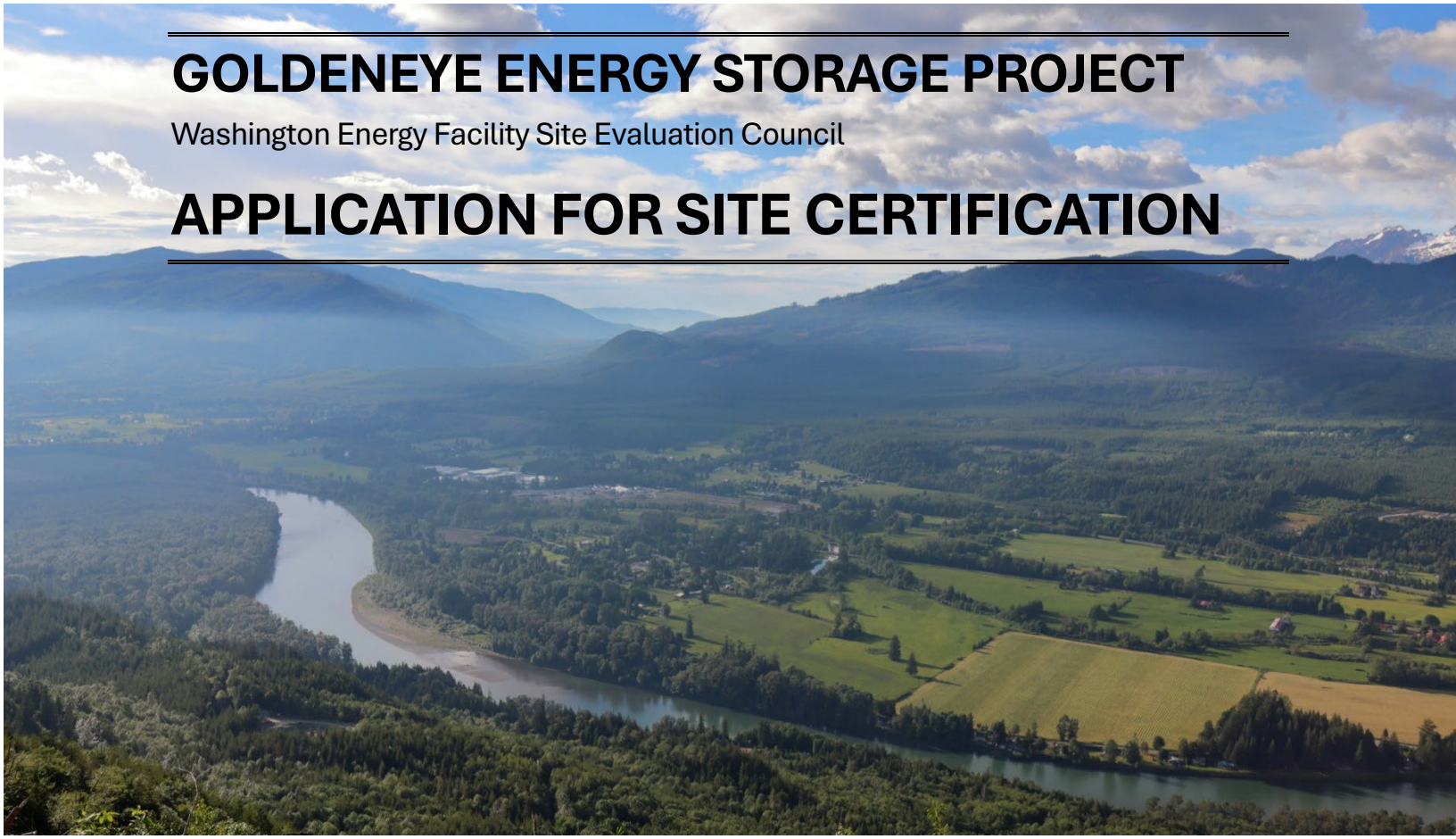

GOLDENEYE ENERGY STORAGE PROJECT

Washington Energy Facility Site Evaluation Council

APPLICATION FOR SITE CERTIFICATION

Submitted by:

Goldeneye Energy Storage, LLC
14302 FNB Pkwy
Omaha, NE 68154

JUNE 2024

CONTENTS

List of Tables

Attachments

Acronyms and Abbreviations

°F	degree Fahrenheit
AADT	average annual daily traffic
AASHTO	American Association of State Highway and Transportation Officials
AC	alternating current
Ag-NRL	Agricultural Natural Resource Lands
AHJ	Authority Having Jurisdiction
AMM	Avoidance and Minimization Measure
APDI	area of potential direct impacts
API	Area of Potential Impacts
Applicant	Goldeneye Energy Storage, LLC
AQI	Air Quality Index
ASC	Application for Site Certification
ASCE	American Society for Civil Engineers
ASOS	Automated Surface Observing Systems
BESS	battery energy storage system
BFE	base flood elevation
BLM	Bureau of Land Management
BMP	best management practice
BMS	battery management system
CAA	Clean Air Act
CadnaA	Computer Aided Noise Abatement
CAO	Critical Areas Ordinance
CAR	Critical Areas Report
CFR	Code of Federal Regulations
CO	carbon monoxide
County	Skagit County
CSWGP	Construction Stormwater General Permit
CWA	Clean Water Act
DAHP	Washington Department of Archaeology and Historic Preservation
dBA	A-weighted decibels
DC	direct current
DNR	Washington State Department of Natural Resources
DOE	Department of Energy
Ecology	Washington State Department of Ecology
EDNA	Environmental Designation for Noise Abatement
EFH	essential fish habitat

EFSEC	Energy Facility Site Evaluation Council
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
FE	federally endangered
FEMA	Federal Emergency Management Agency
FT	federally threatened
FTA	Federal Transit Administration
gen-tie	generation tie
GHG	greenhouse gas
HMI	Human Machine Interface
HV	high voltage
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
IBC	International Building Code
IDP	inadvertent discovery plan
IFC	International Fire Code
IPaC	Information for Planning and Consultation
ISO	International Organization for Standardization
JARPA	Joint Aquatic Resource Permit Application
KOP	key observation point
kV	kilovolt
Leq	sound energy equivalent level
LID	Low Impact Designation
LOS	level of service
MOVES4	Motor Vehicle Emissions Simulator
MV	medium voltage
MW	megawatt
MWh	megawatt-hour
NAAQS	National Ambient Air Quality Standards
NFPA	National Fire Protection Association
NO2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Adminstration
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSCEP	National Service Center for Environmental Publications
O&M	operations and maintenance
OSHA	Occupational Safety and Health Administration

PEM	palustrine emergent
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
POI	point of interconnection
Project	Goldeneye Energy Storage Project
PSD	Prevention of Significant Deterioration
PSE	Puget Sound Energy
PUD	Public Utility District
PVC	polyvinyl chloride
RCW	Revised Code of Washington
REC	recommended environmental condition
ROC	Remote Operations Center
RRv	Rural Reserve
SC	state candidate
SCC	Skagit County Code
SCCP	Skagit County Comprehensive Plan
SE	state endangered
SEPA	State Environmental Policy Act
SMMWW	Stormwater Management Manual for Wester Washington
SO_2	sulfur dioxide
SPCC	spill prevention, control, and countermeasures
SR	Washington State Route
SWMMWW	Stormwater Management Manual for Western Washington
SWPPP	stormwater pollution prevention plan
TCDS	Traffic Count Database System
UL	Underwriters Laboratories
UPS	uninterruptible power supply
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WDNR	Washington Department of Natural Resources
WISAARD	Washington Information System for Architectural and Archeological Records Data
WNHP	Washington Natural Heritage Program
WSDOT	Washington State Department of Transportation

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Part 1 – Overview/Summary

A. Basic Information

A.1. Applicant

Name/Contact:	Goldeneye Energy Storage, LLC / Tommy Nelson		
Mailing address:	14302 FNB Pkwy, Omaha, NE 68154		
Phone:	949-910-1623	Fax:	N/A
Email:	tnelson@tenaska.com		

A.2. Preparer (if different from applicant)

Name/Contact:	Tetra Tech/Linnea Fossum		
Mailing address:	1750 S Harbor Way, Suite 400, Portland, OR 97201		
Phone:	(503) 727-8062	Fax:	N/A
Email:	Linnea.Fossum@tetratech.com		

A.3. Property Owner and Location of Proposed Site Use Cross Reference to identify parcels on provided map of site in Part 2.A.4.

Property Owner / Leased?	Address					Contact Information (Email or Phone number)	Public Land Survey System	Legal Description	Cross Reference for map
	Street	City	State	Zip	County				
JOHN F. GRINDER	25080 MINKLER ROAD	SEDRO WOOLLEY	WA	98284	SKAGIT	(360) 421-9967	T55N R05E S20 Parcel ID 40030	(14.1400 ac) THAT PORTION OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 20, TOWNSHIP 35 NORTH, RANGE 5 E W.M., LYING SOUTHERLY OF THE STATE HIGHWAY RIGHT OF WAY, (FORMERLY THE FAIRHAVEN AND SOUTHERN RAILROAD RIGHT OF WAY) AND EASTERLY OF HANSON CREEK.	Property A or 1
JON E. FLEURICHAMP	N/A	SEDRO WOOLLEY	WA	98284	SKAGIT	(360) 856-6063	T35N R05E S20 PARCEL ID 40042	(6.6000 ac) THAT PORTION OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 20, TOWNSHIP 35 NORTH,	

								RANGE 5 EAST W.M., NORTHEAST OF HANSON CREEK.	
PUGET SOUND ENERGY ELEC	N/A	SEDRO WOOLLEY	WA	98284	SKAGIT		T35N R05E S20 Parcel ID 40045	(15.8600 ac) THAT PORTION OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 20, TOWNSHIP 35 NORTH, RANGE 5 E W.M., LYING SOUTH OF HANSON CREEK.	
PUGET SOUND ENERGY ELEC	N/A	SEDRO WOOLLEY	WA	98284	SKAGIT		T35N R05E S20 Parcel ID 40046	(11.6900 ac) THAT PORTION OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 20, TOWNSHIP 35 NORTH, RANGE 5 E W.M., LYING SOUTH OF HANSON CREEK.	
PUGET SOUND ENERGY ELEC	N/A	SEDRO WOOLLEY	WA	98284	SKAGIT		T35N R05E S20 Parcel ID 40022	(8.7800 ac) THAT PORTION OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 20, TOWNSHIP 35 NORTH, RANGE 5 E W.M., LYING SOUTH OF HANSON CREEK.	

B. Project Summary

Goldfinch Energy Storage, LLC (Applicant) proposes to construct and operate the Goldeneye Energy Storage Project (Project) in unincorporated Skagit County, Washington Figure 1 in Attachment A). The Project is a stand-alone 200-megawatt (MW)/800-megawatt hour (MWh) battery energy storage system (BESS), with related interconnection and ancillary support infrastructure.

The Project will not generate electricity, but instead provide a buffer for Skagit County's (County) electrical grid. The Project will accomplish this by receiving energy (charging) from the Puget Sound Energy (PSE) electric transmission system, storing energy on site, and then later delivering energy (discharging) back to the point of interconnection. The Project will also assist the State of Washington in meeting its goal of a greenhouse gas emission free electricity supply by 2045 by reducing the need to build new emitting energy facilities to meet peak demand.

The Project will primarily consist of BESS units, which comprise batteries installed in purpose-built enclosures. Ther enclosures will contain battery cells grouped together in modules, which are placed in racks, with a battery management system for automated monitoring and managing of the batteries to ensure design performance. In addition to the BESS units and their associated equipment (e.g., inverters, transformers, underground collection cabling), the Project will include a substation, underground 230-kilovolt (kV) transmission line, and maintenance and parking areas. The Project components are further described in Part 2, Section A.2.3.

The Project will interconnect with the existing PSE Sedro-Woolley Substation, located approximately 625 feet southwest of the Project site, via the new underground 230-kV transmission line. Generally, the Project site will be accessed using U.S. Interstate Highway 5 (I-5), Washington State Route (SR) 20, and Minkler Road. Additionally, Hoehn Road can provide access to the existing PSE Sedro-Woolley Substation and the transmission line corridor, as needed. The Project will be secured with an eight-foot-tall pre-cast concrete panel wall and gates to provide access inside the site, from the three new access points to be constructed off Minkler Road. The Project substation will be enclosed by chain link fence with three strands of barbed wire at the top, to prevent unauthorized access to high-voltage electrical equipment.

The Project's construction is anticipated to begin in August 2025, with a Commercial Operations Date planned for October 2026.

C. Site Summary

The Project is located off Minkler Road just outside the eastern edge of Sedro-Woolley, within the Skagit Valley, less than one mile north of the Skagit River. The Project Area, which accounts for the total permanent footprint of the Project, will encompass approximately 16 acres across the five parcels (see Figure 2 in Attachment A). The main parcel (P40030), where the BESS units are located, is owned by John F. Grinder. The underground transmission line is located on parcels owned by Jone E Fleurichamp (P40042) and PSE (P40046). The access road is located on a portion of Parcel 40046, and parcels P40022 and P40047, all owned by PSE. The upgraded segment of water line is currently sited and will remain sited entirely within the Minkler Road right-of-way.

All Project parcels are zoned as Agricultural Natural Resource Lands (Ag-NRL). The portion of Minkler Road right-of-way, where the upgraded water line is located, is zoned both Ag-NRL and Rural Reserve (RRv). The Project Area is primarily undeveloped and currently includes pasture fields, with a small section of scrub/shrub habitat present near the southeastern corner. A portion of the Project Area encompasses four existing structures, which the underlying landowner has agreed to demolish as part of Project construction.

The Project Area is mostly flat, though it contains areas of wetlands and frequently flooded areas; note that Project infrastructure will be elevated above the flood depth in accordance with the Site Grading Plan (Figure C2-1 in Attachment B). The Project Area is mostly within the mapped Federal Emergency Management Agency (FEMA) floodplain. The Applicant understands that construction of the Project will require a Floodplain Development Permit. The Applicant has completed habitat and wildlife surveys, wetland delineation, and archaeological resource surveys of the Project Area. The survey reports are provided as attachments to this application and a summary of findings is included here.

The Project Area contains Critical Areas as defined by Skagit County's Critical Areas Ordinance (see Attachment J, Critical Areas Report). Approximately 1.47 acres of wetlands were identified within the Project site and generation tie (gen-tie) alignment. Riverine wetlands along the gen-tie alignment will not be impacted by Project construction and operation because the gen-tie line will be directionally drilled underneath Hansen Creek and associated wetlands. However, approximately 1.18 acres of depressional wetlands delineated within the energy storage area will be permanently impacted. Impacts to these wetlands will be mitigated as described in the attached Joint Aquatic Resource Permit Application (JARPA; see Attachment Q).

The vegetation communities and land cover type present within the Project site include cultivated cropland, pasture and hay, temperate Pacific freshwater emergent marsh, north Pacific shrub swamp, and north Pacific lowland riparian forest and shrubland. Based on a literature review and field surveys, the Project site contains habitat that may be suitable for Townsend big-eared bat communal roosts (habitat/species of local importance; Skagit County Code [SCC] 14.24.500). However, biologists did not observe any signs of bats including urine/guano during site surveys. In addition, the western toad, a state candidate species, has the potential to occur within the Project site. Focused surveys for this species were conducted and no western toads were observed. No federally or state listed plant species, or other sensitive plants, were identified as having known occurrences or potential to occur within the Project Area or within 5 miles of the Project Area.

The Applicant's contractor, Dudek, conducted a cultural resources inventory in 2023-2024 (see Attachment E). Of the 22 built environment resources identified within the Area of Potential Impacts (API), only one is recommended eligible for the National Register of Historic Places (NRHP). The Bonneville Power Administration Transmission Line Monroe-Custer No. 2 is recommended to be eligible for the NRHP but the Project will not adversely affect this resource. One archaeological resource was identified during surveys. This resource, a historic agricultural equipment cache and subsurface historic refuse scatter, is located in an area that is no longer being considered by the Project and therefore impacts will be avoided by Project-related disturbances.

Construction is expected to last 14 months for a targeted in-service date of October 2026. Dust and stormwater management and mitigation plans will be developed in consultation with the Washington State Department of Ecology (Ecology) and in accordance with Skagit County requirements.

D. List of Studies

Note to applicant:

- This is an active, changing list and on-going focus for discussion.
- This information must match the information in Part 4.
- This information is critical to the pre-application stage.

Report No.	Topic	Name of Report and Location for Review	Status (e.g., scoping, contracting for, started)	Date of Completion (past or expected)	Included with Submittal? (Yes/No)
Attachment B	Earth	Civil Engineering Plans	Completed	February 2024	Yes
Attachment C	Landscaping	Conceptual Planting Plan	Completed	May 2024	Yes
Attachment D	Decommissioning	Decommissioning Summary	Completed	June 2024	Yes
Attachment E	Archaeological, Historical, and Cultural	Cultural Resources Inventory (Confidential)	Completed	June 2024	No
Attachment G	Earth	Geotechnical Engineering Report	Completed	June 2023	Yes
Attachment I	Socioeconomic Impact	Socioeconomic Impact Assessment	Completed	March 2024	Yes
Attachment J	Critical Areas (including Vegetation and Wildlife, and Wetlands and Surface Waters)	Critical Areas Report	Completed	June 2024	Yes
Attachment K	Stormwater	Flood Study – Hansen Creek	Completed	April 2024	Yes
Attachment L	Environmental Health	Phase 1 Environmental Site Assessment	Completed	April 2022	Yes
Attachment M	Environmental Health	Phase 2 Environmental Site Assessment	In progress	Anticipated July 2024	Yes
Attachment N	Fire	Fire Protection Plan	Completed	April 2024	Yes
Attachment O	Noise	Operational and Construction Noise Analysis	Completed	April 2024	Yes
Attachment P	Visual and Aesthetics	Visual Impact Assessment	Completed	May 2024	Yes

E. List of Stakeholders

Note to applicant:

- This is an active, changing list and on-going focus for discussion.
- This information is critical to the pre-application stage.

Type	Specific*	Contact (name, program)	Address / Contact Information	Areas of discussion	Status of engagement**
State Government	Department of Archaeology and Historic Preservation (DAHP)	Lance Wollwage Archaeological Unit	1110 S. Capitol Way, Suite 30 Olympia, WA 98501 (360) 890-2616 Lance.Wollwage@dahp.wa.gov	Project Impacts	Ongoing Engagement
Land owner	John and Dena Fleurichamp	N/A	(360) 856-6063	Project Impacts	Ongoing Engagement
Other	PSE	N/A	N/A	Project Offtake	Ongoing Engagement
Tribal Government	Upper Skagit Indian Tribe	The Honorable Marilyn M. Scott Tribal Chairwoman Scott Schuyler Cultural Resources	25944 Community Plaza. Sedro-Woolley, WA 98284	Project Impacts	Ongoing Engagement
Tribal Government	Samish Indian Nation	The Honorable Tom Wooten Tribal Chairman Jackie Kerry Tribal Historic Preservation Officer	2918 Commercial Ave. Anacortes, WA 98211	Project Impacts	Ongoing Engagement
Tribal Government	Tulalip Tribes of Washington	The Honorable Teri Govin Tribal Chairwoman Richard Young Cultural Resources	6410 23rd Avenue NE Tulalip, WA, WA 98271	Project Impacts	Ongoing Engagement
Tribal Government	Swinomish Indian Tribal Community	The Honorable Steve Edwards Tribal Senate Chair Josephine Jefferson Tribal Historic Preservation Officer	11430 Moorage Way La Conner, WA 98257	Project Impacts	Ongoing Engagement
Tribal Government	Stillaguamish Tribe of Indians	Eric White Tribal Chairman Kerry Lyste Tribal Historic Preservation Officer	236th St NE Arlington, WA 98223	Project Impacts	Ongoing Engagement

Tribal Government	Snoqualmie Indian Tribe	The Honorable Robert de los Angeles Tribal Council Chairperson Steven Moses Archaeology and Historic Preservation Adam Osbekoff Cultural Resource Policy Manager	PO Box 969 Snoqualmie, WA 98065	Project Impacts	Ongoing Engagement
Tribal Government	Sauk-Suiattle Indian Tribe	Nino Malto Vice Chair Kevin Joseph Tribal Historic Preservation Officer	5318 Chief Brown Lane Darrington, WA 98241	Project Impacts	Ongoing Engagement
Tribal Government	Lummi Nation	The Honorable Anthony Hillaire Lummi Nation Chairman Lena Tso Tribal Historic Preservation Officer Tamela Smart Deputy Tribal Historic Preservation Officer	2665 Kwina Road Bellingham, WA, 98226	Project Impacts	Ongoing Engagement
Tribal Government	Confederated Tribes of the Colville Reservation	The Honorable Andy Joseph, Jr Business Council Chair Guy Moura Tribal Historic Preservation Officer Crystal Miller SEPA	PO Box 150 Nespelem, WA, 99155	Project Impacts	Ongoing Engagement
Local Government	Skagit County	Peter Browning County Commissioner for Skagit County District 2 Ron Wesen Skagit County Commissioner		Project Impacts	Ongoing Engagement
Local Government	Port of Skagit	Sara Young Executive Director Steve Omdal Port of Skagit Commissioner, District 2		Project Impacts	Ongoing Engagement

* Entities typically consulted include Ecology, WDFW, DNR, DAHP, tribal governments, the Department of Defense, neighboring landowners, local government, etc. Not all of these may be required for each project but should serve as a starting point for applicant contacts for coordination.
** For example: Intend to contact, contacted, ongoing engagement, engagement complete.

