, that the Geotech would provide a scour depth recommendation, and they expected a 'deep bore'. If implemented, this approach would satisfy this concern.

3. We also took the opportunity to express concern about the siting within the 100-year floodplain of the Skagit River and noted the antiquated (1980) flood maps in place in the Skagit which do not account for present day nor climate change conditions. The areas upstream of Sedro Woolley were heavily impacted by floodwaters in 2021 to the surprise of even longtime property owners, and it seems that watershed conditions, downstream development, and/or climate change may be aggravating flood conditions in the nearby reach of the Skagit River, with potential resulting impacts to flooding at the project site. I encouraged elevating the BESS cabinets above the 500-year floodplain to mitigate flooding impacts and hazards (flooding, fire, pollution) associated with flooded BESS facilities. There was no commitment to this, but the team acknowledged our concern.
4. Direct impacts to onsite wetlands would be mitigated at an off-site mitigation bank.

At the end of our discussion, the team indicated that they would be submitting permits with EFSEC promptly, which did occur the following day on 6/27.

This was a very encouraging conversation with project representatives, where our primary concern (impacts to Hansen Creek and its riparian buffer), seemed to be recognized with a response to not only avoid the 200-foot buffer area, but improve the buffer area.

Unfortunately, documentation for the project was submitted to EFSEC and uploaded for review did not fully represent the enhancement of the buffer that we had discussed. We reviewed Attachment C – Conceptual Planting Plan, but was disappointed to see the limited planting that was indicated within the Hansen Creek buffer area. After discussing the extensive blackberries lining the stream and the poor existing riparian conditions of the buffer area on 6/26, Brenda and I had both perceived buffer enhancement, not only buffer avoidance (other than the demolition areas of existing buildings/driveways within the buffer). We also made reply comments regarding species selection (increase conifer component).

In response to raising these concerns, Tenaska acknowledged the timing of EFSEC submittal had not yet allowed incorporating the planting elements discussed on 6/26, principally that buffer enhancement plan will include controlling non-native weeds and vegetation, that Tenaska will direct the landscape architect to include some conifers in the riparian area, and that Tenaska would like SRSC's input on that plan once it has been drafted. SRSC looks forward to reviewing a revised Attachment C for this project and discussing with the applicant.

We look forward to our concerns being addressed and incorporated into the project submittals filed with EFSEC.

Please get in touch if you have any questions or would like to discuss further.

**Nora Kammer**

Habitat Protection Program Director

Skagit River System Cooperative  
PO Box 368, La Conner, WA 98257  
Phone: 360.391.8472  
Fax: 360.466.4047

*SRSC's offices are open Monday through Thursday.*