F. Applicant Avoidance and Minimization Commitments Summary

F.1. Earth

Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Implementation of Geotechnical Recommendations	The Applicant will follow all geotechnical recommendations provided in the Geotechnical Engineering Report (Attachment G). Recommendations in Section 5.0 of the Geotechnical Engineering Report (Attachment G) include the following. **Ground Surface and Subgrade Preparation.** Clearing and stripping depths across the site are anticipated to be from 12 to 18 inches, and approximately 5 feet of fill is anticipated. On-site silty and sandy soils are not suitable for structural fill due to moisture conditions and compaction limitations (Attachment G). Stripping, fill, and compaction will be conducted to address silty and sandy soils and provide stability for shallow foundations. Subgrades across the site must be thoroughly compacted to a uniformly firm and unyielding condition before placing structural fill. If soft or otherwise unsuitable subgrade areas are revealed during evaluation that cannot be compacted to a stable or uniformly firm condition, the unsuitable soils will be scarified, aerated, and recompacted, if practical; or the unsuitable soils will be removed and replaced with compacted structural fill. The subgrade preparation and compaction recommendations in Sections 5.1 and 5.2 of the Geotechnical Engineering Report (Attachment G) will be followed to mitigate the risks associated with shallow foundations and seismic hazards. **Fill and Compaction.** The workability of material for use as structural fill will depend on the gradation and moisture content of the soil. It is recommended that washed crushed rock or select granular fill, as described below, be used for structural fill during wet weather. If prolonged dry weather prevails during the earthwork phase of construction, materials	Part 4.A.D, Attachment G	EFSEC

	with a somewhat higher fines content may be acceptable. Weather and site conditions will be considered when determining the type of import fill materials purchased and brought to the site for use as structural fill. Material used for structural fill will be free of debris, organic contaminants, and rock fragments larger than 6 inches. For most applications, it is recommended that structural fill consist of material similar to "Select Borrow" or "Gravel Borrow" as described in Section 9-03.14 of the WSDOT Standard Specifications. To obtain proper compaction, fill soil will be compacted near optimum moisture content and in uniform horizontal lifts. The maximum allowable moisture content varies with the soil gradation and should be evaluated during construction. During fill and backfill placement, sufficient testing of in-place density will be conducted to check that adequate compaction is being achieved. Fill placed to raise site grades and materials under pavements and structural areas will be placed on subgrades prepared as previously recommended. Fill material placed below structures and footings will be compacted to at least 95 percent of the theoretical maximum dry density (MDD) per ASTM International (ASTM) D 1557. Fill placed deeper than 2 feet below pavement sections should be compacted to at least 92 percent of the MDD. Fill material placed in landscaping areas will be compacted to a firm condition that will support construction equipment, as necessary, typically around 85 to 90 percent of the MDD. **Seismic Hazards.** The Project seismic design will use Site Class E and the 2018 IBC as well as ASCE 7-16 including the seismic design parameters listed in Table 1 of Attachment G. These parameters are consistent with the Washington State Building Codes. The Project will comply with the current codes at the time of construction, demonstrating compliance with WAC 463-62-020. Deep foundations may be required for several structures as discussed in the groundwater paragraph below. In order to address liquefaction hazards, it is anticipated that augercast piles (for foundations) will be embedded below the liquefaction zones and into gravels between 35 and 40 feet below existing ground surface to account for potential		

	downdrag forces. A qualified geotechnical engineer will observe the drilling operations, monitor grout placement and volumes, and evaluate the adequacy of individual drilled shaft installations. Specific recommendations for augercast piles are provided in Attachment G. Attachment G also includes other options for case in-place foundation piles to address liquefaction hazard. The final Project design will address foundation design to meet liquefaction hazards. **Groundwater.** Groundwater was observed from 5 to 10 feet below ground surface (Attachment G). Groundwater extraction would not be required for Project slab foundations or excavations. In addition, fill will be placed to bring elevations up out of floodplain levels in associated Project infrastructure areas. Limited groundwater extraction would be required for directional drilling for the gen-tie conduit under Hansen Creek; and for deep foundations. Anticipated deep foundations include: 1) lightning protection masts, 2) overhead/underground conversion structure, 3) the control building could either be placed on a shallow foundation or concrete drilled piers, and 4) the soundwall - concrete drilled piers. The CSWGP would include specific requirements for handling extracted groundwater. It is noted that this potential groundwater extraction would be minimal and could be contained and hauled off-site to a public wastewater treatment facility. Deep foundations would be constructed to meet requirements for liquefaction hazard. **Erosion.** The Applicant will implement an Erosion and Sediment Control Plan (ESCP), a Construction Phase SWPPP, and an Operations Phase SWPPP, in compliance with local stormwater regulations. These plans will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The ESCP will include BMPs such as the appropriate use of silt fencing to avoid or eliminate runoff of contaminants. The SWPPPs will include BMPs from the Washington Department of Ecology's 2019 Stormwater Management Manual for Western Washington (SWMMWW) as well as relevant sections of Skagit County Code. Implementation of an ESCP will incorporate scheduling grading and construction to reduce exposure, re-vegetating or		

	mulching denuded areas, directing runoff away from exposed soils, decreasing runoff velocities, confining sediment to the Project site, and inspecting and maintain control measures frequently. In addition, per RCW 17.10.140, the Applicant will prepare and submit a Vegetation and Weed Management Plan to EFSEC for the control of noxious and problem weeds prior to construction. The plan will be implemented to revegetate temporarily impacted areas and minimize erosion. **Retaining Walls.** Retaining walls may be used for grade transitions at the perimeter of the structural fill pad area. The walls are estimated to range from 4 to 6 feet in maximum height. General design parameters for mechanically stabilized earth (MSE) retaining walls are that the design calculations conform to WSDOT Specification Section 6-13.3(2). MSE walls should be assumed to have minimum grid lengths of 4 feet if no taller than 6 feet. The wall subgrade soils will generally consist of native soils suitable for support of these types of walls, provided they are compacted in place and inspected by geotechnical personnel before founding the MSE walls. Provided the proposed structures at the site can withstand the anticipated liquefaction settlement, they may be satisfactorily supported on continuous wall and isolated column footings founded in the structural fill planned for the site. Exterior footings should be established at least 18 inches below the lowest adjacent grade. Interior footings can be founded a minimum of 12 inches below the top of the floor slab. Isolated column and continuous wall footings should have minimum widths of 24 and 18 inches, respectively. **Foundations.** Based on the groundwater conditions in the site explorations and our understanding of the proposed footing elevations (bottom of footings established at or within a few feet of an approximately 5-foot increase in site grade), footing drains are not necessary to maintain bearing support as provided in Attachment G. However, because of the potential for near-surface seepage during wetter times of the year and from irrigation and potential landscaping, footing drains should be considered to maintain drier conditions around the structure and to reduce groundwater seepage that could migrate below the building slab. Deep foundations were		

	previously discussed in the seismic hazards and the groundwater paragraphs above. **Roads.** Section 6.0 of Attachment G provides recommendations for pavement design. **Building Permits.** The Applicant will provide grading plans and obtain necessary building permits from Skagit County Planning and Development Services if needed.		
F.2. Air Quality			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Implementation of BMPs and Standard Construction Practices	WAC sections addressing air quality include: • WAC 173-400-040(3) Fallout • WAC 173-400-040(4-4a) Fugitive emissions • WAC 173-400-040(5) Odors • WAC 173-400-040(9)(a) Fugitive Dust To adhere to these codes, the Applicant would implement BMPs and standard construction practices, including the following: • Vehicles and equipment used during construction would be properly maintained to minimize exhaust emissions. • Operational measures such as limiting engine idling time and shutting down equipment when not in use would be implemented. • Watering or other fugitive dust-abatement measures would be used as needed to control fugitive dust generated during construction. When applied, the Applicant will use water or a water-based environmentally safe dust palliative such as lignin for dust control. • Construction materials that could be a source of fugitive dust would be covered when stored. • Traffic speeds on unpaved roads would be limited to 25 miles per hour to minimize generation of fugitive dust. • Truck beds would be covered when transporting dirt or soil. • Carpooling among construction workers would be encouraged to minimize construction-related traffic and associated emissions.	Section 4.B.D	N/A

	• Erosion-control measures would be implemented to limit deposition of silt to roadways, to minimize a vector for fugitive dust. Replanting or graveling disturbed areas would be conducted during and after construction to reduce wind-blown dust.		
F.3. Water Quality – Wetland and Surface Waters			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Avoidance	The proposed Project will avoid impacts to Hansen Creek. The area adjacent to Hansen Creek, but outside of the 200-foot buffer, will be revegetated with native plants per the landscape plan currently being prepared for the Project. The conceptual planting plan is provided as Attachment C to this ASC.	Part 4.C.D; Attachment C, Attachment J, Attachment Q	N/A
Mitigation	Complete avoidance to wetlands and their associated buffer is not feasible due to the constraints of the Project site and surrounding area, particularly regarding property ownership. Due to the necessity of proximity to the Sedro-Woolley Substation, this site was the only feasible option for this Project. Therefore, all 1.18 acres of wetlands delineated within the energy storage site will be permanently impacted. No off-site wetlands will be impacted. The Applicant considered on-site compensatory mitigation for wetland impacts; however, due to the site design, there was not sufficient space available on site for mitigation that will be ecologically feasible and likely to succeed. Following guidance in the Federal Rule [33 CFR Part 332], the Applicant explored the possibility of using a mitigation bank to compensate for impacts. There are two approved mitigation banks within Skagit County that currently have credits that could mitigate for Project impacts: Skagit Valley Environmental Bank and Nookachamps Mitigation Bank. The goal of the mitigation plan is to fully compensate for all wetland impacts associated with this Project through the purchase of mitigation credits at an agency-approved mitigation bank. The Applicant will pay the mitigation bank based on the determined credit amount. The Applicant is currently preparing a JARPA, and the final mitigation requirements will be addressed through that process. Based on mitigation ratios identified in the Skagit Valley Environmental Bank mitigation banking instrument, the Project Applicant	Part 4.C.D; Attachment Q	DOE

	proposes to purchase 1.029 acres of credits to offset impacts to Category III and IV wetlands.		
Avoidance and minimization measures	The general avoidance and minimization measures have been developed to avoid and minimize effects resulting from the proposed Project, particularly considering partially impacted features that are on the border of the site. Those will include, but are not limited to: • Worker Awareness Training • Construction Best Management Practices and Monitoring • Stormwater Pollution Prevention Plan • Erosion and Sediment Control Plan • Spill Prevention, Containment, and Countermeasure Plan • Fugitive Dust Control	Part 4.C.D; Attachment J, Attachment Q	Ecology
F.4. Water Quality – Stormwater Runoff			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Erosion and Sediment Control BMPs – Stormwater	A SWPPP, an ESCP and a Vegetation and Weed Management Plan will be prepared prior to construction. The SWPPP (for construction and operation) and the ESCP will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The SWPPP and the ESCP will include BMPs from Ecology's 2019 SWMMWW as well as relevant sections of the SCC. A Vegetation and Weed Management Plan will be developed prior to construction and implemented to revegetate temporarily impacted areas and minimize erosion and sedimentation during and after construction.	Part 4.E.D	Ecology
LID techniques	LID techniques are required to be implemented within the Project Area by the standards outlined in the following: a. SCC 14.32.140 Low Impact Development (LID) Techniques and Facilities b. 2019 SWMMWW Volume I Chapter 3 c. SCC 14.34.150 (2) General Standards for Special Flood Hazard Areas The application of LID techniques within the Project will seek to mitigate the impacts to the site as a result of the creation of impervious surfaces by aiming to maintain the hydrologic functionality of the landscape as far as possible at pre-	Part 4.E.D	Skagit County and Ecology

	alteration conditions. All relevant provisions and standards within the 2019 SWMMWW and the WSDOT Standard Specifications for Road, Bridge, and Municipal Construction Division 7 and 8 shall also be complied with to the extent feasible during the construction and implementation of stormwater management infrastructure.		
Wetland/surface waters impacts	SCC 14.24.250 describes various possible wetland alternative compensation projects that can be employed when impacts to existing wetlands cannot be avoided. As on-site avoidance or compensation to impacts towards wetlands within the Project Area is not feasible, off-site compensation measures shall be undertaken in the form of using an agency-approved mitigation bank to purchase mitigation credits. Specific mitigation requirements as part of aquatic resources mitigation and mitigation banking policies and statutes (Title 90 of Chapter 90.74 and RCW 90.84) shall be determined and achieved through the Washington SEPA process and in consultation with permitting agencies. Hansen Creek is designated as a Shoreline of the State and is therefore subject to the requirements and standards of the Shoreline Management Act. Permitting for compliance with the Act shall be achieved through the JARPA process. Additionally, stormwater discharges into Hansen Creek from the Project Area shall be controlled and treated to the extent feasible in accordance with applicable regulations and standards within the 2019 SWMMWW and Section 404 of the CWA, and per measures and BMPs outlined in the SWPPP and the ESCP. See Attachment J and Attachment Q for details of wetland impacts and proposed mitigation measures.	Part 4.E.D, Attachment J, Attachment Q	Skagit County and Ecology
Floodplain Developments	All development within the floodplain of Hansen Creek shall aim to conform to the standards within SCC Chapter 14.34, especially SCC 14.34.150 and 14.34.160 (3), and the IBC in order to mitigate any flood-related risks and minimize impacts to the floodplain. See Attachment K for a Flood Study of the Project Area.	Part 4.E.D; Attachment K	Skagit County
F.5. Water – Runoff, Stormwater, and Point Discharges			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Erosion and Sediment Control	A SWPPP, an ESCP, and a Vegetation and Weed Management Plan will be prepared prior to construction. The SWPPP (for	Part 4.G.D	Ecology

BMPs – Stormwater Runoff	construction and operation) and the ESCP will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The SWPPP and ESCP will include BMPs from Ecology's 2019 SWMMWW as well as relevant sections of the SCC. A Vegetation and Weed Management Plan will be developed prior to construction and implemented to revegetate temporarily impacted areas and minimize erosion and sedimentation during and after construction.		
LID techniques	LID techniques are required to be implemented within the Project Area by the standards outlined in the following: a. SCC 14.32.140 Low Impact Development (LID) Techniques and Facilities b. 2019 SWMMWW Volume I Chapter 3 c. SCC 14.34.150 (2) General Standards for Special Flood Hazard Areas The application of LID techniques within the Project will seek to mitigate the impacts to the site as a result of creation of impervious surfaces by aiming to maintain the hydrologic functionality of the landscape and seasonal stream as far as possible at pre-alteration conditions.	Part 4.G.D	Skagit County and Ecology
Stream Flow	Hansen Creek is designated as a Shoreline of the State and is therefore subject to the requirements and standards of the Shoreline Management Act. Permitting for compliance with the Act shall be achieved through the JARPA process. Additionally, stormwater discharges into Hansen Creek from the Project Area shall be controlled and treated to the extent feasible in accordance with applicable regulations and standards within the 2019 SWMMWW and Section 404 of the CWA and per measures and BMPs outlined in the SWPPP and the ESCP.	Part 4.G.D	Skagit County and Ecology
Wetland Impacts	SCC 14.24.250 describes various possible wetland alternative compensation projects that can be employed when impacts to existing wetlands cannot be avoided. As on-site avoidance or compensation to impacts towards wetlands within the Project Area is not feasible, off-site compensation measures shall be undertaken in the form of using an agency-approved mitigation bank to purchase mitigation credits. Specific	Part 4.G.D	Skagit County and Ecology

	mitigation requirements as part of aquatic resources mitigation and mitigation banking policies and statutes (Title 90 of Chapter 90.74 and RCW 90.84) shall be determined and achieved through the Washington SEPA process and in consultation with permitting agencies.		
Flood	All development within the floodplain of Hansen Creek shall aim to conform to the standards within SCC Chapter 14.34, especially SCC 14.34.150 and 14.34.160 (3), and the IBC to mitigate any flood-related risks and minimize impacts to the floodplain.	Part 4.G.D	Skagit County
F.6. Wildlife			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Avoidance and minimization measures	During siting and design, the Applicant took several measures to avoid and minimize impacts to wildlife and habitat, including avoidance of Hansen Creek. Dudek contacted the local Washington Department of Fish and Wildlife (WDFW) staff via email to discuss the potential for special-status species identified during the literature review and database search to occur within the Project boundary. The email confirmed Dudek's assessment of species with a potential to occur within Project boundary and also provided survey recommendations and methods which will be utilized to determine presence/absence of these species. Implementation of the following Avoidance and Minimization Measure will help ensure that potential impacts to nesting birds are less than significant. *Vegetation removal and initial ground-disturbing activities should occur outside the nesting season, which generally occurs from February through August, to avoid potential impacts to nesting birds. This will ensure that no active nests are disturbed, and that vegetation removal can proceed rapidly. If vegetation removal and initial ground-disturbing activities occur during the nesting season, all suitable habitat shall be thoroughly surveyed by a qualified biologist for the presence of nesting birds before commencement of clearing. If any active nests are detected, a buffer of at least 50 feet (250 feet for raptors) should be*	Part 4.I.D	WDFW

	delineated, flagged, and avoided until the nesting cycle is complete, as determined by a qualified biologist.		
Best management practices (BMPs)	Noise BMPs will be implemented to reduce noise impacts to sensitive receptors adjacent to the proposed Project (see Section 4.P of this application).	Part 4.I.D; Attachment O	N/A
F.7. Environmental Health – Site Contamination			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
CSWGP, Construction Phase SWPPP, and ESCP	The Applicant will obtain a Construction Stormwater General Permit (CSWGP) from Ecology, which requires an ESCP and SWPPP. The ESCP and SWPPP (for construction and operation) will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. Applicable laws/codes include the following: • RCW 90.48, which establishes general stormwater permits for Ecology under the Water Pollution Control Act • WAC 173-200, 201A, and 463-76 Water Quality Standards for Surface Waters of the State of Washington • CWA (33 United States Code 1251)	Part 4.L.D	EFSEC, Ecology
Use of approved herbicides	Additionally, in compliance with RCW 17.10.140, the Applicant will only use herbicides that are approved for use in the state of Washington by the EPA.	Part 4.L.D	EPA, EFSEC, Ecology, and the Skagit County Noxious Weed Control Board
SPCC Plan	Consistent with requirements of 40 CFR Part 112, the Applicant will prepare an SPCC Plan to prevent spills during construction and operations and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures will address and prevent potential risks to water quality. The plan will be prepared pursuant to the requirements of: • CFR Part 112 • Sections 311 and 402 of the CWA • Section 402(a)(1) of the Federal Water Pollution Control Act	Part 4.L.D	EFSEC, Ecology

F.8. Environmental Health – Hazardous Materials			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Emergency Management Plan	Prior to Project construction and operations, the Applicant will develop an Emergency Management Plan to address worker health and safety, standards concerning potential release of hazardous materials, and fire prevention and control. This plan will provide safety guidelines and procedures for potential emergency-related incidents during the Project's construction, operation, and decommissioning phases. This includes coordination with emergency service providers and fire suppression measures associated with the Project. Specifically, the plan will be developed with input from, and in coordination with, the Skagit County Emergency Management, Skagit County Sheriff, Skagit County Fire Marshal, and DNR Wildland Fire Management Division. Applicable laws/codes include: • WAC 463-60-352 (2 through 4), which addresses fire and explosion, hazardous materials release, and safety standards compliance. • WAC 463-60-352(6), which describes emergency plans to ensure public safety and environmental protection. • 49 CFR §173.185m, which regulates the transportation of lithium-ion batteries. • 49 CFR §173.159, which regulates the transportation of lead-acid batteries. • International Fire Code	Part 4.M.D	Skagit County Emergency Management, Skagit County Sheriff, Sedro-Woolley Fire Department, Skagit County Fire Marshal
Fire Protection Plan	See Attachment N, Fire Protection Plan, and Part 4, Section 4.S for further discussion of fire risk. To minimize the risk of fire or explosions, the Project will implement BMPs. Typical BMPs will include, but are not limited to, the following: • Equip control building with fire extinguishers of pressurized water, dry chemical powder, or Carbon dioxide, as appropriate. • Use BESS equipment that is rated for containment and control of any internal fires without spreading to any adjacent equipment.	Part 4.M.D, Attachment N	N/A

	• Install fire water service mains and hydrants at start of the project to ensure ability to respond to a fire incident immediately during construction or normal operations at any point on the BESS site. • Secure the site with perimeter fencing with controlled access on to the site by authorized personnel only. • Minimize vegetation on the site. Limit combustible materials to stormwater management facilities only. • Establish roads before accessing the site to minimize vehicle contact with grass. • Use diesel construction vehicles instead of gasoline vehicles, where feasible, to prevent potential ignition by catalytic converters. • Prohibit vehicles from idling in grassy areas. • Restrict the use of high temperature equipment in grassy areas. • Monitor wildfire activity during Project construction and operations and, if necessary, modify Project activities, change the schedule, cease construction operations, or remove equipment. • Install lightning protection masts to protect generators and other equipment. • Install fire protection equipment in accordance with Washington state fire code. • Notify the local fire district of construction plans and access to Project equipment. • Provide mutual assistance in the case of fire in or around the Project during construction. • Prevent and control potential fires inside the Project Area with trained staff who have 24-hour access to the site.		
Building Permits	Project design and engineering will adhere to the applicable requirements of the National Electric Code, NFPA Standards, and Institute of Electrical and Electronics Engineers Standards. The Project will comply with the current codes at the time of construction, demonstrating compliance with WAC 463-62-020.	Part 4.M.D	Skagit County Building Division, Skagit County Fire District, and Washington State Building Code Council
BESS Design	The BESS will contain a fire suppression and detection system in accordance with fire code and NFPA Standards, specifically	Part 4.M.D	NFPA

	NFPA 855 "Standard for the Installation of Stationary Energy Storage Systems." The system will include monitoring equipment and alarm systems with remote shut-off capabilities.		
CSWGP, Construction Phase SWPPP, and ESCP	The Applicant will obtain a CSWGP from Ecology, which requires an ESCP, SWPPP. The ESCP and SWPPP (for construction and operation) will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. Applicable laws/codes include the following: • RCW 90.48, which establishes general stormwater permits for Ecology under the Water Pollution Control Act • WAC 173-200, 201A, and 463-76 Water Quality Standards for Surface Waters of the State of Washington • CWA (33 United States Code 1251)	Part 4.M.D	EFSEC, Ecology
Use of approved herbicides	Additionally, in compliance with RCW 17.10.140, the Applicant will only use herbicides that are approved for use in the state of Washington by the EPA.	Part 4.M.D	EPA, EFSEC, Ecology, and the Skagit County Noxious Weed Control Board
SPCC Plan	Consistent with requirements of 40 CFR Part 112, the Applicant will prepare an SPCC Plan to prevent spills during construction and operations and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures will address and prevent potential risks to water quality. The plan will be prepared pursuant to the requirements of: • CFR Part 112 • Sections 311 and 402 of the CWA • Section 402(a)(1) of the Federal Water Pollution Control Act	Part 4.M.D	EFSEC, Ecology
F.9. Land Use			
Measure	Description	Reference	Expert Agency Participation
None proposed	N/A	Part 4.N.D	N/A

F.10. Noise, Light, Glare and Aesthetic			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
Best management practices (BMPs)—Noise	WAC 173-60-050 exempts temporary construction noise from the state noise limits; however, BMPs will be implemented to reduce off-site construction noise impacts. Since construction equipment operates intermittently, and the types of machines in use at the Project change with the stage of construction, noise emitted during construction will be mobile and highly variable, making it challenging to control. Project construction will generally occur during the day, Monday through Friday. Furthermore, reasonable efforts will be made to minimize the impact of noise resulting from construction activities, including implementation of standard noise reduction measures listed below. Due to the infrequent nature of loud construction activities at the site, the limited hours of construction, anticipated compliance with FTA guidance thresholds for construction noise exposures, and the implementation of noise reduction measures, the temporary increase in noise due to construction is considered to be a less-than-significant impact. The construction management protocols will include the following noise reduction commitments to minimize noise impacts: • Maintain construction tools and equipment in good operating order according to manufacturers' specifications. • Limit use of major excavating and earthmoving machinery to daytime hours per WAC 173.60.050. • To the extent practicable, schedule construction activity during normal working hours on weekdays when higher sound levels are typically present and are found acceptable. Some limited activities, such as concrete pours for transformer pad foundations or the parking area if needed, will be required to occur continuously until completion. • Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks.	Part 4.P.1.D, Attachment O	EFSEC

	• For construction devices that use internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible. • Limit possible evening shift work to low-noise activities such as welding, wire pulling, and other similar activities, together with appropriate material-handling equipment. • Use a complaint resolution procedure to address any noise complaints received from residents.		
Lighting design	The Project will provide limited nighttime directional lighting for site access and security purposes. All lighting will be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties.	Part 4.P.2.N, Attachment P	N/A
F.11. Traffic and Transportation			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation
WSDOT Oversize and Overweight Permit	A permit will be obtained for heavy or oversized loads in accordance with WSDOT regulations including RCW 46.44 and WAC 468-38.	Part 4.R.D	WSDOT
Skagit County Right of Way Access Permit	Based on final Project design, the Applicant will obtain right-of-way access permits in accordance with County Standards for construction of an underground water line along Minkler Road as well as for construction of the three access driveways.	Part 4.R.D	Skagit County Public Works Department
Traffic Control Plan	A Traffic Control Plan will be prepared in consultation with Skagit County using the Skagit County Road Standards for traffic management during the construction of project access driveways and installation of an underground water line along Minkler Road.	Part 4.R.D	Skagit County Public Works Department
F.12. Public Services and Facilities			
Measure	Description	Reference (4.D section or attachment)	Expert Agency Participation
Fire Protection Plan	See Attachment N, Fire Protection Plan. To minimize the risk of fire or explosions, the Project will implement BMPs. Typical BMPs will include, but are not limited to, the following:	Part 4.S.D, Attachment N	N/A

	• Equip control building with fire extinguishers of pressurized water, dry chemical powder, or Carbon dioxide, as appropriate. • Use BESS equipment that is rated for containment and control of any internal fires without spreading to any adjacent equipment. • Install fire water service mains and hydrants at start of the project to ensure ability to respond to a fire incident immediately during construction or normal operations at any point on the BESS site. • Secure the site with perimeter fencing with controlled access on to the site by authorized personnel only. • Minimize vegetation on the site. Limit combustible materials to stormwater management facilities only. • Establish roads before accessing the site to minimize vehicle contact with grass. • Use diesel construction vehicles instead of gasoline vehicles, where feasible, to prevent potential ignition by catalytic converters. • Prohibit vehicles from idling in grassy areas. • Restrict the use of high temperature equipment in grassy areas. • Monitor wildfire activity during Project construction and operations and, if necessary, modify Project activities, change the schedule, cease construction operations, or remove equipment. • Install lightning protection masts to protect generators and other equipment. • Install fire protection equipment in accordance with Washington state fire code. • Notify the local fire district of construction plans and access to Project equipment. • Provide mutual assistance in the case of fire in or around the Project during construction. • Prevent and control potential fires inside the Project Area with trained staff who have 24-hour access to the site.		
Emergency Management Plan	Prior to Project construction and operations, the Applicant will develop an Emergency Management Plan to address worker health and safety, standards concerning potential release of	Part 4.S.D	Skagit County Emergency Management, Skagit County Sheriff, Sedro-Woolley

	hazardous materials, and fire prevention and control. This plan will provide safety guidelines and procedures for potential emergency-related incidents during the Project's construction, operation, and decommissioning phases. This includes coordination with emergency service providers and fire suppression measures associated with the Project. Specifically, the plan will be developed with input from, and in coordination with, the Skagit County Emergency Management, Skagit County Sheriff, and Skagit County Fire Marshal. Applicable laws/codes include: • WAC 463-60-352 (2 through 4), which addresses fire and explosion, hazardous materials release, and safety standards compliance. • WAC 463-60-352(6), which describes emergency plans to ensure public safety and environmental protection. • 49 CFR §173.185m, which regulates the transportation of lithium-ion batteries. • 49 CFR §173.159, which regulates the transportation of lead-acid batteries. • International Fire Code		Fire Department, and Skagit County Fire Marshal
Commissioning Plan	A commissioning plan will be developed to document procedures, including water supply, flow requirements, fire suppression, alarms, response guidelines, and training requirements.	Part 4.S.D	
Building Permits	Project design and engineering will adhere to the applicable requirements of the National Electric Code, NFPA Standards, and Institute of Electrical and Electronics Engineers Standards. The Project will comply with the current codes at the time of construction, demonstrating compliance with WAC 463-62-020.	Part 4.S.D	Skagit County Building Division, Skagit County Fire District, and Washington State Building Code Council
BESS Design	The BESS will contain a fire suppression and detection system in accordance with fire code and NFPA, specifically NFPA 855 "Standard for the Installation of Stationary Energy Storage Systems." The system will include monitoring equipment and alarm systems with remote shut-off capabilities.	Part 4.S.D	NFPA
F.13. Archaeological and Historical Resources, Cultural Resources			
Measure	Description	Reference (4.D. section or attachment)	Expert Agency Participation

Avoidance of Protected Sites	No protected archaeological resources will be significantly impacted or disturbed by the Project. All seven previously recorded archaeological resources within 1 mile of the Project are located outside the APDI. The nearest protected archaeological resources—unevaluated site 12655.18-01, unevaluated isolate 45SK314, and unevaluated site 45SK315—are located within 30 meters of planned access road AR2. The construction crews will be instructed not to drive or conduct any Project-related activities outside of the planned access road, Project site, and gen-tie line. Archaeological monitoring may be necessary to ensure Project-related activities stay within planned access roads, the Project site, and the gen-tie line during construction. Fencing is not recommended as it will draw unnecessary attention to the locations of the protected archaeological resources. Should the Project design change to include potential disturbances in protected archaeological resources, additional archaeological work may be necessary to determine the significance of the resources and/or mitigate potential significant adverse impacts. A DAHP archaeological excavation permit is required by Washington state law prior to archaeological investigations or Project-related ground-disturbing activities within protected archaeological resources.	Part 4.U.D, Attachment E (Confidential Cultural Resource Inventory)	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation
Archaeological Excavation Permit	Washington state law requires a DAHP archaeological excavation permit before archaeological investigations or Project-related ground-disturbing activities within protected archaeological resources. Protected archaeological resources include unevaluated or NRHP-eligible historic-period archaeological resources and all precontact resources. Since the Project seeks to avoid all archaeological resources, a DAHP archaeological excavation permit will not be required. If an inadvertent discovery of an archaeological resource is made during the construction, maintenance, or decommissioning of the Project and a DAHP archaeological excavation permit is required, then the required permit will be applied for and obtained following the discovery.	Part 4.U.D	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation
Inadvertent Discovery Plan (IDP)	An IDP will be prepared for the facility prior to commencing Project-related construction, maintenance, or decommissioning activities. The IDP will describe protocols to	Part 4.U.D	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal

	be followed at the time of a cultural resource or human remains discovery and include contact information for DAHP staff, the state's physical anthropologist, and all consulting parties, including tribes.		Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation
Continued Coordination with Tribes	Dudek initiated tribal consultation to assist the Applicant under the State Environmental Policy Act (SEPA) (see SEPA Checklist, Question 13c). Tribal consultation letters were submitted to appropriate tribes (listed in the "Expert Agency Participation" column) on February 9, 2024. Each tribe will receive copies of Dudek's cultural resources study, Cultural Resources Inventory Goldeneye Energy Storage Project, Skagit County, Washington, and have the opportunity to review and/or express concerns regarding the Project as currently designed. Tribal consultation remains ongoing with interested tribes during the permitting process to incorporate tribal input regarding the avoidance of potential impacts to cultural resources. This includes traditional use areas and other areas of significance to the tribes, and to facilitate any response to inadvertent discoveries during Project-related construction.	Part 4.U.D	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation

G. Project Plans and Submittal				
Submittal Name	Description	Submittal Timing	Expert Agency Participation	ASC Section References
Preliminary Site Plan	Shows the preliminary Project design in relation to the Project Lease Boundary and Project Area.	Included with ASC	N/A	Attachment A, Attachment B
Construction Stormwater General Permit (CSWGP) and Notice of Intent (NOI)	In compliance with Washington Administrative Code (WAC) 173-200 and WAC 463-76, the Applicant will obtain a CSWGP. The CSWGP requires an Erosion and Sediment Control Plan (ESCP) and a Stormwater Pollution Prevention Plan (SWPPP).	Prior to site preparation	Energy Facility Site Evaluation Council (EFSEC) with input from Ecology	Part 4, Section 4.E
Erosion and Sediment Control Plan (ESCP)	The ESCP will be prepared to control erosion and sediment discharges during construction and will include best management practices (BMPs) such as the appropriate use of silt fencing to avoid or eliminate runoff of contaminants.	Prior to site preparation	EFSEC with input from Ecology	Part 4, Section 4.A
Construction Phase Spill Prevention, Control, and Countermeasure (SPCC) Plan	The Construction Phase SPCC Plan will be prepared to prevent spills during construction and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures will address/prevent potential water quality issues. The plan will be prepared pursuant to the requirements of Code of Federal Regulations (CFR) Part 112, as well as Sections 311 and 402 of the Clean Water Act, and Section 402(a)(1) of the Federal Water Pollution Control Act.	Prior to site preparation	EFSEC with input from Ecology	Part 4, Section 4.L
Fire Protection Plan	The Fire Protection Plan will address fire prevention and control measures for construction and operation.	Included with ASC	With input from the Skagit County Fire Marshal and various fire protection districts	Part 3, Section 3.S; Attachment N
Traffic Control Plan	A Traffic Control Plan will be prepared in coordination with WSDOT and Skagit County for traffic management during construction and for construction of access approaches from WSDOT right-of-way. The plan will be developed consistent with WSDOT and Skagit County design standards.	Prior to site preparation	With input from WSDOT and Skagit County	Part 3, Section 3.R Part 4, Section 4.R
Construction Schedule	Final construction schedule.	Prior to site preparation	EFSEC	N/A
Construction Plans and Specifications	A set of construction plans, specifications, drawings, and design documents that demonstrate the Facility is in compliance with applicable conditions of the Site Certification Agreement.	Prior to site preparation	EFSEC	N/A

Operations Phase SWPPP	The Operations Phase SWPPP will be based on Ecology's SWPPP template and will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The SWPPP will include BMPs from Ecology's *Stormwater Management Manual for Eastern Washington*.	Prior to commercial operations	EFSEC with input from Ecology	Part 4, Section 4.E
Operations Phase SPCC Plan	The Operations Phase SPCC Plan will be prepared to prevent spills during operations and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures will address/prevent potential water quality issues. The plan will be prepared pursuant to the requirements of CFR Part 112, Sections 311 and 402 of the Clean Water Act, Section 402(a)(1) of the Federal Water Pollution Control Act, and Revised Code of Washington (RCW) 90.48.080.	Prior to commercial operations	EFSEC with input from Ecology	Part 4, Section 4.L
Landscaping Plan	Conceptual planting plan identifies number, size, and species of trees, shrubs, and groundcover to be planted following completion of construction.	Included with the ASC	Developed in accordance with Skagit County Code Chapter 14.16, Section 830	Part 3, Section 3.P; Attachment C
Unanticipated Discovery Plan	Plan to address situations when an unanticipated archaeological resource is discovered during construction.	At least 90 days prior to site preparation	EFSEC, DAHP, and Tribes	Part 3, Section 3.U Part 4, Section 4.U Attachment E, (Cultural Resource Survey Report)
Initial Site Restoration Plan	Consistent with WAC 463-72-040, the Applicant will provide EFSEC with an Initial Site Restoration Plan at least 90 days prior to beginning Project site preparation. The Initial Site Restoration Plan will generally follow the proposed retirement steps provided in the Applicant's Decommissioning Summary and Estimate (Attachment D).	At least 90 days prior to site preparation	EFSEC	Attachment D

H. Federal, State, and Local Requirements

H.1. Required Permits

Level (Federal, State, County, Local)	Agency	Permit	Application Section

State	Washington Department of Labor and Industries	Electrical Construction Permit WAC 296-46B, Washington Department of Labor and Industries Safety Standards—Installing Electrical Wires and Equipment— Administration Rules.	Part 2, Section H.1
State	Washington Department of Ecology	Water Quality Storm Water Discharge RCW 90.48, Water Pollution Control Act, establishes general stormwater permits for the Washington Department of Ecology National Pollutant Discharge Elimination System (NPDES) Permit Program. Construction Stormwater General Permit for NPDES (through EFSEC jurisdiction, WAC 463-76). WAC 173-201A, Washington Department of Ecology Water Quality Standards for Surface Waters of the State of Washington, which regulates water quality of surface waters. Federal statute(s) and regulations implemented by the above state statute(s) and regulations include Federal Clean Water Act, 33 United States Code (U.S.C.) 1251; 15 CFR 923-930.	Part 3, Sections 3.C and 3.E Part 4, Sections 4.C and 4.E
State	Washington Department of Ecology	Waters of the State (Water Quality) Section 401 Water Quality Certificate, Joint Aquatic Resource Permit Application	Part 3, Sections 3.C and 3.E Part 4, Sections 4.C and 4.E
State	Washington Department of Fish and Wildlife	Shorelines of the State WAC 173-18, Shoreline Management Act, Streams and Rivers Constituting Shorelines of the State. WAC 173-22, Adoption of Designations of Shorelands and Wetlands Associated with Shorelines of the State. JARPA and shoreline conditional use permit (CUP) for fill in wetlands associated with Shorelines of the State.	Part 2, Section B.6
H.2. Relevant Regulation or Requirement			
Level (Federal, State, County, Local)	Agency	Permit	Application Section
Federal	U.S. Army Corps of Engineers, Seattle Regulatory District	Waters of the United States Clean Water Act of 1972 (40 CFR 230) Section 404 Permit.	Part 4, Section 4.C; Attachment J, Attachment Q

Federal	U.S. Fish & Wildlife Service	Threatened or Endangered Species Endangered Species Act of 1973 (ESA; 16 U.S.C. Section 1531, et seq.) and implementing regulations. Sections 7, 9, and 10 Consultation under the ESA and Bald and Golden Eagle Protection Act (BGEPA).	Part 4, Section 4.I; Attachment J
Federal	U.S. Fish & Wildlife Service	Migratory Birds Migratory Bird Treaty Act (16 U.S.C., 703-711).	Part 4, Section 4.I; Attachment J
State	Washington Department of Ecology	Noise Control RCW 70A.20 Noise Control; WAC 173-58, Sound Level Measurement Procedures. WAC 173-60, Maximum Environmental Noise Levels; WAC 463-62-030, Noise Standards.	Part 4, Section 4.P.1; Attachment O
State	Washington Department of Ecology	Air Quality WAC-173-400, General Regulations for Air Pollution Sources. WAC 173-441, Reporting of Emissions of Greenhouse Gases. WAC 173-476, Ambient Air Quality Standards.	Part 4, Section 4.B
State	Washington Department of Ecology	Waters of the State (Water Quality) Section 401 Water Quality Certificate, Joint Aquatic Resource Permit Application (JARPA).	Part 4, Section 4.C; Attachment J, Attachment Q
State	Washington Department of Fish and Wildlife	Fish and Wildlife WAC 220-610 defines State species status and protections RCW 77.55, Hydraulic Code for in-water work; Hydraulic Project Approval (HPA)	Part 4, Sections 4.H and 4.J (for WAC 220-610) Part 4, Section 4.C (for RCW 77.55 and HPA)
State	Washington Department of Ecology	State Environmental Policy Act (SEPA) RCW 43.21C, Washington Environmental Policy Act. WAC 197-11, Washington Department of Ecology SEPA Rules, which establish uniform requirements for compliance with SEPA.	Parts 3 and 4
State	Washington State Department of Archaeology and Historic Preservation	Archaeology and Historic Preservation RCW 27.53, Archaeological Sites and Resources.	Part 4, Section 4.U

State	Energy Facility Site Evaluation Council	Energy Site Certification RCW 80.50 Energy Facilities – Site Locations.	This ASC addresses the site location review requirements for a Site Certification Agreement.
State	Washington State Department of Transportation	Transportation General Permit, WAC 468-51. Oversize and Overweight Permit, WAC 468-38-075.	Part 4, Section 4.R

Part 2 – Core Information

A. Project Details

A.1. Project Name

Goldeneye Energy Storage Project (Project)

A.2. Project Description

Provided is a possible outline for this section:

1. Definitions
2. Introduction
3. Project Components
   - 3.1 Battery Energy Storage System
   - 3.2 Project Substation
   - 3.3 Transmission Line and Inter-connection
   - 3.4 Site Access, Fencing, and Lighting
   - 3.5 Maintenance and Parking Areas
4. Construction
5. Operations and Maintenance
6. Decommissioning

1.0 Definitions

- Applicant: Goldeneye Energy Storage, LLC
- Project: The facilities to be permitted under this ASC, including the BESS, substation, supporting components, transmission line, associated driveways/entrances, stormwater management areas/features, parking areas, and onsite maintenance infrastructure area; however, it is not intended to include the upgraded segment of water line. While the Applicant will complete the necessary upgrades, it will be deeded to and owned by Skagit PUD once completed and is not intended to be governed by the site certification agreement.
- Project Boundary: The approximately 13-acre area that encompasses all or portions of 3 privately owned assessor parcels for which the Applicant has executed a purchase option agreement with the underlying property owner, a right-of-way agreement, or an easement. Construction and operation of the Project are limited to the Project Area described below and shown on Figures 1 and 2 in Attachment A.
- Project Area: The approximately 16-acre area that includes all of the Project facilities including the BESS, substation, supporting components, transmission line, associated driveways/entrances, stormwater management areas/features, parking areas, and an onsite maintenance infrastructure area.
- Fenced Area: The approximately 7-acre area within the Project Area that will be enclosed by fencing, including the BESS, substation, supporting components, parking areas, and an onsite maintenance infrastructure area.
- Gen-Tie Line Corridor: The approximately ¼ -mile long corridor within the Project Area, between the Project substation and the point of interconnection, that will encompass an underground 230-kv transmission line as well as 40-foot temporary and 30-foot permanent easement/right-of-way areas. The Applicant has executed an easement for the Fleurchamp property immediately to the south of the substation for transmission line installation. The portion of the transmission line on PSE land, as well as the access road, will be covered under the interconnection agreement with PSE as a right-of-way.
- Transmission Line Access Road: An approximately 650-foot road extending between the eastern edge of PSE's existing substation parking lot and the southwestern extent of the gen-tie line where it enters the PSE substation.

2.0 Introduction

The Applicant proposes to construct and operate the Project in unincorporated Skagit County, Washington (Figure 1 in Attachment A). The Project is a stand-alone 200 MW/800 MWh BESS, with related interconnection and ancillary support infrastructure. The Project is located just outside the eastern edge of Sedro-Woolley, off Minkler Road, within the Skagit Valley, less than 1 mile north of the Skagit River.

The Project is located in unincorporated Skagit County, within the Ag-NRL and RRv zones (County 2023). Current land uses in the Project Area include pasture fields, with a small section of scrub/shrub habitat present near the southeastern tip. A portion of the Project Area also contains four existing structures, which the underlying landowner has agreed to demolish as part of Project construction. Land uses surrounding the project area include rural single-family residences, pastureland, and infrastructure. The Project area is bordered on the north by Minkler Road, and is crossed in a roughly north-south direction by Hansen Creek, and electrical transmission lines that connect to the Sedro-Woolley Substation.

The Applicant is considering various specific lithium-ion battery technologies (see Attachment F for sample equipment specifications). Final technology selection will dictate details of the design layout within the Project Area. The preliminary layout accounts for the Project's generating capacity; however, the precise equipment and layout have not yet been finalized and the Applicant seeks to permit a range of technology options to preserve design flexibility. Therefore, this ASC analyzes the largest anticipated, worst-case Project Area development footprint.

The proposed facility will provide a service to the regional electric grid by receiving energy (charging) from the PSE electric transmission system, storing energy on site, and then later delivering energy (discharging) back to the point of interconnection. Following construction, the proposed use will not create emissions to air, will not require sanitary facilities, and will not require water except to maintain water-efficient and low-impact landscaping design along the project frontage, and to provide a water source for fire protection.

The Project Area was selected by the Applicant for its favorable site suitability characteristics, including proximity to electrical infrastructure, level terrain and opportunities for efficient construction. The Project will have a number of benefits to the local community and Washington state. Construction of the Project will support up to 50 jobs during peak construction and 2 permanent jobs during operations. The Project will also provide Skagit County with additional tax revenue. In addition, construction of this renewable energy resource will help Washington meet its goal of 100 percent clean electricity supply as set forth in the Clean Energy Transformation Act, passed by the Washington legislature in 2019.

3.0 Project Components

This section identifies the components, structures, and systems incorporated in the Project's design. The Project components described below are shown on the Preliminary Site Plan (Figure 2 in Appendix A). The Preliminary Site Plan is based on studies and facility design done to date and is subject to change following outstanding technical studies and design and stakeholder consultations. The site plan is based on the following:

- Site geotechnical report, showing infeasibility to infiltrate stormwater, potentially perched groundwater with elevations measured between approx. 51'-55', and unsuitable native soils for backfill.
- Floodplain study, showing the 100-year flood elevation is about 61.3 feet. The proposed equipment will be elevation 1 foot above the base flood elevation (BFE). The imported fill required to meet the 1 foot above BFE requirement (a reduction of approximately 20,000 cubic yards of flood storage at the BFE elevation within the disturbance limits of the BESS site), will not increase the water surface elevation of the BFE by more than 1 foot at any point (SCC14.34.200).
- Stormwater management will be per Skagit County requirements and the Washington State Department of Ecology, Stormwater Management Manual for Western Washington (SMMWW). A stormwater report following the Skagit County requirements will be provided prior to construction. The current stormwater detention pond shown in the site plan was preliminarily sized using the Western Washington Hydrology Model, to verify compliance with the SMMWW. Storm drain

infrastructure was preliminarily modeled using the Type 1A Storm distribution of the 100-year, 24-hour design storm (4.1 inches per NOAA Atlas 2). Further modeling and reporting will be prepared at a later date to meet the requirements set forth by Skagit County, including a construction SWPPP, source control of potential pollutants, preservation of natural drainage patterns and outfalls, onsite stormwater management, runoff treatment, flow control, wetlands protection and operations and maintenance. The project lies outside the NPDES permit area.

A set of Construction Plans and Specifications will be provided to the State of Washington EFSEC for approval at least 60 days prior to the beginning of construction.

3.1 Battery Energy Storage System

Lithium-ion batteries are the most common type of utility-scale BESS technologies. Lithium-ion batteries are a type of rechargeable battery where lithium ions, suspended in an electrolyte, move from negative to positive electrodes and back when recharging. A variety of chemistries fall under the "lithium-ion" term, each with varying performance, cost, and safety characteristics. Lithium-ion batteries have a typical lifespan of thousands of cycles and 20+ years and will experience degradation of capacity and efficiency over that time. The lithium-ion battery technology under consideration for this project is Lithium Iron Phosphate and will be designed for the 20-year life of the project but will require periodic augmentation to make up for the capacity lost to degradation.

Lithium-ion battery systems are modular energy storage systems. Each module contains multiple smaller battery cells, each measuring approximately 3 by 7 by 8 centimeters. The module containing the cells is relatively small, generally about the size of a desktop computer processor. Modules are placed in anchored racks within the enclosures. Each enclosure will have its own heating and cooling system to maintain the temperature within the enclosure within operational parameters.

As mentioned above, the Applicant is considering multiple battery technology purpose-built enclosures manufacturers, and thus seeks to permit a range of options to preserve design flexibility. The description provided here represents a typical battery energy storage operation, but details of components may vary depending on the technology selected during final design. The Project layout includes up to approximately 308 BESS units. Each BESS enclosure will be contained in an enclosure measuring up to approximately 26 feet (ft) in length, 6 ft in width, and 10 ft in height. The enclosures will have a battery management system for automated monitoring and managing of the batteries to ensure design performance, as well as providing control for the charging/discharging of the batteries along with temperature monitoring and control of the individual battery cell temperature with an integrated cooling system.

Batteries operate with direct current (DC) electricity that must be converted to alternating current (AC) using inverters for compatibility with the existing electric grid. This conversion is completed by an inverter. Depending on the final battery technology and battery container/enclosure design, the inverters may be included within the container/enclosure or outside on skids adjacent to containers/enclosures. In addition, up to approximately 77 medium voltage (MV) transformers will be installed. Each MV transformer will be approximately 10 feet in length, 10 feet in width, and 8 feet in height. From the transformers, buried medium-voltage (34.5 kV) electrical cables will transfer power to and from a substation located in the southern portion of the Project Area.

The BESS project will be constructed and tested in compliance with applicable National Fire Protection Codes, including National Fire Protection Association (NFPA) 855, the Standard for the Installation of Stationary Energy Storage Systems. BESS enclosures will be tested to UL 9540A.

3.2 Project Substation

The Project substation will increase the voltage to match the 230-kV of the transmission line and PSE's Sedro-Woolley Substation. The Project substation and associated interconnection infrastructure will include equipment such as MV switchgear, main power transformer, high voltage (HV) breaker, underground conversion structure, control enclosure, free-standing steel switch-rack structures, breakers, power meters, lightning protection masts, and associated electrical lines. Backup power for the Project

substation will be provided by an Uninterruptible Power Supply (UPS) system with its own battery backup housed in the control enclosure building. The Project substation will be constructed on an approximately 0.5-acre area and will include concrete foundations. The Project substation will be separately fenced for electrical safety. The substation equipment will generally range in height from 20 feet to 35 feet above ground level with the tallest component being the lightning mast (35 feet).

3.3 Gen-Tie Transmission Line and Inter-connection

An approximately 800-foot long underground 230-kV transmission line will extend from the Project substation to the point of interconnection (POI) with the existing PSE Sedro-Woolley Substation. A preliminary transmission line alignment is shown on Figure 2 in Attachment A. The route alignment will be finalized prior to construction. The line will be installed approximately 3 feet below ground using open-cut trenching in some locations and trenchless in others. The transmission line will be installed underneath Hansen Creek and the 100-year floodplain in which the Project is sited via trenchless installation methods. This type of construction has minimal ground disturbance along the length of the installation which will reduce impacts to sensitive resources. Construction and installation of the transmission line will require temporary impacts resulting from staging and installation, but once installed, will not result in permanent impacts as the line will be entirely underground. A temporary 40ft wide area, outside the fenceline and in line with the proposed centerline, will be used during construction and installation of the underground line. There will also be an underground vault installed just outside PSE's substation to allow for any underground cable splicing that is needed. This temporary work area is anticipated to be 100 feet by 75 feet with the vault dimensions of approximately 28 feet by 10 feet.

The transmission line will be constructed in compliance with codes and standards from the following: National Electrical Safety Code, Washington Administrative Code (WAC), American National Standards Institute, National Electrical Manufacturers Association, American Society for Testing and Materials, American Association of State Highway and Transportation Officials (AASHTO), Occupational Safety and Health Administration (OSHA), as well as other applicable laws and construction codes.

3.4 Site Access, Fencing, and Lighting

The Project will be accessed from Minkler Road, via three new driveway entrances. Each driveway will be at least 26 feet wide, excluding the apron, and will be secured with 8-foot-tall gates. Fencing will connect to these gates and be installed around the perimeter of the Project for general security purposes and public safety. The fence is expected to be a 12- to 16-foot-tall precast solid panel fence. Internal 20-foot-wide access roads will provide access around the site, within the fenced area, running north south between the groupings of BESS units.

The site fencing will be screened with plantings of trees and shrubs, in compliance with Skagit County Code Chapter 14.16, Section 830, and as shown in the Conceptual Planting Plan (Attachment C).

Lighting is needed in the project substation for security and occasional after-hours work; however, the Applicant would limit the amount of lighting and would shield lighting as needed. In addition, applicable lighting would include motion-detector-activated lighting to minimize the amount of time lights need to be active. Lighting is also needed at the collector substation in accordance with NERC standards.

A new access road will be constructed to connect PSE's existing substation entrance and parking lot to the southwestern end of the gen-tie line for use during construction and for routine maintenance. The access road will be paved or gravel and will be approximately 16 feet wide and 800 feet long.

3.4 Maintenance and Parking Areas

Maintenance and parking areas will be located within the fenced areas. The Preliminary Site Plan (Attachment B) shows two parking stalls within the fence line of the eastern portion of the project area, and an onsite maintenance infrastructure area within the fence line of the western portion of the project area. These locations are subject to change pending final design, but any maintenance and parking areas associated with the Project will remain within the fence line.

4.0 Construction

The Project's construction is anticipated to begin in the third quarter of 2025, with a commercial operations date planned for October 2026. Construction is estimated to take approximately 14 months and will occur Monday through Friday, between 7:00 a.m. and 6:00 p.m. The construction of the Project will include transport and delivery of Project equipment and materials, site preparation, equipment installation, and revegetation and landscaping. Each of these activities is generally described below.

4.1 Construction Staff

During construction, the on-site construction workforce will range from a low of approximately 20 people at the start of construction to a maximum of up to 80 individuals; however, the average daily workforce on site during construction is expected to be approximately 50 individuals, comprising construction, supervisory, support, and construction management personnel. It is anticipated that the construction workforce will commute to the site each day from local communities and report to the designated construction maintenance areas prior to the beginning of each workday. The Applicant will solicit experienced Washington-based contractors with the goal of hiring construction workers from local communities. All employees hired directly by the Applicant may go through U.S.-wide background checks, including criminal record check, credit rating check, and employment/professional references, as applicable.

4.2 Transport and Delivery

Heavy vehicles delivering equipment and materials are expected to travel from ports near Seattle or driven to the Project Area from manufacturing facilities or warehouses in the United States or Canada. Deliveries will access the Project via I-5 and SR 20. The Project site is located directly south of Minkler Road, which will provide primary access. Worker commutes are anticipated to also access the site via I-5, SR 20, and Minkler Road. It is anticipated that during peak construction, workers will account for a maximum of 75 vehicles/day (roundtrips) and deliveries of equipment and materials will generate a maximum of five daily roundtrips, for a total of up to 81 roundtrips added to the road network during the 14-month construction period. Peak traffic numbers will occur over a 3-month period, with the numbers tapering up and down before and after the peak. The improvements associated with the three new site access points/driveways will accommodate the equipment transport. Refer to Part 4.R for further details on transportation and delivery, including detailed traffic estimates over the course of the construction period. Existing utility access roads near the PSE Sedro-Woolley Substation would provide access to the transmission line and the Sedro-Woolley Substation, which is accessible from Minkler Road and Hoehn Road. No new roads, other than internal access roads within the Fenced Area, will be required to provide access to the project site.

4.3 Water Use During Construction

During Project construction, water will be required for common construction-related purposes, including—but not limited to—dust suppression, soil compaction, and grading. Dust-control water may be used for ingress and egress of on-site construction vehicle equipment traffic and for the construction of the energy storage equipment. Up to approximately 726,000 gallons of water could be used during Project construction, including for dust control, equipment and excavated material washing, concrete, and miscellaneous uses. Water will be obtained from Skagit Public Utility District (PUD) through an existing 4-8-inch waterline in Minkler Road that will be upgraded to be 8 inches throughout to supply sufficient water volume for fire suppression (see Drawing C3-1 in Attachment B). Construction water demand is not expected to vary significantly based on annual precipitation levels. Currently there is one existing waterline service to the residences on the western part of the property.

4.4 Site Preparation

Initial site preparation will involve grubbing and vegetation clearing within the Project Area, along with the removal of onsite wetlands, the addition of a stormwater management area, and installation of BMPs as described in Section 4.E (detailed stormwater analysis). Clearing and grubbing will be phased, as needed, and soil will be temporarily stabilized. The stormwater infrastructure will be installed that will drain to the detention pond contained within the center area of the site. Portable toilets will be placed on site and serviced by licensed providers.

Existing structures on the eastern portion of the Project Area will be removed during the site preparation phase. Structures to be removed include buildings and foundations, septic system infrastructure, water service meter and water lines, existing utility lines, asphalt driveway and fencing. All the items will either be completely removed or properly abandoned.

4.5 Installation of Project Equipment

Following site preparation activities, the general sequence for construction will involve installation of the following equipment: BESS units, inverters (if not within BESS units), MV transformers, underground collection cabling, collection substation, gen-tie access road, 230-kV transmission line, and associated equipment.

In general, grading for the Project will occur in the Fenced Area, as this is where the above ground equipment will be installed. Project infrastructure will be elevated above the flood depth in accordance with the Site Grading Plan (Drawings C2-1 and C2-2 in Attachment B). In areas where BESS units, inverters/transformers, and the substation will be sited, an average of approximately 3 feet of fill will be placed to bring the equipment above flood levels. A stormwater basin will be excavated within the existing transmission line rights of way, between the eastern and western BESS areas, to provide compensatory flood storage to offset the fill placement. Minimal grading may also be required for installation of the gen-tie access road. During grading, the Applicant intends to export soils excavated from one area and import fill for other areas. A total of approximately 70,000 cubic yards of fill material is anticipated to be imported for project construction, while an estimated 40,000 cubic yards of material is anticipated to be exported offsite.

Trenching will be required for placement of underground stormwater, electrical and communication lines within the Fenced Area. Once grading and trenching have occurred, equipment foundations, equipment enclosures, and equipment vaults will be installed. The Project substation and battery yard will have a grounding grid installed and will be covered with aggregate surfacing for safe operation.

As previously stated, the gen-tie line will be installed a minimum of 3 ft below ground using open-cut trench in some locations and trenchless methods to route under Hansen Creek in others. During this process, there could be multiple crews working on the site with various equipment and vehicles, including special vehicles for transporting the batteries and other equipment. As the BESS units (preassembled) are offloaded onto foundations, the electrical collection and communication systems will also be installed. The wiring will connect to the appropriate electrical and communication terminations and the circuits will be checked and commissioned prior to operation.

Portions of the existing Skagit Public Utilities District water line in Minkler Road will require an upgrade from its current 4 to 6 inch diameter asbestos concrete and PVC pipes to 8-inch-diameter ductile iron, to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. This line is owned and maintained by Skagit PUD. In accordance with the PUD's policy, the Applicant will implement upgrades and then deed the line to the PUD. Permitting for water line upgrades is handled through Skagit County. The Applicant discloses this information here for informational purposes only. Upgrades and maintenance to the water line are not requested under this ASC.

4.5 Revegetation and Post-Construction Site Control

Following construction, areas that have been temporarily disturbed will be revegetated for soil stabilization and erosion control purposes. It is anticipated that revegetation will involve application of hydroseeding, with a suitable mix of non-invasive grass species and/or species currently found throughout the site. In addition to revegetation of temporarily disturbed areas, permanent BMPs will be implemented to address long-term stormwater requirements. See Attachment X for the project Landscaping Plan.

5.0 Operations and Maintenance

This section details the general operations and maintenance (O&M) procedures and protocols that will be implemented to ensure safe and proper functionality of the Project over its lifetime. Also detailed in this section are fire protection measures to be implemented.

5.1 General O&M Procedures and Protocols

Periodic maintenance and inspection of the infrastructure will occur intermittently over the course of Project operations. Typical maintenance will follow basic monthly inspections, preventative quarterly inspections, and an in-depth annual maintenance program. Up to two full-time, locally based personnel will be on staff during project operations. On average, two vehicle trips to the site per month are anticipated during operations. Approved technicians will service the BESS units and associated equipment once per month. A performance audit and inspection to assess the quality of equipment will be conducted annually. If any equipment needs to be replaced before the Project's end-of-life, the Applicant will reuse, recycle, or dispose of equipment in accordance with applicable regulations and best management practices. Ethylene glycol, refrigerant, and lubricating oils will be kept in the O&M storage containers on site; note that all BESS equipment will come pre shipped with 136 gal on Ethylene glycol based coolant. Small amounts may be kept on hand in storage for maintenance purposes. No operational water is anticipated to be required.

Vegetation within the Project fence line will be managed throughout the life of the Project. Mechanical vegetation control such as mowing, trimming, and pruning will be the primary means for vegetation management. Mowing frequency is anticipated to be once per month during the growing season. Herbicides may be utilized for vegetation control; however, an effort will be made to minimize use and only apply bio-degradable, U.S. Environmental Protection Agency (EPA) registered, organic solutions that are non-toxic to wildlife and used in a manner that fully complies with all applicable laws and regulations. BMP Maintenance will follow the requirements set forth in the SWMMWW Appendix V-A BMP Maintenance Tables.

5.2 Fire Protection Measures

Once gates are installed on the Project site, a KnoxBox or similar lock box will be installed on the front gate to allow for Fire Department access to the site. The facilities will be outfitted with fire-suppression equipment to meet or exceed applicable fire safety codes and standards. Fire hydrants will be installed within the Fenced Area site and will connect to the water line in Minkler Road. Water from this line is supplied by the Skagit PUD.

Fire-protection measures will include prevention, suppression, and isolation methods and materials. All methods will meet NFPA 68 or 69, and NFPA 855. This may include smoke/fire detection sensors; ground fault detectors and alarms; systems for automatic shutdown of all cooling fans and opening of electrical contacts in the battery system; and systems for automatic release of a fire-suppression agent appropriate to the battery technology. These methods will depend on the battery technology selected. In addition to fire-suppression improvements, the Applicant may use batteries that are UL Certified and include built-in fail safes designed specifically to prevent thermal runaway and fire spread both withing the enclosure, and preventing spread outside of the enclosure.

The Project will comply with all applicable provisions of the current adopted International Fire Code (IFC) with Washington State Amendments and the current adopted Skagit County Ordinances. The stationary storage battery systems will comply with IFC 1206. During the design phase of each project, the Applicant will ensure appropriate controls are put in place/built into the design of the unit to mitigate fire hazards and propagation. The Applicant will design the project to ensure compliance with IFC and Skagit County Ordinances. Specifically, the following topics will be addressed:

1. Fire protection methods;
2. Fire detection methods;
3. Container spacing;
4. Thermal propagation mitigation methods;
5. Firefighting recommendations; and
6. Hazard Mitigation Analysis.

6.0 Decommissioning

The Project is expected to have an operational life of approximately 20 years, following which the Project may be re-powered with new equipment (under subsequent permits/certification as appropriate and required) or retired and restored adequately to a useful, non-hazardous condition. The Project will be decommissioned following the end of its useful life. A preliminary decommissioning cost estimate is provided as Attachment D to this ASC. Pursuant to WAC 463-72-040, the Applicant will provide EFSEC with an Initial Site Restoration Plan at least 90 days prior to beginning Project site preparation.

Decommissioning will be conducted in accordance with EFSEC's rules and the Site Certification Agreement for this Project and will involve removal of all equipment associated with the Project and returning the area to substantially the same condition as existed prior to Project development. Decommissioning will include consideration of local environmental factors to minimize effects such as erosion during the removal process, and the recycling of materials demolished or removed from the site to the extent feasible. The activities that may occur as part of decommissioning are summarized below:

- Decommissioning will commence once the Project has been fully de-energized and isolated from all external electrical connections.
- Consistent with the measures described for construction and operation of the Project, BMPs will be implemented and maintained throughout the decommissioning phase as needed to avoid and minimize potential impacts to the surrounding environment, particularly those related to dust, erosion, and stormwater.
- Once the site has been adequately prepared for decommissioning, the following equipment will be removed: BESS units and step-up transformers, electrical wiring and connections, Project substation components, communication equipment, and fencing. All above-grade foundations will be removed to a level of no less than 3 ft below the ground surface unless requested to be maintained by the property owner.
- Equipment and materials will be salvaged or recycled to the extent feasible and in coordination with licensed subcontractors, local waste haulers, and/or other facilities that recycle construction/demolition waste; the remaining materials will be disposed of by the contractor at authorized sites, in accordance with applicable laws. Reuse or recycling of materials will be prioritized over disposal. Batteries will most likely be shipped to recycling facilities. All waste requiring special disposal (e.g., transformers) will be handled according to regulations that are in effect at the time of disposal.
- Following removal of Project equipment, site restoration will be conducted such that the physical conditions of the area are returned to substantially the same condition that existed prior to Project development. These activities will include removal of gravel and other aggregate material, localized grading and disking to match surrounding elevations, replacement of topsoil from on-site stockpiles, and revegetation of disturbed areas with an appropriate hydroseed mix.
- During decommissioning, the Applicant will adhere to federal, state, and local requirements, including obtaining and adhering to applicable permits and authorizations.

A.3. Project Schedule, Employees, and Public Access				
Phase	Proposed Timing	Duration	Employee numbers on site & frequency	Public Access (yes/no)
Site preparation	Q3 2025	1 month	20	No
Construction	Q3 2025 – Q4 2026	14 months	80 max, 50 average	No
Operation/use	Q4 2026 – Q4 2046	20 years	Up to two (locally employed, monthly site visits)	No
Decommissioning/restoration	Q1 2047	12 months	80 max, 50 average	No

A.4. Phased and Future Projects		
Is this project an addition, continuation, or expansion of a previous proposal or are there other related actions planned? If Yes, describe past or future projects that relate to this proposal, including expected timing. (Include additional sheets as needed).	☒ No	☐ Yes

A.5. Site Maps and Plans				
Map #	Map Name	Purpose and Description	Completed?	Included?
Attachment A Figures				
1	Site Location	Shows Project location	Yes	Yes
2	Site Plan	Displays preliminary layout of all Project components including gen-tie, access roads, and water line upgrade	Yes	Yes
3	Residence Map	Displays residences within 500 feet of Project components	Yes	Yes
Attachment B Civil Engineering Drawings				
C1-1	Preliminary Site Plan	Display preliminary layout of Project components on main Project parcels	Yes	Yes
C1-2	Preliminary Removals & Stream Restoration Plan	Depicts existing infrastructure to be removed or abandoned prior to construction	Yes	Yes
C2-1	Preliminary Grading Plan	Identifies existing and proposed topographic contours and quantities of soil and fill to be removed or imported	Yes	Yes
C2-2	Preliminary Cut/Fill Map	Provides map identifying the difference between existing and proposed elevations	Yes	Yes
C2-3	Existing Drainage Plan	Depicts existing contours and drainage flow paths	Yes	Yes
C2-4	Proposed Drainage Plan	Depicts proposed contours and drainage flow paths	Yes	Yes
C3-1	Preliminary Fire Protection Plan	Presents proposed water line improvements and water/hydrant service to proposed facility	Yes	Yes
C3-2	Preliminary Fire Protection Plan Details	Provides typical trench, blocking, and hydrant system engineering detail	Yes	Yes

A.6. Other Projects on the Same Site		
Are you aware of any applications pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If Yes, please describe. (Include additional sheets as needed).	☒ No	☐ Yes

B. Project and Site Information

B.1. Earth and Ground Disturbance

B.1.a. Soils and Slopes Describe and identify if within disturbance area or within proximity to disturbance area (within 300 feet).

Soil types	Surface topsoil, Quiet-Water Deposits (Silts with Sand, Sandy Silts and Silty Sands), Overbank Deposits (Silty Sand with Gravel), Channel Deposits (Silty Gravels with Sand OR Silty Sand with Gravel).
Steepest slope	50%
Range of Slopes	0%-50%
Sensitive Area (talus slopes…)	None identified (see Part 4.A and Attachments G and J).

B.1.b. Demolition, Grade, and Fill

Would any demolition or renovation occur during construction? If yes, list the method and waste use or disposal site.	☐ No	☒ Yes
Existing buildings on the western portion of the Project Area would be demolished by construction equipment and demolished materials would be recycled or disposed at a local construction debris landfill. The existing asphalt driveway could be milled and reused for the proposed roadway base material. All other materials not able to be recycled will be hauled to the local construction debris landfill.		
Would any demolition or renovation occur during operation? If yes, list the method and waste use or disposal site.	☒ No	☐ Yes
Would any grade, fill, or excavation in upland areas occur during construction? If yes, indicate whether grading, filling, or excavating will occur. Then indicate the cubic yards proposed, the source of fill, and/or the disposal site or use.	☐ No	☒ Yes
Grading, excavating, and filling will occur. Approximately 67,000 cubic yards of fill material will be sourced from a local permitted supplier. Approximately 35,500 cubic yards of topsoil and subsoil will be excavated and hauled offsite. Soil will be tested prior to removal offsite to confirm no hazardous materials are present, and will be disposed of as construction debris or soil fill at an approved facility.		
Would any grade, fill, or excavation in upland areas occur during operation? If yes, indicate whether grading, filling, or excavating will occur. Then indicate the cubic yards proposed, the source of fill, and/or the disposal site or use.	☒ No	☐ Yes
Is fill or excavation proposed within surface waters, wetlands, or frequently flooded areas? If yes, indicate whether grading, filling, or excavating will occur. Then indicate the cubic yards proposed, the source of fill, and/or the disposal site or use.	☐ No	☒ Yes
Grading, filling and excavating will occur in the wetlands and 100-year flood plain. Refer to sheet C2-2 for a map of the preliminary proposed cut/fill depths found on site. Fill and borrow source locations to be determined by the construction contractor. Unsuitable soil material will be removed from the site and the disposal sites are to be determined by the construction contractor.		

B.1.c. Structure Height

Identify the tallest height of any proposed structure, not including antennas:	**35 feet (lightning mast)**
Describe the principal exterior building material proposed for all structures:	**Painted steel**

B.2. Landcover Types and Acreage Add additional Project Site Areas as appropriate for the site.					
Landcover Types		Acreage within Project Boundary			
		Existing Conditions Pre-Project	Proposed Temporary Impacts	Proposed Altered Habitat	Proposed Permanent Impacts
Roads, structures, and other impervious surfaces or developed lands		3.9	1.5	–	1.1
Wetlands	Emergent (Marshes, Meadows, etc.)	1.2	–	–	1.2
	Scrub and Shrub	0.3	–	–	–
	Forested	–	–	–	–
	Open Water	–	–	–	–
Vegetated Uplands	Agriculture and Croplands	–	–	–	–
	Modified Grasslands and Improved Pasture	–	–	–	–
	Grasslands and Unimproved Pasture	14.8	–	–	9.9
	Shrub-steppe and Scrublands	1.9	–	–	1.9
	Forested and Woodlands	1.5	–	–	0.2
	Mixed Environments		–	–	
Unvegetated (rock, earth, talus slopes, etc.)			–	–	–
Other (ephemeral streams, intermittent streams, etc.)		0.3	–	–	–
TOTAL:		**23.7**	**2.6**	–	**14.3**

B.3. Plants and Habitats		
Are there any plants or habitats present on the site? If yes, complete the following portions. If none, proceed to section B.4.	☐ None	☒ Yes
Are there deciduous trees (i.e. alder, maple, aspen) present on the site? If yes, specify below.	☐ No	☒ Yes
willow species (*Salix* spp.), red alder (*Alnus rubra*), bigleaf maple (*Acer macrophyllum)*		
Are there evergreen trees (i.e. fir, cedar, pine) present on the site? If yes, specify below.	☐ No	☒ Yes
Douglas-fir (*Pseudotsuga menziesii*), western red cedar (*Thuja plicata*)		
Are there shrubs, grass, or pasture present on the site? If yes, specify below.	☐ No	☒ Yes
osoberry (*Oemleria cerasiformis*), salmonberry (*Rubus spectabilis*), trailing blackberry (*Rubus ursinus*), Colonial bentgrass (*Agrostis capillaris*)		
Are there shrub-steppe plants (i.e. sage brush, native grasses) present on the site? If yes, specify below.	☒ No	☐ Yes
Are there wet soil plants (i.e. cattail, buttercup, bulrush, skunk cabbage) present on the site? If yes, specify below.	☐ No	☒ Yes
Creeping buttercup (*Ranunculus repens*), Bitter dock (*Rumex obtusifolius*), Fowl bluegrass (*Poa palustris*)		
Are there water plants (i.e. water lily, eelgrass, milfoil) present on the site? If yes, specify below.	☒ No	☐ Yes
Are there other vegetation types present on the site? If yes, specify below.	☒ No	☐ Yes
Are there noxious or invasive plant species present on the site? If yes, specify below.	☐ No	☒ Yes
reed canary grass (*Phalaris arundinacea*), Himalayan blackberry		
Are there other habitat types present on the site? If yes, specify below.	☐ No	☒ Yes
Hansen Creek		
Do you know of any at-risk plant species present on the site? These may include: • Threatened or endangered • Species of local importance • Federal or state listed • Special Status • Federal or state priority For tribal-specific fish, plant, or wildlife resources present on the site where abundance is limited elsewhere, see section B.11.		
If none are known to be on the site, check no. If yes, specify below.	☒ No	☐ Yes

Species Name	Listing Status	Source for Identification

B.4. Forest Harvest		
Is a forest practice or timber harvest proposed on any sites associated with the proposal? If yes, please provide the acres proposed and other pertinent details below.	☒ No	☐ Yes
B.5. Fish and Wildlife		
Are there any animals that have been observed or are known to be on or near the site? If yes, complete the following portions. If none, proceed to section B.4.	☐ None	☐ Yes
Have birds (i.e. hawk, heron, eagle, songbirds) been observed or known to be on or near the site, or to use the site as a travel corridor? If yes, please specify and provide details below.	☒ No	☐ Yes
Have mammals (i.e. deer, bear, elk, beaver) been observed or known to be on or near the site, or to use the site as a travel corridor? If yes, please specify and provide details below.	☒ No	☐ Yes
Have fish (i.e. bass, salmon, trout, herring, shellfish) been observed or known to be on or near the site, or to use the site as a travel corridor? If yes, please specify and provide details below.	☐ No	☒ Yes
Hansen Creek has known occurrences of various fish species.		
Have noxious or invasive animal species been observed or known to be on or near the site, or to use the site as a travel corridor? If yes, please specify and provide details below.	☐ No	☒ Yes
Have other animals been observed or known to be on or near the site, or to use the site as a travel corridor? If yes, please specify and provide details below.	☒ No	☐ Yes
Do you know of any at-risk animal species present on the site? These may include: • Threatened or endangered • Species of local importance • Federal or state listed • Special Status • Federal or state priority For tribal-specific fish, plant, or wildlife resources present on the site where abundance is limited elsewhere, see section B.11.		
If none are known to be on the site, check no. If yes, specify below.	☐ No	☒ Yes

Species Name	Listing Status	Source for Identification
Chinook salmon (*Oncorhynchus tshawytscha*)	Federally threatened, Priority species	U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database, WDFW occurrence databases, site visit to verify potential habitat
steelhead (*Oncorhynchus mykiss*)	Federally threatened, state candidate, Priority species	USFWS IPaC database, WDFW occurrence databases, site visit to verify potential habitat
bull trout (*Salvelinus confluentus)*	Federally threatened, state candidate, Priority species	USFWS IPaC database, WDFW occurrence databases, site visit to verify potential habitat

Dolly Varden (*Salvelinus malma*)	Federally threatened, state candidate, Priority species	USFWS IPaC database, WDFW occurrence databases, site visit to verify potential habitat

B.6. Property/Site Designations Provide information for the following fields.

Comprehensive Plan (name, date, pertinent sections):	Skagit County Comprehensive Plan, adopted June 30, 2016
	Pertinent sections include:
	• Chapter 3: Rural
	  ○ Goal 3A-3, policy 3A-3.3
	• Chapter 4: Natural Resource Lands
	  ○ Goal 4A-3, policies 4A-3.1, 4A-3.2, and 4A-3.3
	• Chapter 5: Environment
	  ○ Goal 5A-5, policy 5A-5.3 and 5A-5.7
	• Chapter 9: Utilities
	  ○ Goal 9A-3, policies 9A-3.1 and 9A-3.2
	  ○ Goal 94-A, policy 9A-4.1
	  ○ Goal 9A-5, policy 9A-5.2

Current Zoning:	Agricultural Natural Resource Lands (Ag-NRL) and Rural Reserve (RRv)
Planning Area:	Unincorporated Skagit County

Shoreline Master Plan:	Skagit County Shoreline Master Program	Designation:	Project sited outside shoreline designations (see Section 4.6 of the Land Use Consistency Review, included as Attachment H)
Closest Surface Water:	Hansen Creek	Distance:	Project components are located greater than 200 feet away from either side of the center line of Hansen Creek, as demonstrated on Figure C1-1 in Attachment B
WRIA #:	03: Lower Skagit – Samish watershed		

Is the site a Natural Resource Land as designated by the county or city? Indicate yes or no for each type listed below.

Forest land	☒ No	☐ Yes	Agriculture	☐ No	☒ Yes	Mineral	☒ No	☐ Yes

Is the site, or land within 300 feet of the site, in a Critical Area as designated by the county or city? Indicate yes or no for each type listed below.

Wetland	☐ No	☒ Yes	Frequently flooded	☐ No	☒ Yes	Aquifer recharge	☒ No	☐ Yes
Geologic hazard	☒ No	☐ Yes	Habitat conservation	☐ No	☒ Yes	Other*	☒ No	☐ Yes

*If you indicated yes to Other, above, please provide Critical Area name(s):	

Is the site on a Local, State, or Federal Historic Register?	☒ No	☐ Yes	☐ Listed	☐ Proposed	☐ Eligible
Is the site identified as a non-tribal Local, State, or Federal Cultural Site? For tribal property/site designations, see section B.11.	☒ No	☐ Yes	☐ Listed	☐ Proposed	☐ Eligible

Do any other applicable plans or local/state/federal designations apply to the site? If yes, please specify below.	☒ No	☐ Yes

B.7. Land Uses Provide information for the following fields.					
Existing Land Uses	Primarily undeveloped and currently includes pasture fields and electrical infrastructure, with a small section of scrub/shrub habitat. A portion of the Project Area encompasses four existing structure, which the underlying landowner has agreed to demolish as part of Project construction.				
Past Known Land Uses	As discussed in Section 4.4 of the Cultural Resource Inventory (confidential, included as Attachment E), aerial imagery indicates past land uses in the Project Area are similar to current uses – one transmission line is documented between 1944 and 1953, with two more lines and the Sedro-Woolley Substation added between 1974 and 1981. Two structures are documented in 1956, with modifications documented in 1975, plus two more structures added in 1981 and 2019. Undeveloped areas and agricultural areas are documented throughout the Project Area dating back to 1956.				
Existing Adjacent Uses	North:	Minkler Road, then residential and agricultural			
	South:	Sedro-Woolley Substation, Hoehn Road, agricultural, open space			
	East:	Agricultural and residential			
	West:	Sedro-Woolley Substation, then residential			
B.8. Utilities					
B.8.a. Stormwater Management - Construction					
Would there be stormwater runoff during construction? If yes, fill out the fields below. If no, continue to B.8.b.				☐ No	☒ Yes
Source of runoff:	Rainfall and flooding events				
Quantity of runoff:	100-year, 24-hour storm event is 4.1”.				
Method of collection:	Sheet flow, channelized flow, and underground pipe network to detention pond. Industry standard SWPPP BMP devices to be installed and maintained until the site is stabilized.				
Drain/discharge to:	☐ Onsite	☐ Overland flow	Describe the plan for the options indicated.		
		☐ Engineered infiltration	Industry standard SWPPP BMP devices, meeting water quality and quantity requirements, are to be installed prior to construction.		
	☐ Offsite	☐ Utility	Describe the plan for the options indicated. If Utility was indicated, list the Utility name.		
		☐ Other	Site discharges to Hansen creek.		
Is a new facility, system, or line required? If yes, describe and locate on site map in the space below.				☐ No	☐ Yes
B.8.b. Stormwater Management - Operation					
Would there be stormwater runoff during operation? If yes, fill out the fields below. If no, continue to B.8.c.				☐ No	☒ Yes
Source of runoff:	Rainfall and flooding events				
Quantity of runoff:	100-year, 24-hour storm event is 4.1”.				
Method of collection:	Sheet flow, channelized flow and underground pipe network to detention pond.				
Drain/discharge to:	☐ Onsite	x Overland flow	Describe the plan for the options indicated.		

		☐ Engineered infiltration	A stormwater management area will be designed within the Project Area to capture stormwater runoff within the Project Area. This stormwater management area will be constructed in accordance with the most up-to-date edition of the Ecology SWMMWW and will follow requirements under SCC Chapter 14.32 as applicable including the utilization of Low Impact Development (LID) techniques. The Project is not expected to alter the normal movement of surface water in a manner that would cause the unnatural diversion of floodwater to otherwise flood-free area, following SCC 14.24.630. See Section 4.E and Attachment K for additional details.
	☐ Offsite	☐ Utility	Describe the plan for the options indicated. If Utility was indicated, list the Utility name.
		x Other	Site discharges to Hansen Creek.

Is a new facility, system, or line required? If yes, describe and locate on site map in the space below.	☐ No	☒ Yes
Storm sewer network and detention pond shown on site plan (see Attachment B for stormwater detention grading plan details).		

B.8.c. Energy

Would there be energy consumption? If yes, fill out the fields below. If no, continue to the following section on production.							☐ No	☒ Yes
☒ Electricity	Utility name:	Puget Sound Energy	☐ Natural gas	Utility name:		☐ Fuel	Type:	
Is a new facility, generator, line, or connection required? If yes, describe and locate on site map in the space below.							☐ No	☒ Yes
Energy will be taken from the grid at times of high energy production and low demand, and stored in the battery energy storage system. Energy will be returned to the grid at times of high demand and lower production. The process of storing and retransmitting the energy will require use of a portion of the energy and as a result, there will be a small amount of consumption for facility operation. A new gen-tie line will be installed as shown on Figure 2 in Attachment A.								
Would there be energy production? If yes, fill out the fields below. If no, continue to B.8.d.							☒ No	☐ Yes
☐ Electricity	Receiving Utility name:							
Is a new facility, generator, line, or connection required? If yes, describe and locate on site map in the space below, including length of new line, height of poles, and other pertinent details.							☐ No	☒ Yes
A new generation-tie line extending between the new Project substation and PSE's existing Sedro-Woolley Substation will be required. The 800-foot line will be installed underground. See Figure 2 in Attachment A.								

B.8.d. Water Use - Construction

Would there be water use during construction? If yes, fill out the fields below. If no, continue to B.8.e.		☐ No	☒ Yes
Gallons per day (or per use and use frequency) and use proposed:	Estimated 6,000 gallons per day during a 6-month portion of the construction period when water will be required for dust control, truck exit wash, and concrete mixing.		
Water source:	☒ Utility	Name:	Skagit Public Utilities Department
	☐ Surface water	Name:	
	☐ Private well		

	☐ Private water system	Name:	
Is a new well, diversion, line, or connection required? If yes, describe and locate on site map in the space below.		☒ No	☐ Yes

B.8.e. Water Use - Operation

Would there be water use during operation? If yes, fill out the fields below. If no, continue to B.8.f.		☒ No	☐ Yes
Gallons per day (or per use and use frequency) and use proposed:	No water would be required during routine operation. However, water supply would be provided to the facility for use in case of emergency.		
Water source:	☒ Utility	Name:	Skagit Public Utilities Department
	☐ Surface water	Name:	N/A
	☐ Private well		
	☐ Private water system	Name:	N/A
Is a new well, diversion, line, or connection required? If yes, describe and locate on site map in the space below.		☒ No	☐ Yes

A portion of the existing line will be upgraded to provide sufficient flow rates needed for fire protection. See Figure 2 in Attachment A. This line is shown for purposes of describing impacts but is not intended to be included in a site certificate for the facility as it will ultimately be owned and operated by Skagit Public Utilities Department.

B.8.f. Sanitary Waste Management

Would there be a need for sanitary waste management? If yes, fill out the fields below. If no, continue to B.9.			☐ No	☒ Yes
Gallons per day:	40 to 50 gallons per day during the 14-month construction period only			
Discharge to:	☐ Utility	Name:	N/A	
	☐ Septic system			
	☒ Other	Describe:	Portable toilets would be used during construction.	
Is a new system, line, or connection required? If yes, describe and locate on site map in the space below.			☒ No	☐ Yes

B.9. Emergency Service Providers Provide information for the following fields.

Police Services:	Skagit County Sheriff's Office
Fire Services:	Sedro-Woolley Fire Department and Skagit County Fire Protection Districts 6, 8, and 16.
Other Emergency Services:	

B.10. Transportation

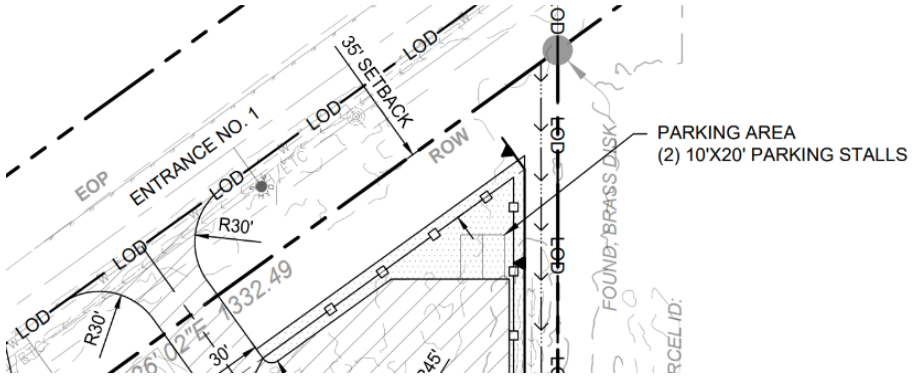
Will transportation methods other than roads/motorized vehicles be used to access the site (i.e. air, water, rail, pedestrians, bicycles, etc.)? If yes, describe in the space below.	☒ No	☐ Yes

What are the arterial roads serving the area of the project site?	

What type of vehicular traffic will be generated by the project? Provide information for the following fields.				
Construction	Round trips per day of vehicles:	56	Peak hour trips/day:	125
	Round trips per day of heavy equipment:	Average 5; maximum 40	Timing of peak hours:	Construction worker commutes 8-9 am and 4-5 pm, heavy equipment trips spread throughout the day
Operation	Round trips per day of vehicles:	<1	Peak hour trips/day:	<1
	Round trips per day of heavy equipment:	0	Timing of peak hours:	N/A

Are new public roads proposed? If yes, provide locations and describe in the space below.	☒ No	☐ Yes
Are any public road improvements proposed? If yes, provide locations and describe in the space below.	☒ No	☐ Yes
How much space currently exists for the parking of vehicles and/or heavy machinery?	None	
Will a new or expanded parking area be created during the project? If yes, describe and locate on site map in the space below.	☐ No	☒ Yes

Two parking stalls will be created in the northeast corner of the Project Area. See below and Drawing C1-1 in Attachment B.



B.11. Select Tribal Considerations

Are there any tribes that may have or claim particular rights to all or part of the project area? If yes, specify below.	☒ None Known	☐ Yes

Tribe	Contact	Date and Means of Contact	Outcome of Contact, Including Rights Asserted (If Any)

If applicable, note other tribal representatives, members, or specialists consulted regarding the project not listed in Part 1.E. or above.

Contact (Name, Program)	Address/Contact Information	Areas of Discussion	Status of Engagement

Do you know of any tribal-specific plant resources present on the site where abundance is limited elsewhere? If none are known to be on the site, check no. If yes, specify below.		☒ No	☐ Yes
Species Name	Listing Status	Source for Identification	
Do you know of any tribal-specific fish or wildlife resources present on the site where abundance is limited elsewhere? If none are known to be on the site, check no. If yes, specify below.		☒ No	☐ Yes
Species Name	Listing Status	Source for Identification	

References

County (Skagit County). 2023. Skagit County Comprehensive Plan Designations and Zoning Districts. Accessed January 2024. https://www.skagitcounty.net/GIS/Documents/CompPlan/Compplan36x60.pdf.

County. 2024. Skagit County Code. Accessed January 2024. https://www.codepublishing.com/WA/SkagitCounty/.

Part 3 – Screening Questions

A. Earth

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

A.1. Screening Question – Earth

Will the project occur in an area that contains…

- steep slopes, unstable soils, surface indications or history of unstable soils?
- other geologic hazard with the potential of landslide, mass wasting erosion, faulting, subsidence, or liquefaction?
- land identified in local ordinance as a designated geologic hazard critical area?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project Area features gentle slopes with elevations ranging from approximately 45 to 60 feet across the Project Area. The underground gen-tie line crosses Hansen Creek to connect the Goldeneye BESS to the Sedro-Woolley Substation, causing a drop in elevation of about 10 feet along the creek bed. In order to understand the geology present within the site pre-construction area, the Applicant has prepared a Geotechnical Engineering Report (see Attachment G) that describes the geology, soils, topography, and existing erosion patterns of the Project Area. The Geotechnical Engineering Report also provides information regarding geologic hazards that may affect the Project, including seismic hazards (e.g., ground shaking, surface fault rupture, soil liquefaction, and other secondary earthquake-related hazards), slope instability, flooding, ground subsidence, collapsible soils, corrosive soils, and erosion, as well as descriptors of the soil types and their compaction.

The USDA Natural Resources Conservation Service for Skagit County, Washington, identifies the site as containing Field Silt Loam, Minkler Silt Loam, and Sumas Silt Loam soils (Soil Survey Staff). Silts, gravels, and sands, all varying in silt content, were identified sitewide, exhibiting variability in composition, depth, and density (Attachment X). No evidence of surficial erosion has been found within the Project Area (Attachment G).

The Project Area is located in Skagit County, Washington, where regulated geologically hazardous areas could include erosion, landslide, earthquake, or other geological hazards. Geologically Critical Areas are defined in Skagit County's critical areas code, specifically SCC 14.24.400-430. The following assessment considers site conditions for the presence of each of these identified features:

- **Erosion Hazard Area**: The Project Area is not at risk for erosion hazards as none of the criteria listed within SCC 14.24.410(1) are applicable (including slopes greater than 30 percent, containing coastal beaches or bluffs, special areas identified by varying governing bodies, not susceptible to rapid stream incision and bank erosion, etc.).

The Project Area's slopes are less than 30 percent and the site's identified soils are not listed as erosion-prone according to the referenced SCC. The erosion potential of the on-site soils is "not rated" at the time of this assessment and no erosion of these materials was noted on-site during several visits. However, the site's soils will be susceptible to erosion when exposed during construction. Proper implementation and maintenance of best management practices (BMPs) for erosion prevention and sedimentation control will adequately mitigate the erosion potential in the planned development area (Attachment G). Erosion protection measures as required by Skagit County will also be in place prior to and during grading activity on the site.

- **Landslide Hazard Area**: The Project Area does not contain any of the criteria listed in SCC 14.24.410 (2) for landslide hazard areas (Attachment G). These criteria include slopes greater than 15 percent that meet identified criteria, areas of previous failure, potentially unstable areas resulting from rapid stream incision, coastal bluffs, and other specific considerations identified in SCC 14.24.410(2) as listed in Attachment X. Accordingly, the site does not fall within a Landslide Hazard Area.
- **Seismic Hazard Area**: The Project Area is not within ¼ mile of an active fault and is not at risk of tsunami or seiche hazards. However, the site is identified as moderately to highly susceptible to liquefaction due to seismic activity based on Skagit County's Liquefaction Susceptibility Map (Attachment X). To address this, seismic design will adhere to procedures outlined in the 2018 International Building Code (IBC). According to the IBC, structures on Site Class E sites, as per ASCE 7-16, must be designed to withstand earthquake motions (Attachment G). Anticipated liquefaction settlements within the Project Area are expected to be within acceptable limits (up to 4 inches). As a result, ground improvement techniques for liquefaction mitigation are not anticipated to be necessary for site development. Liquefaction risks are addressed further in Part 4.
- **Volcanic Hazard Area**: The volcanic hazard risk at this site is considered negligible (Attachment G). As defined in SCC 14.24.410 (4), a site assessment is not required for volcanic hazard areas unless other specific criteria apply.
- **Mine Hazard Area**: The Washington State Department of Natural Resources' (DNR) Inactive and Abandoned Mines map identifies mines. A project is deemed in a mine hazard area if it falls within 200 feet of any current or historic mine operations flagged as geologically hazardous by the Administrative Official. However, the risk of mine hazards for the Project Area is minimal as there are no such features within 200 feet. Additionally, there are no listed inactive or abandoned mines in greater Skagit County, according to DNR (2024).

Based on the above assessment, a Part 4 Detailed Analysis is required to further define the potential risks and areas of disturbance due to geologic hazards within or surrounding the site, particularly focusing on possible seismic activity. Mitigation techniques for geologic hazards will be described in Part 4 as well.

References:

DNR (Washington State Department of Natural Resources). 2024. Geologic Hazard Maps. Available online at: https://www.dnr.wa.gov/programs-and-services/geology/geologic-hazards/geologic-hazard-maps (Accessed February 2024).

Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at: http://websoilsurvey.sc.egov.usda.gov/ (Accessed February 2024).

As you complete the Detailed Analysis in Part 4.A. Earth, make sure you consider and address:

How the project could/would:

- Disturb the area(s)
- Be at risk from the area(s) in their current condition
- Be at risk from the area(s) if it degrades further
- Increase water flow over or through the area(s)

Other relevant factors addressed in:

- WAC 463-60-265: describe the means to be employed for protection of the facility from earthquakes, volcanic eruption, flood, tsunami, storms, avalanche or landslides, and other major natural descriptive occurrences.
- WAC 463-60-302, (1) and (2)
- WAC 463-62-020 regarding seismicity standards

B. Air Quality

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

B.1. Screening Question – Air Quality

Will the project have…

- indoor or outdoor air pollution emissions, including dust, other than those related to vehicle emissions during operation?
- the potential to produce an odor nuisance?
- emissions, including dust, during construction?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project will not create an odor nuisance and will not have any indoor or outdoor air pollution emissions during operation, other than those related to minimal vehicle emissions during periodic maintenance of the facility. The Project will involve the use of heavy equipment during construction, potentially leading to air pollution emissions from vehicle exhaust and dust generation within construction areas and along Project roads. Dust control measures, such as water spraying, binding agents, or gravel application, will be employed to mitigate these impacts.

A Part 4 analysis is provided with this ASC, addressing anticipated air pollution emissions during construction and will outline measures to minimize these impacts.

As you complete the Detailed Analysis in Part 4.B. Air Quality, make sure you consider and address:

- Health hazards
- That all project equipment and vehicles are assessed collectively for air emissions
- The area's existing/potential air quality issues (failure to meet standards, haze, aesthetics, etc.)
- Proximity to populated areas, recreational areas, or other areas of sensitivity

Other relevant factors addressed in:

- WAC 463-62-020 regarding air quality laws and regulations
- WAC 463-60-225 (1) through (3)
- Guidance regarding information required by WAC 463-60-312.

C. Water Quality – Wetlands and Surface Waters (Buffers, Fill, Dredging, & Sedimentation)

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

C.1. Screening Question – Water Quality – Wetlands and Surface Waters

Will the proposal involve any activities…

- on a steep slope, or area of unstable soils?
- within a surface water body, wetland, or within 300 feet of those areas?
- within a floodplain, or an area known to flood?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

Floodplain: The Project is located entirely within a FEMA mapped floodplain, and Project construction will require extensive grading to elevate the proposed Project facilities above the floodplain.

Wetlands: A wetland delineation was conducted over several site visits in March and April 2023. The delineation resulted in 1.18 acres of wetlands mapped within the Project development area. Seven individual wetlands were identified, all being palustrine emergent or palustrine emergent/scrub-shrub, based on the Cowardin classification method. These wetlands have depressional hydrology based on the hydrogeomorphic classification method, receiving their hydrology primarily from groundwater, interflow and overland flow from adjacent land, and direct precipitation. One wetland also has riverine hydrology, as it is hydrologically connected to and likely receives floodwater from an unnamed ditch along the east and south sides of the Project site. All mapped wetlands would be displaced during Project construction.

A Part 4 analysis is provided with this ASC, addressing anticipated impacts to wetlands and floodplain, and will outline measures to minimize and mitigate these impacts.

As you complete the Detailed Analysis in Part 4.C. Water Quality – Wetlands and Surface Waters, make sure you consider and address:

- Erosion/erosion control
- Existing/potential water quality issues (temperature, turbidity, sedimentation, etc.)
- Loss of wetland/surface water functions and values (flood control, groundwater recharge, water quality, fish and wildlife habitat, aesthetics, recreation, etc.)
- Existing/potential flood risks

Other relevant factors addressed in:

- WAC 463-62-050 starts for wetland impact mitigation
- WAC 460-62-060-060 regarding water quality standards
- WAC 463-60-255, 463-60-322 (1-5), and 463-60-333

D. Water Quality – Wastewater Discharges

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

D.1. Screening Question – Water Quality – Wastewater Discharges

Will the proposal discharge wastewater (septic systems, process waters, dairy waste, etc.) to onsite or offsite surface waters, wetlands, or the ground?

- Do not include discharges to utilities or county-approved septic systems.

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

Up to approximately 730,000 gallons of water could be used during Project construction. Water use for Project construction will be obtained from the Skagit PUD through an existing waterline in Minkler Road. A sanitary water supply will not be required (or discharged) during construction, as restroom facilities will be provided by portable units that will be serviced by licensed providers and disposed at a licensed wastewater treatment facility, and therefore will not result in discharge to onsite or offsite surface waters, wetlands, or the ground. Water will be used for common construction-related purposes, primarily consisting of dust control, truck wash, and concrete mixing. No wastewater will be discharged on site.

Minimal ongoing operational water consumption is required. The Project will not utilize a septic system and will only utilize water to maintain surrounding vegetation and in the event of a fire. Therefore, because minimal discharge wastewater will be produced, a detailed Part 4 analysis is not required.

As you complete the Detailed Analysis in Part 4.D. Water Quality – Wastewater Discharges, make sure you consider and address:

- Existing/potential water quality issues (nutrients, bacteria, metals, turbidity, temperature, etc.)
- Loss of wetland/surface water functions and values
- Discharge type (wash water), volume, potential contaminants, location, and method of discharge.
- Sole source aquifers

Other relevant factors addressed in:

- WAC 460-62-060 regarding water quality standards
- WAC 463-60-322 and 463-60-333.

E. Water Quality – Stormwater Runoff

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

E.1. Screening Question – Water Quality – Stormwater Runoff

Does the proposal involve any potential sources of stormwater contamination from…

- drainage from impervious surfaces?
- erosion from disturbed soils, lost vegetation, etc.?
- animal wastes, fertilizers, or decomposing organic material?
- pesticides or other chemical usage?
- other sources?

☐ No	Explain below why you believe “No” is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a “Yes” response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive “Yes” or “No” prior to the final submission of your application.

The Project may result in stormwater drainage as a result of new impervious surfaces developed and identified in Part 2, Section A.2.3 (e.g., BESS units, substation components, etc.). The total new impervious surface area from the BESS units, substation, and associated inverters and transformers covers 10.1 acres. These new impermeable surfaces may affect stormwater runoff and will require implementation of stormwater management measures to prevent erosion of disturbed soils. Additionally, the Project is expected to affect existing wetlands and surface water flow. Ethylene glycol, refrigerant, and lubricating oils will be kept on site in small quantities. Pesticides and herbicides may be brought on site in small quantities by a trained specialty contractor for weed or pest management as needed.

Animal waste, fertilizer, and decomposing organic material will not be used on-site and therefore will not affect stormwater runoff.

The Part 4 analysis details the effects that the Project will have to existing wetlands and surface water functions through the creation of new impervious surfaces and the infrastructure elements of the Project.

As you complete the Detailed Analysis in Part 4.E. Water Quality – Stormwater Runoff, make sure you consider and address:

- Existing/potential water quality issues (oil and grease, turbidity, sedimentation, nutrients, metals, and other pollutants)
- Loss of wetland/surface water functions and values

Other relevant factors addressed in:

- WAC 460-62-060 regarding water quality standards
- WAC 463-60-215 and 463-60-322

F. Water Quantity – Water Use

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

F.1. Screening Question – Water Quality – Water Use

Will the proposal involve a new withdrawal, diversion, retention, or use for water not received from a utility?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

No water will be obtained from sources other than a utility. Stormwater is addressed in Parts 3.E, 4.E, 3.G, and 4.G.

As you complete the Detailed Analysis in Part 4.F. Water Quality – Water Use, make sure you consider and address:

- Changes in flow or volume
- Existing/potential water quantity/ availability issues (water right controversy, endangered aquatic species, high ground water table, etc.)

Other relevant factors addressed in:

- WAC 463-60-165 (1) and (3), 463-60-322 and 463-60-333

G. Water Quantity – Runoff, Stormwater & Point Discharges

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

G.1. Screening Question – Water Quality – Runoff, Stormwater & Point Discharges

Is the project likely to result in changes in flow or volume in any water body or aquifer?

- Consider changes in vegetation, blocking of recharge by new impervious surfaces, grading, filling, discharges, water use, etc.

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project will include grading, changes in vegetation and the development of new impervious surfaces identified in Part 2, Section A.2.3 (e.g., BESS units, substation components, etc.). The total new impervious surface areas will cover 10.1 acres. Without mitigation measures, these new impermeable surfaces could result in changes in flow or volume to Hansen Creek that flows adjacent to the Project as well as groundwater recharge. Additionally, the Project is expected to affect existing wetlands and surface water flow through proposed stormwater infrastructure (see grading plans in Attachment B).

Effects to these resources may be significant. The Part 4.G analysis will address the potential for changes in flow or volume to Hansen Creek as well as effects to groundwater recharge from the new impervious surfaces, proposed stormwater infrastructure, and expected effects to existing wetlands.

As you complete the Detailed Analysis in Part 4.G. Water Quality – Runoff, Stormwater & Point Discharges, make sure you consider and address:

- Potential loss of groundwater recharge
- Change in seasonal stream flow
- Existing/potential flood risks
- Existing/potential water quantity/ availability issues

Other relevant factors addressed in:

- WAC 463-60-215, 463-60-322 and 463-60-333

H. Plants

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

H.1. Screening Question – Plants

Will the project occur in or near an area with special status plants, (e.g. DNR natural heritage program or WDFW Priority Habitats and Species (PHS))?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The USFWS IPaC database (USFWS 2023), WDFW portal, and Washington Natural Heritage Program (WNHP) Element Occurrence database were reviewed to determine the potential for special-status plant species to occur in the project study area. Special-status plant species include federally listed and candidate vascular plant species, as well as vascular plant species that are listed in Washington state as endangered, threatened, or designated as sensitive by the WNHP. Based on the literature review and database search, no special-status plants were identified as having known occurrences (i.e., within 5 miles of the project site) or a potential to occur within the project site. Areas of special-status plant species and high-quality ecosystems as identified by the WDNR, through the WNHP, were not identified within the project site (Critical Areas Ordinance [CAO] 14.24.500(I)). A list of special-status species reviewed for their potential to occur is provided in Appendix C, Special-Status Plant Species with a Potential to Occur within the Project Site, of the Critical Areas Report prepared for the proposed Project (see Attachment J). No special-status plant species were observed during the reconnaissance-level biological field surveys that occurred in spring of 2022 and 2023. Although the site surveys occurred earlier than the blooming period for most of the special-status species listed in Appendix C, based on site conditions (maintained agricultural lands), necessary habitat for each species (i.e. vegetation communities, elevation ranges) and review of applicable databases, no special-status plant species are expected to occur within the project site and focused surveys are not necessary.

Based on this review, a Part 4 detailed analysis is not recommended.

Reference:

USFWS. 2023. "Information for Planning and Consultation (IPaC)" [Database and project planning tool]. Available online at: https://ecos.fws.gov/ipac/.

As you complete the Detailed Analysis in Part 4.H. Plants, make sure you consider and address:

- Alteration/loss of fish/wildlife habitat
- Endangered, threatened, or other at-risk plant species
- Changes to critical areas are reflected in Part 4-8.C.1.

Other relevant factors addressed in:

- WAC 463-60-332

I. Animals

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

I.1. Screening Question – Animals

Will the project occur in or near an area with migration areas, special status wildlife or habitats (e.g. WDFW Priority Habitats and Species (PHS))?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

Based on an initial literature review, database search, and a reconnaissance-level biological survey, habitat within the Project site provides a potential for the following special-status wildlife to occur: Chinook salmon (federally threatened [FT]), steelhead (FT, species of concern [SC]), bull trout (FT, SC), Dolly Varden (migration only; FT), western toad (SC), little brown bat (federally endangered [FE], state endangered [SE]), Townsend's big-eared bat (FE, federal candidate [FC]), and Yuma myotis (FE, SE). Hansen Creek likely supports sensitive fish species; however, the creek will not be impacted by the proposed Project. Potential habitat for the little brown bat includes the outbuildings at the west end of the property and trees at the edges of the property. No bat activity has been detected during surveys. Western toad has a moderate potential to occur within the project site because it can occupy a wide range of habitats, including woodlands. Ponded wetlands also occur on site, which could support the species.

As the proposed Project will occur in an area that may include special status wildlife and migration corridors, a Part 4 analysis is provided with this ASC to identify any endangered or other at-risk species onsite, any impact to habitat for these species, and to outline measures to minimize these impacts.

As you complete the Detailed Analysis in Part 4.I. Animals, make sure you consider and address:

- Alteration/loss of fish/wildlife habitat
- Endangered or other at-risk animal species
- Obstructions/barriers to the movement of fish and wildlife, especially known wildlife corridors
- Noise, light, or glare effects on wildlife
- Changes to critical areas are reflected in Part 4-9.C.1.

Other relevant factors addressed in:

- WAC 463-62-040 regarding fish and wildlife mitigation
- WAC 463-60-332

J. Energy and Other Natural Resources

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

J.1. Screening Question – Energy and Other Natural Resources

Will the project, because of type, size, or design, require the consumption or removal of considerable quantities of natural resources including energy (electricity, petroleum, etc.), rock minerals, trees/wood, peat, etc. during either construction or operation?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

As a standalone BESS facility, the Project will only be storing electricity, not generating any new power or consuming ongoing resources. Rechargeable lithium-ion batteries with a 10-year lifespan will be used for the BESS, as are generally used in utility-scale applications. The Project is designed to be supportive of and take advantage of the region's renewable solar energy resources and adjacent transmission interconnection. The Project design minimizes impacts to adjacent properties and will not limit or otherwise affect the potential use of solar energy at nearby properties.

The Project will not require consumption or removal of substantial quantities of natural resources during construction or operations; however, some natural resources will be consumed in the form of non-renewable construction materials (see Part 2). Non-renewable fossil fuels will also be required to fuel construction vehicles, equipment, and operational vehicles. Fossil fuel quantities consumed will be typical of commercial construction facilities of a similar size. Electricity for the Project's lighting (for security and occasional after-hours work) and charging will be provided by the local electric transmission system, PSE. Local service providers will be able to accommodate the materials, electricity, and fuel needs of the Project.

The Project Area falls on undeveloped land and does not require removal of considerable quantities of trees for the construction or operation of the facility. Additional discussion of impacts to vegetation is provided in Section 4.H.

No detailed Part 4 analysis is warranted because the Project will not require the consumption or removal of substantial quantities of energy or natural resources during construction or operations.

As you complete the Detailed Analysis in Part 4.J. Energy and Other Natural Resources, make sure you consider and address:

- Existing/potential of resource supply not meeting demand
- Conservation methods
- Use of renewable vs. non-renewable resources

Other relevant factors addressed in:

- WAC 463-60-342 (1)-(4)

K. Waste Management

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

K.1. Screening Question – Waste Management

Will the project generate large quantities of waste, during either construction or operation, other than those listed as a discharge under B. Air Quality or D. Water Quality – Wastewater Discharges?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project will generate waste during both construction and operation.

During construction, solid waste quantities will resemble those of similar-sized commercial projects. Construction waste will not be generated in large quantities. Typical construction waste includes discarded building materials such as metal, concrete, wiring scraps, and plastic packaging, all of which will be recycled where feasible.

During operation, maintenance and replacement of Project components will result in generation of limited quantities of waste, notably from lithium-ion batteries. During the expected 20-year lifetime of the Project, batteries will not be replaced, but supplemental batteries will be added as performance of the original batteries gradually degrades. Limited numbers of batteries may be replaced during operation based on specific performance criteria. Batteries will be recycled or disposed of following proper methods approved by the Washington State Department of Ecology. New opportunities for recycling outdated BESS parts will be utilized when possible.

Upon decommissioning, all of the Project's lithium-ion batteries will be disposed of in accordance with applicable regulations at the time of decommissioning. Equipment and materials will be salvaged or recycled whenever possible, with remaining materials disposed of at authorized sites in compliance with regulations. See Attachment D for a preliminary decommissioning plan for the Project.

Throughout its lifecycle, the Project will generate battery waste during operation and decommissioning that will be managed following the procedure outlined above. Because the Project will not generate significant amounts of waste during construction or operation, a detailed Part 4 analysis is not necessary.

As you complete the Detailed Analysis in Part 4.K. Waste Management, make sure you consider and address:

- Landfill capacity
- Loss of resources
- Opportunities to reduce, reuse, or recycle waste
- The utility of a comprehensive solid waste management plan

L. Environmental Health – Existing Site Contamination

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

L.1. Screening Question – Environmental Health – Existing Site Contamination

Is there any evidence that the project site(s) contain(s) potentially hazardous materials including toxic chemicals, volatile gases or other poisonous or hazardous substances?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The majority of the main Project Area has never been developed for residential or commercial purposes. It was used for agricultural purposes from 1941 until the 1970s and has been an open field since the 1970s. A Phase I Environmental Site Assessment (ESA; Dudek 2022) was completed for the majority of the Project Area in 2022. The assessment identified potential contamination on adjacent properties, including some areas where Project components are now planned. These findings include the following:

- A septic leach field, installed in 1973, is attached to a septic system on one of the residences that will be demolished as part of the Project.
- A commercial chicken farm, in operation for more than 20 years, is located on the eastern adjoining property. Toxic substances from this farm may have migrated into the Project Area.
- The PSE Sedro-Woolley Substation property, to which the proposed Project will connect, had transformer leaks in 1994. Soil and groundwater sampling were conducted and a soil cleanup effort was completed. Groundwater contamination is suspected, as groundwater has not been fully characterized.
- The owner of a property located northwest of the Project Area has been storing and working on vehicles for many years, accumulating up to 400 cars at one time. Soil samples collected in 2006 identified petroleum and chromium contamination in site soils. Groundwater contamination is suspected and contaminated groundwater could be migrating toward the Project Area.

Based on the findings of the 2022 Phase I ESA, further investigation of the subsurface conditions within the Project Area is recommended to evaluate potential impacts due to identified recognized environmental conditions (RECs).

Because the Project Area requires additional testing to ensure that it is not contaminated with hazardous material, a detailed Part 4 analysis will be completed.

References:

Dudek. 2022. Phase I Environmental Site Assessment. Goldeneye Energy Storage Project, Minkler Road, Sedro-Woolley, Washington, 98283. Prepared for Goldfinch Energy Storage, LLC. April.

As you complete the Detailed Analysis in Part 4.L. Environmental Health – Existing Site Contamination, make sure you consider and address:

- Public health and safety
- Environmental health (air, soils, ground water, surface waters, plants, and animals)
- Conflict /compatibility with planned land uses
- Include description of hazardous materials and the manner and extent of the contamination.

M. Environmental Health – Hazardous Materials

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

M.1. Screening Question – Environmental Health – Hazardous Materials

Will the project involve the removal, use, or disposal of hazardous materials that involve toxic chemicals, asbestos, risk of fire or explosion, and/or spill or danger to public health and the environment?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project would involve use and eventually dispose of lithium-ion battery modules, which could present a risk of fire or explosion. Consequently, a Part 4 detailed analysis will be prepared.

As you complete the Detailed Analysis in Part 4.M. Environmental Health – Hazardous Materials, make sure you consider and address:

- Public Safety
- Environmental health (air, soils, ground water, surface waters, plants and animals)
- Hazardous material sources, storage, identification, classification

Other relevant factors addressed in:

- WAC 463-60-352 (2) – (4), (6)

N. Land Use, Natural Resource Lands, & Shoreline Compatibility

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

N.1. Screening Question – Land Use, Natural Resource Lands, & Shoreline Compatibility

Will the proposal involve or result in any of the following:

- Change in land use
- Change in intensity of land use
- Provide new or improved service to an area (e.g. transportation, utilities, entertainment, etc.)

Include likely future proposals that will occur as a result of this action, such as increased development from newly created lots or extension of services, etc.

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project location was selected by the Applicant for its proximity to the point of interconnection (the Sedro-Woolley Substation) and other existing electrical transmission infrastructure that bisect the Project Area. Current land uses in the Project Area include pasture fields, with a small section of scrub/shrub habitat near the southeastern tip. A portion of the Project Area also contains four existing structures, which the underlying landowner has agreed to demolish as part of Project construction. Land Uses surrounding the Project Area include pastureland, infrastructure, and 10 single-family residences (7 within 500 feet of the BESS facility fence line and 3 within 500 feet of the underground transmission line right-of-way and access road easement). The location of residences in relation to the Project Area is shown on Figure 3 in Attachment A.

The proposed Project will result in a change in the type and intensity of the existing land use in the Project Area because it would convert the current pasture and residential areas within the Project Area to use as a major utility development that would store electrical energy.

The Land Use Consistency Review (Attachment H) provides a complete review of the Project's compliance with the Skagit County Comprehensive Plan and SCC. The Part 4 analysis addresses the Project's potential effects to existing and nearby land uses, as well as the Project's compliance with applicable local land use regulations.

References:

County (Skagit County). 2023. Skagit County Comprehensive Plan Designations and Zoning Districts. Available online at: https://www.skagitcounty.net/GIS/Documents/CompPlan/Compplan36x60.pdf (Accessed January 2024).

As you complete the Detailed Analysis in Part 4.N. Land Use, Natural Resource Lands, & Shoreline Compatibility, make sure you consider and address:

- Loss of designated natural resource lands (agriculture, forest, mineral) under RCW 36.70A.030; or other existing land uses.
- Viability of existing or planned adjacent or nearby land or water uses.
- Compatibility or conflict with intended land or shoreline uses.
- Increased transportation, utility, or service demands.
- Effects to surrounding working farm or forest land normal business operations such as oversize equipment access, the application of pesticides, tilling, and harvesting.

O. Housing

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

O.1. Screening Question – Housing

Will the project be likely to displace or otherwise affect existing or future housing, particularly housing for low and moderate-income households?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project is expected to have a negligible impact on existing and future housing. This assessment is based on the land-use expectations of the County in the Project Area, the low volume of Project staff required, existing housing units, and the suitable amount of temporary housing located within driving distance of Sedro-Woolley.

As indicated by the County's comprehensive plan and zoning designation of the Project location as Agricultural—Natural Resource Lands (Ag-NRL), the use of the land is intended to be non-urban and primarily agricultural-focused (Attachment H). The Project is located on the outskirts of the small city of Sedro-Woolley in Skagit County, outside of Sedro-Woolley's urban growth area boundary, suggesting limited urban infrastructure and low-density development patterns (County 2024). The purpose of the Ag-NRL zone is to provide land for continued farming activities, conserve agricultural land, and reaffirm agricultural use, activities, and operations as the primary use of the district. New housing is limited to a single-family detached residential dwelling unit and residential accessory uses when they are accessory to an agricultural use (SCC 14.16.400).

The Project staff and their housing needs are also not expected to significantly affect the housing market in Skagit County. During construction, the on-site construction workforce is expected to range from approximately 20 to a maximum of up to 80 individuals; however, the average daily workforce on site during construction is expected to be 50 individuals, comprising construction, supervisory, support, and construction management personnel. It is anticipated that the construction workforce will be hired entirely from the local population and will commute to the site each day from their residences in local communities.

Up to four full-time, locally-based personnel will be on-site during Project operations. These workers and their families are likely to reside within daily commuting distance and will either already reside in the area or permanently relocate. Although staff are generally expected to be hired from the local population, this analysis makes a conservative assumption that two of the full-time permanent staff and their families will relocate from outside the local area. The average U.S. family household consisted of 3.13 people per family in 2023 (U.S. Census Bureau 2023a). Applying this average household size results in an estimated maximum of 7 people (6.26 people rounded up) that could permanently relocate to the Project vicinity to support Project operation. The U.S. Census Bureau reports that Skagit County contains 57,126 housing units as of July 1, 2022 (U.S. Census Bureau 2023b). Skagit County has a low rental vacancy rate of 2 percent, which included 6,314 vacant housing units available in 2022 (U.S. Census Bureau 2023c) and with additional units classified for seasonal, recreational, or occasional use that may also be available. Despite low vacancies, this is suitable availability for long-term housing given for the small number of staff (two) potentially relocating to maintain the Project's operations.

As described in Part 1.C., the Project Area encompasses four existing structures, which the underlying landowner has agreed to demolish as part of Project construction. According to the Skagit County Assessor's Office, the Project Area is assessed as containing a 1974 dwelling with three bedrooms, a 1910 dwelling with two bedrooms and accessory structures (SCAO 2024). These homes were not constructed with federal low-income housing tax credits and do not qualify as "low income housing" per WAC 458-61A-218(2). WAC 365-196-410(2)(e)(i)(C) provides the following definitions:

> *(III) Low-income refers to a household whose income is between 30 percent and 50 percent of the median income, adjusted for household size, for the county where the housing unit is located.*
>
> *(IV) Moderate-income refers to a household whose income is between 50 percent and 80 percent of the median income where the housing unit is located.*

The projected 2022 Washington State Median Household Income Estimate for Skagit County was $67,316 (OFM 2023). Therefore, when adjusted for inflation, the Applicant estimates low-income refers to a household income between $21,553 and $35,921 ($20,195 and $33,658 in 2022 dollars) and a moderate-income refers to a household income between $35,921 and $57,474 ($33,658 and $53,853 in 2022 dollars). Using a 9-mile radius around the Project Area, three-bedroom homes are advertised for rent at a minimum of $2,400 a month, while two-bedroom homes are advertised for a minimum of $1,400 a month (Zillow 2024). If spending on housing was limited to 30 percent of their household income, a household at the high end of the moderate-income threshold could spend $1,436 a month on housing.

The existing homes make up a very small portion (0.0035 percent) of the total 2022 housing units. While the removal of these homes may reduce available housing for a moderate-income household by one house, when compared to the 6,314 vacant housing units available, the impact to housing availability is negligible. This, combined with the small number of permanent operation staff needed, there is sufficient existing available housing to accommodate new permanent residents in the Project vicinity.

Other visitors during Project operations will include trained technicians to service the BESS units and associated equipment once per month, along with an annual performance auditor's visit. These staff will be hired locally or hired to travel to the site for visits and will utilize available temporary accommodations including hotels and motels in Sedro-Woolley, Burlington, or other nearby communities.

As described above, all construction personnel and all but potentially two of the permanent operations staff are expected to be hired locally, and based on the current land-use expectations of the County, the Project is not anticipated to displace or otherwise affect existing or future housing during construction or operations. Therefore, a Part 4 detailed analysis of housing impacts is not required for this resource.

References:

County (Skagit County). 2024. Skagit County Geographic Information Services Map Gallery. Sedro-Woolley Urban Growth Area map. Accessed January 2024. Available online at: https://www.skagitcounty.net/departments/gis/gallery/main.htm#uga

SCAO (Skagit County Assessor's Office). 2024. Property Search, Assessor Information, Taxes, Land Improvements, Value History, Permits. Accessed April 2024. Available online at: https://www.skagitcounty.net/Search/Property/?id=P40030

OFM (Office of Financial Management). 2023. Median household income estimates. Washington State Office of Financial Management. Updated May 22, 2023. Available online at: https://ofm.wa.gov/washington-data-research/economy-and-labor-force/median-household-income-estimates

U.S. Census Bureau. 2023a. HH-6. Average Population Per Household and Family: 1940 to Present. Current Population Survey, Annual Social and Economic Supplements, 1940 and 1947 to 2023. November 2023. Available online at: https://www.census.gov/data/tables/time-series/demo/families/households.html.

U.S. Census Bureau. 2023b. QuickFacts- Skagit County, Washington. Accessed January 2024. Available online at: https://www.census.gov/quickfacts/fact/table/skagitcountywashington/HSG445222#HSG445222.

U.S. Census Bureau. 2023c. U.S. Census Bureau: American Community Survey (ACS) - Explore Census Data. Table DP04. Accessed January 2024. Available online at: https://data.census.gov/table/ACSDP1Y2022.DP04?text=Table%20dp04&g=010XX00US_040XX00US53_050XX00US53057

Zillow. 2024. Zillow. Accessed April 2024. Available online at: https://www.zillow.com/homes/for_rent/

As you complete the Detailed Analysis in Part 4.O. Housing, make sure you consider and address:

- Decreased availability of housing for low to moderate income households
- Impediments to meeting fair housing and/or population growth goals

P. Noise, Light, Glare, and Aesthetics

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

P.1. Screening Question – Noise, Light, Glare, and Aesthetics

Will the project transmit light, glare, or noise onto adjacent areas or alter or obstruct any views in the immediate area?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

Noise: The proposed Project will consist of electrical equipment: battery energy storage modules with heating, ventilation, and air conditioning equipment; inverters; medium voltage transformers; and a high voltage transformer. This equipment will emit noise during operation. When aggregated together, the project noise emissions may rise to a significant level in accordance with WAC 463-62-030, and will require a further analysis in order to determine if aggregated operational noise emissions are significant. A Part 4 analysis is provided with this ASC, addressing anticipated noise emissions during construction and operation and will outline measures to minimize these impacts.

Light: As the project will be an unstaffed facility and will be remotely operated, there will be no need for lighting along the project perimeter. Lighting will exist in the project interior for nighttime emergency access or maintenance activities and will be switch activated. Lighting will be provided at the project entrances/exits, will be downward focused, and will be switched via a dusk to dawn sensor. As the project will have no significant light emissions, a Part 4 analysis is not being prepared to address light emissions.

Glare: As the project would not include any elements that would create any glare, a Part 4 analysis is not being prepared to address glare.

Aesthetics: The project is proposed in an agriculturally zoned area, with other nearby rural residential uses. Although the Project is not located in an area with scenic views, it is proximate to, and will have an impact to the viewshed of several residences located directly across Minkler Road. To evaluate the Project viewshed impacts, a series of photos were taken from Minkler Road. Visual simulations were prepared from these photos, and it was determined that the visual impacts to the adjacent residences and public right-of-way could be significant and should be further analyzed. A Part 4 analysis is provided with this ASC, addressing anticipated aesthetic impacts and will outline measures to minimize these impacts.

As you complete the Detailed Analysis in Part 4.P. Noise, Light, Glare, and Aesthetics, make sure you consider and address:

- Proximity to residential areas, or other areas with sensitivity
- Scenic views that could be blocked, altered, or impaired for existing or planned uses in adjacent areas
- Glare affecting FAA flight paths

Other relevant factors addressed in:

- WAC 463-62-030 regarding noise standards
- WAC 463-60-352 (1), 463-60-362 (2) and (3)

Q. Recreation

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

Q.1. Screening Question – Recreation

Will the project occur in an area or location that…

- includes existing designated and informal recreation opportunities in the immediate vicinity?
- displaces or otherwise affects any existing recreational uses during construction or operation?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project will not significantly affect the area's resources because it does not occur within an area with existing designated or informal recreation opportunities and will not displace such opportunities during construction or operation.

All Project parcels are zoned as Ag-NRL. The Project Area primarily consists of undeveloped pasture fields, with a small section of scrub/shrub habitat near the southeastern tip. Some existing residences within the Project Area will be removed during Project construction. Surrounding land uses include rural single-family residences, pastureland, and infrastructure. The land utilized within the Project Area by the Project will have no impact on recreation opportunities in its immediate vicinity.

Hansen Creek, a waterbody known for sport fishing, lies approximately 400 feet west of the proposed BESS units and between the proposed BESS and the existing PSE Sedro-Woolley Substation. The portion of Hansen Creek adjacent to the Project Area is not open to the public for recreational fishing. An underground 230-kV gen-tie transmission line, approximately 0.4 mile long, will connect the Project substation to the existing Sedro-Woolley Substation. Temporary impacts from staging and installation of the transmission line may affect riparian zones surrounding Hansen Creek, but the line will be entirely underground once installed, resulting in no permanent impacts. The construction and operation of the gen-tie line is not expected to affect Hansen Creek's fish populations (see discussion of surface water and aquatic species impacts in Parts 4.C and 4.I). Stormwater features will be installed at the site to prevent erosion and sedimentation that could affect water quality in Hansen's Creek (see detailed discussion in Parts 4.E and 4.G).

The Skagit River, another fishing destination, runs approximately 1.2 miles south of the Project Area and will not be affected by the Project due to its distance from the site.

Skiyou Island and Skiyou Slough Conservation Area are located slightly over 1 mile southeast of the Project Area. Skiyou Island, managed by the U.S. Forest Service, provides private lands hunting access but does not extend closer than 1 mile to the proposed Project Area boundary, thus avoiding impacts from construction or operations. Skiyou Slough Conservation Area, protecting 27 acres of riparian forest within the Skagit River floodplain, will also remain unaffected by the Project.

Other nearby formal recreation areas include the Sedro-Woolley Rodeo Grounds (0.6 mile northwest of Project Area), the Cascade Trailhead at Fruitdale and Moore Street (0.65 mile northwest of Project Area), and the Gateway Golf Course (1 mile northwest of Project Area). Northern State Recreation Area is approximately 1.5 miles north-northeast of the Project Area. These areas are too distant from the Project Area to be affected by construction or operations, and due to the flat landscape and intervening vegetation and structures, the Project will not be visible from any of them (see Attachment P and Part 4.P.2 for additional information on visual impacts from the Project). There are no other significant recreation areas adjacent to or within 1 mile of the Project Area.

Since construction and operation of the Project will not affect designated or informal recreation areas, a detailed Part 4 analysis is not required for this resource.

As you complete the Detailed Analysis in Part 4.Q. Recreation, make sure you consider and address:

- Existing recreation uses (e.g. hunting, fishing, etc.) that could be removed or impeded
- Visual effects on recreation areas and hiking trails

R. Traffic and Transportation

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

R.1. Screening Question – Traffic and Transportation

Will the project be likely to cause any of the following, in relationship to the local and regional transportation system, during construction or operation?

- Reduce the level of service (LOS) in an area
- Restrict vehicular use
- Potential to create or increase local safety hazards
- Conflict with local, state or federal requirements related to traffic and transportation

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The construction phase of the Project could reduce the level of service in the local transportation system, particularly along Minkler Road, State Street, and East State Street, which connect Highway 9 and Highway 20 to the Project Area.

While the Project is not expected to consistently degrade road service levels, brief disruptions may occur during construction. Increased traffic for material delivery and worker transportation will be temporary. Project operations will primarily involve periodic maintenance visits and commutes of up to four operations and maintenance employees.

The Project is designed to comply with local, state, and federal traffic and transportation regulations, without imposing restrictions or safety hazards on local vehicular use. However, owing to potential truck traffic and the transport of oversize or overweight loads during construction, a comprehensive Part 4 analysis will be conducted.

The Part 4 analysis will assess potential impacts on the existing level of service on transportation routes used during construction and operations. It will also outline proposed mitigation measures for any traffic impacts.

As you complete the Detailed Analysis in Part 4.R. Traffic and Transportation, make sure you consider and address:

- Existing/potential safety hazards
- Traffic delays or road closures during construction
- Trip generation and affected intersections

Other relevant factors addressed in:

- WAC 463-60-372

S. Public Services and Facilities

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

S.1. Screening Question – Public Services and Facilities

Will the project be likely to directly or indirectly increase use of public services and facilities such as fire protection, law enforcement, schools, parks and recreation, public open space, social services or general government?

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project is a largely self-sufficient BESS facility and is therefore unlikely to directly or indirectly increase use of public services and facilities during construction or operation. Potential impacts to public services and facilities will be minor and will primarily occur during the construction period, which is anticipated to take approximately 14 months. During construction, a peak of up to 80 workers may be employed, with an average of 50 workers. As described in Part 2 of this ASC, the construction workforce is anticipated to be hired entirely from the local commuting area (defined as within Skagit County, and neighboring counties to the north (Whatcom County) and south (Snohomish County); a maximum of approximately one hour's driving distance from all major towns in the area to the Project). During operations, the Project will be staffed by up to four full-time, locally based personnel. At least two of the four full-time operations staff will aim to be hired from the current local community, requiring only two full-time staff to relocate to the Project Area. Considering these factors along with implementation of the mitigation measures outlined below, the Project will not significantly adversely affect the use of public services and facilities during construction or operation. However, given public concern around potential fire risks associated with BESS facilities, a Part 4 analysis will be prepared.

Fire Protection

A Part 4 analysis will be developed to further investigate the usage of local fire response services. In Part 4, the Applicant will describe and reference their Fire Prevention Plan to demonstrate measures to reduce and respond to fire risk. An Emergency Management Plan will be finalized and best management practices will be implemented for fire prevention prior to construction. The Applicant will coordinate with Skagit County Emergency Management to collaboratively develop safety measures that will be incorporated into the Project's design and construction. The Applicant will also coordinate with these entities regarding necessary equipment or training, if any are identified, that may be required to provide fire protection services to the Project. To further mitigate the need for fire protection services, the Project's facilities will incorporate multiple layers of protection to avoid system failures that may increase the risk of fire; all methods and mechanisms will be designed to the applicable requirements of the National Electric Code, National Fire Protection Association Standards, and Institute of Electrical and Electronics Engineers Standards.

Law Enforcement

The Skagit County Capital Improvement Plan for 2022-2032 states that infrastructure and maintenance needs exceed available resources for local law enforcement agencies, which results in competing priorities for limited funds (Skagit 911 2022). To avoid the need for additional law enforcement services, site access will be restricted, and Project

components will be secured by a perimeter fence. The Project will not require special services from the Skagit County Sheriff's Office. As a result, no adverse impacts to law enforcement services are anticipated because of the Project.

Schools, Parks, and Recreation

No significant adverse impacts to schools, parks, or recreational facilities are anticipated as a result of the Project. Construction of the Project will take about 14 months, during which period a peak of up to 80 workers will be employed. Because the construction period is temporary, little to no adverse impact on housing or schools is anticipated. Temporary, occasional use of parks and recreational facilities associated with the temporary construction population influx would not significantly adversely affect these facilities. During operations, the Project will employ up to four personnel, with at least two expected to be hired from the local population, which will not create an additional burden on schools, parks, or recreational facilities.

Public Open Space, Social Services, and General Government

The Project is on private property and primarily consists of undeveloped pasture fields, with a small section of scrub/shrub habitat near the southeastern tip. The Project's construction and operation will not have any impact on public open space. The Socioeconomic Impact Analysis (Attachment I) outlines the employment opportunities created for community members due to this Project. Additionally, increased property tax revenue generated by the Project will support social services and general government operations.

Public services and facilities will not be adversely affected, and no additional mitigation measures are expected beyond what has been described. However, due to fire risks associated with BESS facilities, a Part 4 analysis will be conducted.

References:

Skagit 911. 2022. Capital Improvement Plan 2022-2032. Version 7. May 25. Available online at:
https://www.skagit911.us/uploads/Funding%20Requirements/Capital%20Improvement%20Plan%202022-2032%20Draft%20v7.pdf

As you complete the Detailed Analysis in Part 4.S. Public Services and Facilities, make sure you consider and address:

- Existing/potential inadequacy of service providers to meet need.
- Consumption of disproportionate share of existing or future service capacities.
- Options to reduce service demand (onsite security, etc.).

T. Utilities

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

T.1. Screening Question – Utilities

Will the project be likely to increase demand for public or privately owned water, sewer, storm water, solid waste, communication, or energy utilities?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

The Project is not expected to materially affect utilities as it will not significantly increase demand for water, sewer, stormwater, solid waste, communication, or energy services, either publicly or privately owned.

During construction and operations, water will be sourced from the Skagit PUD. Up to 730,000 gallons of water will be needed during construction. Water will solely be necessary in case of emergency fire situations during operations. In order to supply a sufficient volume of water for fire suppression, the Applicant will work with Skagit PUD to upgrade the existing water line (see Section 2.A.2 of this ASC). However, actual water demand during operations will be minimal. The average annual system water demand for Skagit PUD during the period 2011-2019 was 2,980 million gallons (Skagit PUD 2022). The construction demand, which will be spread out over a 14-month construction period, will amount to 0.02 percent of the average annual system demand and will not be a significant additional demand on the water supply.

Portable toilets will be used during the 14-month construction period, generating an estimated average of 200 to 250 gallons of waste per week. No on-site toilet facilities will be maintained during operations. Several wastewater treatment plants in the vicinity could accept waste from portable toilets. The City of Sedro-Woolley has a wastewater treatment plant with a design average flow load of up to 2.07 million gallons per day (Ecology 2018), while the City of Mount Vernon's Wastewater Treatment Plant processes between 3.5 million gallons of waste per day during dry weather and 10 million gallons of waste per day in wet weather (City of Mount Vernon n.d.). As a result, demand for sewage facilities will not be increased by construction or operation of the facility.

Stormwater management plans will be developed in consultation with the Washington State Department of Ecology and Skagit County requirements. In compliance with Washington Administrative Code (WAC) 173-200 and WAC 463-76, the Applicant will obtain a Construction Stormwater General Permit (CSWGP). The CSWGP requires a Stormwater Pollution Prevention Plan (SWPPP), including monitoring expectations, which will be developed prior to the start of construction. The Project will be designed to avoid increasing stormwater flow off of the site (see Parts 4.E and 4.G of this ASC).

Routine solid waste would be produced during construction and operation of the Project, including packaging materials and domestic refuse. Equipment and materials will be salvaged or recycled to the extent feasible and in coordination with licensed subcontractors, local waste haulers, and/or other facilities that recycle construction/demolition waste; the remaining materials will be disposed of by the contractor at authorized sites, in accordance with applicable laws. Reuse or recycling of materials will be prioritized over disposal. Batteries will most likely be shipped to recycling facilities. All solid waste requiring special disposal (e.g., transformers) will be handled according to regulations

that are in effect at the time of disposal. Solid waste will be minimal and handled internally, therefore not significantly impacting public or privately owned local solid waste utilities.

Given the Project's minimal impact on utilities, a detailed analysis of potential impacts under Part 4 is unnecessary, and no mitigation measures are proposed.

References:

City of Mount Vernon. n.d. "Wastewater Treatment Plant." Available online at: https://www.mountvernonwa.gov/443/Wastewater-Treatment-Plant (accessed March 2024).

Ecology (Washington Department of Ecology). 2018. National Pollutant Discharge Elimination System Waste Discharge Permit No. WA0023752 for the City of Sedro-Woolley. Issued December 21, 2018; effective January 1, 2019. Available online at: https://cms5.revize.com/revize/cityofsedrowoolley/Departments/Wastewater/2019_2023_NPDES_Waste_Discharge_Permit_No_WA0023752.pdf

Skagit PUD (Public Utility District). 2022. 2021 Water System Plan Limited Update. Mount Vernon, WA. May. Available online at: https://www.skagitpud.org/home/showpublisheddocument/2722/638435948696030000

As you complete the Detailed Analysis in Part 4.T. Utilities, make sure you consider and address:

- Existing/potential inadequacy of utilities to meet need.
- Consumption of disproportionate share of existing or future utility capacities.
- Potential to reduce service demand (conservation, etc.).
- Identify where utilities have confirmed service availability.

U. Archaeological and Historical Resources

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

U.1. Screening Question – Archaeological and Historical Resources

Will the project occur in an area or location that includes the following? Note that to answer these questions with a definite "yes" or "no" requires a Desktop Survey, which must be conducted by a consultant.

- Archaeological Site or Built Environment Property over 50 years in agricultural resource site
- Any known landmarks or evidence of historic, archaeological, scientific, or cultural importance
- Is listed or is eligible to be listed on a local, state, or federal historic register

☐ No	Explain below why you believe "No" is the appropriate answer.
☒ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

A review of the DAHP Washington Information System for Architectural and Archaeological Records Data (WISAARD) database on the cultural resources did not identify recorded resources within the Area of Potential Impacts (API). A total of 11 prior cultural resources surveys have been previously conducted within 1 mile of the API, and 3 of these surveys identified archaeological resources within 1 mile of the API. Eleven built environment historic resources have also been previously recorded within approximately 1 mil3 of the API.

In February 2023, a pedestrian surface survey and subsurface investigation was performed on the primary site portion of the API, excluding the transmission line corridor and access areas. No archaeological resources were identified. Five historical resources were identified. However, based on the field survey, archival research, and historic resource evaluation, none of the five historic era resources on the property are recommended eligible for the NRHP.

In March and April of 2024, a pedestrian surface survey and subsurface investigation was performed on the remainder of the API, consisting of the transmission line corridor and access areas. This survey identified one historic site.

Because the Project will occur in an area that includes historic resources that are over 50 years old, a Part 4 detailed analysis will be prepared for this resource. The Applicant intends to avoid disturbing all known and identified archaeological and historical resources. If a resource is unavoidable, however, the applicant will obtain the necessary permits prior to any disturbance. In addition, An Inadvertent Discovery Plan will be developed and submitted prior to construction and will set procedures in the event an unidentified archeological or historical resource is encountered during project construction or operations.

The included Part 4 analysis, along with the report "Cultural Resources Inventory for the Goldeneye Energy Storage Project, Skagit County, Washington" (Attachment E), discloses potential Project impacts to archaeological and historical resources, as well as all recommended archaeological mitigation measures.

As you complete the Detailed Analysis in Part 4.U. Archaeological and Historical Resources, make sure you consider and address:

- Effects on access to the site or to the resource.
- Methods to protect/preserve cultural and historic resources.
- Enhancement measures (improved public or tribal access, matching the character of the site, etc.).
- Include description of the cultural/historic resource and how it was identified.

Other relevant factors addressed in:

- WAC 463-60-362

V. Cultural Resources

Summary Indicate yes or no in the fields beside each of the following questions. Grayed fields are for the use of EFSEC staff only.

Question	Applicant Response				EFSEC Staff Response			
1. Does screening trigger a Part 4 analysis?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
2. Is it clear what analysis or study is called for?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
3. Is the analysis sufficiently complete for SEPA determination?	☐ No	☒ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
4. Is the analysis fully complete for application review?	☒ No	☐ Yes	☐ Maybe	☐ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A
5. Are the proposed commitments (if any) adequate?	☐ No	☐ Yes	☐ Maybe	☒ N/A	☐ No	☐ Yes	☐ Maybe	☐ N/A

V.1. Screening Question – Cultural Resources

Will the project occur in an area or location that includes…

- existing tribal hunting or fishing rights?
- existing tribal plant gathering?
- tribal cultural sites?
- usual and accustomed areas?
- material culture artifacts?
- activities on the site that could impede views of traditional cultural sites?

☒ No	Explain below why you believe "No" is the appropriate answer.
☐ Yes	Explain below what aspect of the question triggered a "Yes" response; **and** complete Part 4 - Detailed Analysis
☐ Maybe	Explain below how you will obtain the information needed for a definitive "Yes" or "No" prior to the final submission of your application.

In February 2024, based on a review of DAHP's interactive map of tribal areas of interest, the following Tribes were identified as having a potential interest in the Project Area: the Confederated Tribes of the Colville Reservation, the Lummi Nation, the Sauk-Suiattle (Indian) Tribe, the Snoqualmie Indian Tribe, the Stillaguamish Tribe of Indians, Swinomish Indian Tribal Community, Tulalip Tribes (of Washington, Upper Skagit (Indian) Tribe and the Samish Indian Nation. An outreach letter was sent to each of these Tribes to describe the location and nature of the undertaking and to request information on any potential concerns about the Project or known tribal resources, traditional cultural properties, and/or traditional uses of the landform in the vicinity of the project. The Lummi Nation Tribal Preservation office responded that they believed the Washington DAHP and Tribes closer to the Project site should be consulted. Additionally, the Confederated Tribes of the Colville Reservation responded to the outreach letter and noted that the area is not in their traditional territory, and they had no comment on the Project as proposed. None of the other contacted Tribes had responded to the outreach letter. None of the contacted Tribes has yet provided information concerning existing tribal plant gathering, tribal hunting rights, or tribal fishing rights in the vicinity. A Part 4 detailed analysis is not recommended based on this review. This conclusion is made in the absence of information from several Tribes in the area. Further outreach to Tribes is expected during the EFSEC process. The Applicant will be available to discuss any information as a result of the formal consultation process.

As you complete the Detailed Analysis in Part 4.V. Cultural Resources, make sure you consider and address:

- Whether you have contacted or talked to any tribal representatives.
- Whether you have checked any tribal websites.
- Visual effects on known Traditional Cultural Properties.

Part 4 – Detailed Analysis

Environment Element Number and Name	4.A. Earth

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Geotechnical Engineering Report, 2580 Minkler Road, in Sedro-Woolley, Skagit County, Washington (Attachment G)	June 28, 2023	Terra-Geo, Inc., consultant to the Applicant	☐ No	☒ Yes
Preliminary Percolation Evaluation for the Goldeneye Site, Sedro-Woolley, Washington (Attachment G)	January 6, 2023	Terra-Geo, Inc., consultant to the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
General Description of Site	The Project Area features gentle slopes with elevations ranging from approximately 45 to 60 feet. The underground gen-tie line crosses Hansen Creek to connect the Project to the Sedro-Woolley Substation, causing a drop in elevation of about 10 feet along the creek bed. In order to understand the geology present within the site pre-construction area, the Applicant has prepared a Geotechnical Engineering Report (see Attachment G) that describes the geology, soils, topography, and existing erosion patterns of the Project Area. The Geotechnical Engineering Report also provides information regarding geologic hazards that may affect the Project, including seismic hazards (e.g., ground shaking, surface fault rupture, soil liquefaction, and other secondary earthquake-related hazards), slope instability, flooding, ground subsidence, collapsible soils, corrosive soils, and erosion, as well as descriptors of the soil types and their compaction. The Project Area lies in the broad alluvial valley of the Skagit River. The surficial geology consists of Holocene alluvial sediments that have been filling the valley since the retreat of Vashon Stade glaciers

	from the area. The alluvial sediments consist of interbedded channel, overbank, and quiet-water deposits. Channel deposits consist primarily of sand and gravel that were deposited in a relatively high-energy environment, typically on the bed or point bar of a channel of the Skagit River. Overbank deposits consist of silt and silty fine sand that were deposited during floods of the Skagit River. Quiet-water deposits primarily consist of silt, clay, and fine sand that were deposited in low-energy environments, such as lakes, marshes, estuary type environments, oxbow lakes, or small side channels associated with the Skagit River. The Project Area is underlain by older alluvium and lahar run-out deposits of the Skagit River valley (Holocene), an iron-stained sand, silt, and clay. Minor volcaniclastic sands and gravels of probable Glacier Peak Origin form terraces 15 to 50 feet above the modern floodplain. The USDA Natural Resources Conservation Service for Skagit County, Washington, identifies the site as containing Field Silt Loam, Minkler Silt Loam, and Sumas Silt Loam soils (Soil Survey Staff 2024). Silts, gravels, and sands, all varying in silt content, were identified sitewide, exhibiting variability in composition, depth, and density (Attachment G). No evidence of surficial erosion has been found within the Project Area (Attachment G); however, Minkler Silt Loam soils have a relatively high wind erodibility rating. The Project Area is located in Skagit County, Washington, where regulated geologically hazardous areas could include erosion, landslide, earthquake, or other geological hazards. Geologically Critical Areas are defined in Skagit County's critical areas code, specifically Skagit County Code (SCC) 14.24.400-430. **References:** Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. 2024. Web Soil Survey. Available online at: http://websoilsurvey.sc.egov.usda.gov/ (accessed February and May 2024).
Geologic Hazards	**Erosion:** The Project Area is not at risk for erosion hazards as none of the criteria listed within SCC 14.24.410(1) are applicable (including slopes greater than 30 percent, containing coastal beaches or bluffs, special areas identified by varying governing bodies, not susceptible to rapid stream incision and bank erosion, etc.). The Project Area's slopes are less than 30 percent and the site's identified soils are generally not erosion-prone according to the Geotechnical Engineering Report, Natural Resources Conservation Service soils data, and observations made during several site visits (Attachment G; Soil Survey Staff 2024). However, Minkler Silt Loam soils make up 3.1 acres of the Project Area and have a relatively high wind erosion potential and the Sumas Silt Loam soils are not rated. The site's soils will be susceptible to erosion when exposed during construction. Proper implementation and maintenance of BMPs for erosion prevention and sedimentation control will adequately mitigate the erosion potential in the planned development area (Attachment G, Section 5.1.2). Erosion protection measures as required by Skagit County will also be in place prior to and during grading activity on the site. **Landslide Hazard:** The Project Area does not contain any of the criteria listed in SCC 14.24.410 (2) for landslide hazard areas (Attachment G). These criteria include slopes greater than 15 percent that meet identified criteria, areas of previous failure, potentially unstable areas resulting from rapid stream incision,

	coastal bluffs, and other specific considerations identified in SCC 14.24.410(2) as listed in Attachment G. Accordingly, the site does not fall within a Landslide Hazard Area. **Seismic Hazard:** The Project Area is not within ¼ mile of an active fault and is not at risk of tsunami or seiche hazards. However, the site is identified as moderately to highly susceptible to liquefaction due to seismic activity based on Skagit County's Liquefaction Susceptibility Map (Attachment G). To address this, seismic design will adhere to procedures outlined in the 2018 IBC. According to the IBC, structures on Site Class E sites, as per ASCE 7-16, must be designed to withstand earthquake motions (Attachment G). Anticipated liquefaction settlements within the Project Area are expected to be within acceptable limits (up to 4 inches). As a result, ground improvement techniques specific for liquefaction mitigation are not anticipated to be necessary for site development (Attachment G). **Volcanic Hazard:** The volcanic hazard risk at this site is considered negligible (Attachment G). As defined in SCC 14.24.410 (4), a site assessment is not required for volcanic hazard areas unless other specific criteria apply. **Mine Hazard:** The DNR's Inactive and Abandoned Mines map identifies mines. A project is deemed in a mine hazard area if it falls within 200 feet of any current or historic mine operations flagged as geologically hazardous by the Administrative Official. However, the risk of mine hazards for the Project Area is minimal as there are no such features within 200 feet. Additionally, there are no listed inactive or abandoned mines in greater Skagit County, according to DNR (2024). **References:** DNR (Washington State Department of Natural Resources). 2024. Geologic Hazard Maps. Available online at: https://www.dnr.wa.gov/programs-and-services/geology/geologic-hazards/geologic-hazard-maps (accessed February 2024). Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. 2024. Web Soil Survey. Available online at: http://websoilsurvey.sc.egov.usda.gov/ (accessed February and May 2024).
Unique physical features	Unique physical features were not identified within the Project Area.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Geohazards	The potential for surface fault rupture within the Project Area is considered low due to the relative distance of the confirmed fault zones and lack of large earthquake events mapped near the Project Area (Attachment G). The Project will provide seismic design using 2018 IBC. Site Class E will be used for sandy and silty soils. In accordance with ASCE 7-16 Section 11.4.8, a ground motion hazard analysis is required for sites classified as Site Class E and because the spectral response acceleration at 1-second periods (S1) is greater than or equal to 0.2. However, an exception is allowed, provided specific requirements are satisfied, related to the fundamental period of the considered structure. Table 1 in Attachment G provides recommended seismic design parameters for Site Class E. These values are only valid if the exceptions provided in ASCE 7-16 Sections 11.4.8 and 20.3.1 described apply to the structures. The Applicant will design and construct the Project according to the allowable exceptions including the mitigation and geotechnical design methods described in Section D. The site is identified as moderately to highly susceptible to liquefaction due to seismic activity based on Skagit County's Liquefaction Susceptibility Map (Attachment G). To address this, seismic design will adhere to procedures outlined in the 2018 IBC. According to the IBC, structures on Site Class E sites, as per ASCE 7-16, must be designed to withstand earthquake motions (Attachment G). Anticipated liquefaction settlements within the Project Area are expected to be within acceptable limits (up to 4 inches). As a result, ground improvement techniques for liquefaction mitigation are not anticipated to be necessary for site development. However, Section D outlines mitigation that would minimize liquefaction risks including soil stripping, fill placement, compaction, and foundation pile specifications. Landslides and steep slopes are not a hazard within the Project Area. Access roads will be required during construction to accommodate construction equipment and deliveries. The access roads will also facilitate long-term operation and maintenance of the Project. These roads will be subjected to heavy loads, but only for limited duration and frequency. The surficial materials encountered within a majority of the preliminary geotechnical testing locations indicated native soils consisting of clay soils with varying amounts of sand and silt. These materials are generally considered to be poor in terms of supporting vehicular and construction traffic as defined by AASHTO when used for support of pavement structures. Access roads for the Project will be either asphalt pavement or gravel roads. The final access roadway section thickness and required material thickness recommendation will be provided during final Project design and engineering. Access roads will be constructed with an aggregate surface to help ensure accessibility during wet conditions. As described above in Section B and in Section D below, the Project will include design methods, mitigation, and avoidance (if possible) for geological hazards (e.g., seismic hazards, erosive soils,

	collapsible soils, high risk flood areas, etc.). As a result, the Project is in compliance with the County's Critical Area Ordinance in regard to geological hazards.
Water Flow	New impervious surfaces will be developed as part of this Project (e.g., gravel roads, rooftops, parking, and a pond). However, stormwater will generally infiltrate across the site by infiltrating through vegetation or, where necessary, through permanent detention basins with outlet culverts to allow water to slowly release and infiltrate. Overall, impervious surfaces are anticipated to be 10 acres. Scour will be minimized and avoided through Project design and BMPs including a proposed stormwater detention pond (see Attachment B, Proposed Drainage Plan Sheet C2-4).
Topography	The Project will require clearing, stripping, fill, and compaction to mitigate sandy and silty soils (Attachment G, Section 5). The Applicant will provide grading plans and specify the source of fill in the Construction Plans and Specifications that will be provided to EFSEC for approval prior to site preparation. The Applicant will obtain Building Permits from Skagit County if needed. Per RCW 17.10.140, the Applicant will prepare and submit a Vegetation and Weed Management Plan to EFSEC for the control of noxious and problem weeds prior to construction.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☐ No	☒ Yes

Topical area/issue	Changes
Liquefaction hazard	The site is identified as moderately to highly susceptible to liquefaction due to seismic activity based on Skagit County's Liquefaction Susceptibility Map (Attachment G). To address this, seismic design will adhere to procedures outlined in the 2018 IBC. According to the IBC, structures on Site Class E sites, as per ASCE 7-16, must be designed to withstand earthquake motions (Attachment G). Anticipated liquefaction settlements within the Project Area are expected to be within acceptable limits (up to 4 inches). As a result, ground improvement techniques specific for liquefaction mitigation are not anticipated to be necessary for site development (Attachment G). However, foundation design will address and mitigate liquefaction hazard as discussed in the following section.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Implementation of Geotechnical Recommendations	The Applicant will follow all geotechnical recommendations provided in the Geotechnical Engineering Report. Recommendations included in Section 5.0 of the Geotechnical Engineering Report (Attachment G) including the following. **Ground Surface and Subgrade Preparation.** Clearing and stripping depths across the site are anticipated to be from 12 to 18 inches, and approximately 5 feet of fill is anticipated. On-site silty and sandy soils are not suitable for structural fill due to moisture conditions and compaction limitations (Attachment G).	EFSEC

	Stripping, fill, and compaction will be conducted to address silty and sandy soils and provide stability for shallow foundations. Subgrades across the site must be thoroughly compacted to a uniformly firm and unyielding condition before placing structural fill. If soft or otherwise unsuitable subgrade areas are revealed during evaluation that cannot be compacted to a stable or uniformly firm condition, the unsuitable soils will be scarified, aerated, and recompacted, if practical; or the unsuitable soils will be removed and replaced with compacted structural fill. The subgrade preparation and compaction recommendations in Sections 5.1 and 5.2 of the Geotechnical Engineering Report (Attachment G) will be followed to mitigate the risks associated with shallow foundations and seismic hazards. **Fill and Compaction.** The workability of material for use as structural fill will depend on the gradation and moisture content of the soil. It is recommended that washed crushed rock or select granular fill, as described below, be used for structural fill during wet weather. If prolonged dry weather prevails during the earthwork phase of construction, materials with a somewhat higher fines content may be acceptable. Weather and site conditions will be considered when determining the type of import fill materials purchased and brought to the site for use as structural fill. Material used for structural fill will be free of debris, organic contaminants, and rock fragments larger than 6 inches. For most applications, it is recommended that structural fill consist of material similar to "Select Borrow" or "Gravel Borrow" as described in Section 9-03.14 of the WSDOT Standard Specifications. To obtain proper compaction, fill soil will be compacted near optimum moisture content and in uniform horizontal lifts. The maximum allowable moisture content varies with the soil gradation and should be evaluated during construction. During fill and backfill placement, sufficient testing of in-place density will be conducted to check that adequate compaction is being achieved. Fill placed to raise site grades and materials under pavements and structural areas will be placed on subgrades prepared as previously recommended. Fill material placed below structures and footings will be compacted to at least 95 percent of the theoretical maximum dry density (MDD) per ASTM International (ASTM) D 1557. Fill placed deeper than 2 feet below pavement sections should be compacted to at least 92 percent of the MDD. Fill material placed in landscaping areas will be compacted to a firm condition that will support construction equipment, as necessary, typically around 85 to 90 percent of the MDD. **Seismic Hazards.** The Project seismic design will use Site Class E and the 2018 IBC as well as ASCE 7-16 including the seismic design parameters listed in Table 1 of	

	Attachment G. These parameters are consistent with the Washington State Building Codes. The Project will comply with the current codes at the time of construction, demonstrating compliance with WAC 463-62-020. Deep foundations may be required for several structures as discussed in the groundwater paragraph below. In order to address liquefaction hazards, it is anticipated that augercast piles (for foundations) will be embedded below the liquefaction zones and into gravels between 35 and 40 feet below existing ground surface to account for potential downdrag forces. A qualified geotechnical engineer will observe the drilling operations, monitor grout placement and volumes, and evaluate the adequacy of individual drilled shaft installations. Specific recommendations for augercast piles are provided in Attachment G. Attachment G also includes other options for case in-place foundation piles to address liquefaction hazard. The final Project design will address foundation design to meet liquefaction hazards. **Groundwater.** Groundwater was observed from 5 to 10 feet below ground surface (Preliminary Percolation Evaluation, Attachment G). Groundwater extraction would not be required for Project slab foundations or excavations. In addition, fill will be placed to bring elevations up out of floodplain levels in associated Project infrastructure areas. Limited groundwater extraction would be required for directional drilling for the gen-tie conduit under Hansen Creek; and for deep foundations. Anticipated deep foundations include: 1) lightning protection masts, 2) overhead/underground conversion structure, 3) the control building could either be placed on a shallow foundation or concrete drilled piers, and 4) the soundwall - concrete drilled piers. The CSWGP would include specific requirements for handling extracted groundwater. It is noted that this potential groundwater extraction would be minimal and could be contained and hauled off-site to a public wastewater treatment facility. Deep foundations would be constructed to meet requirements for liquefaction hazard. **Erosion.** The Applicant will implement an Erosion and Sediment Control Plan (ESCP), a Construction Phase SWPPP, and an Operations Phase SWPPP, in compliance with local stormwater regulations. These plans will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The ESCP will include BMPs such as the appropriate use of silt fencing to avoid or eliminate runoff of contaminants. The SWPPPs will include BMPs from the Washington Department of Ecology's 2019 Stormwater Management Manual for Western Washington (SWMMWW) as well as relevant sections of Skagit County Code. Implementation of an ESCP will incorporate scheduling grading and construction to reduce exposure, re-vegetating or mulching denuded areas, directing runoff away from exposed soils,	

	decreasing runoff velocities, confining sediment to the Project site, and inspecting and maintain control measures frequently. In addition, per RCW 17.10.140, the Applicant will prepare and submit a Vegetation and Weed Management Plan to EFSEC for the control of noxious and problem weeds prior to construction. The plan will be implemented to revegetate temporarily impacted areas and minimize erosion. **Retaining Walls.** Retaining walls may be used for grade transitions at the perimeter of the structural fill pad area. The walls are estimated to range from 4 to 6 feet in maximum height. General design parameters for mechanically stabilized earth (MSE) retaining walls are that the design calculations conform to WSDOT Specification Section 6-13.3(2). MSE walls should be assumed to have minimum grid lengths of 4 feet if no taller than 6 feet. The wall subgrade soils will generally consist of native soils suitable for support of these types of walls, provided they are compacted in place and inspected by geotechnical personnel before founding the MSE walls. Provided the proposed structures at the site can withstand the anticipated liquefaction settlement, they may be satisfactorily supported on continuous wall and isolated column footings founded in the structural fill planned for the site. Exterior footings should be established at least 18 inches below the lowest adjacent grade. Interior footings can be founded a minimum of 12 inches below the top of the floor slab. Isolated column and continuous wall footings should have minimum widths of 24 and 18 inches, respectively. **Foundations.** Based on the groundwater conditions in the site explorations and our understanding of the proposed footing elevations (bottom of footings established at or within a few feet of an approximately 5-foot increase in site grade), footing drains are not necessary to maintain bearing support as provided in the Geotechnical Engineering Report (Attachment G). However, because of the potential for near-surface seepage during wetter times of the year and from irrigation and potential landscaping, footing drains should be considered to maintain drier conditions around the structure and to reduce groundwater seepage that could migrate below the building slab. Deep foundations were previously discussed in the seismic hazards and the groundwater paragraphs above. **Roads.** Section 6.0 of the Geotechnical Engineering Report provided in Attachment G provides recommendations for pavement design.	

	Building Permits. The Applicant will provide grading plans and obtain necessary building permits from Skagit County Planning and Development Services if needed.	

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
NA	NA

Environment Element Number and Name	4.B. Air Quality

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
No studies related to air quality have been conducted for the Project nor are any studies planned.			☒ No	☐ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Regulatory	The Clean Air Act (CAA) is the primary federal statute governing air quality. The EPA has promulgated primary and secondary National Ambient Air Quality Standards (NAAQS) for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), two size categories of particulate matter (particulate matter less than 10 and less than 2.5 microns in diameter [PM_{10} and $PM_{2.5}$]), ozone, sulfur dioxide (SO_2), and lead. The primary standards are concentration levels of pollutants in ambient air, averaged over a specific time interval, designed to protect public health with an adequate margin of safety. The secondary standards are concentration levels judged necessary to protect public welfare and other resources from known or anticipated adverse effects of air pollution. Although states may promulgate more stringent ambient standards, the State of Washington has adopted standards identical to the federal levels (see WAC 173-476, Ambient Air Quality Standards). Local air quality is measured against these national and state standards, and areas that do not meet the standards are designated as "non-attainment" areas. A new emissions source must demonstrate compliance with all applicable federal and state air quality requirements, including emissions standards and ambient air quality standards. The State of Washington has established rules through Ecology for permitting new sources in both attainment and non-attainment areas of the state, and additional requirements may be imposed by local air authorities. WAC 463-62-070 requires that energy facilities meet all federal and state air quality laws and regulations mentioned above, and WAC 463-78 establishes adoption of these requirements by EFSEC. EFSEC issues authorizations for air emissions for sources under its jurisdiction. In general, if potential emissions from stationary sources exceed certain thresholds, approval from the applicable permitting authority is required before beginning construction. In an effort to bring the area back into compliance with air quality standards, new sources of

air emissions in non-attainment areas must undergo more rigorous permitting than equivalently sized sources in attainment areas. However, the Project is not located within a non-attainment area for any criteria pollutants (EPA 2024a).

Under the CAA, new industrial sources of air pollution must receive an air quality permit prior to operation. The two most common permits associated with industrial activity emitting regulated air pollutants are Notice of Construction/New Source Review approvals and Prevention of Significant Deterioration (PSD) permits. WAC 463-39 and 173-400 establish the requirements for review and issuance of notice of construction approvals for new sources of air emissions.

A Notice of Construction is not required for the Project because there would be no permanent source of regulated air emissions. PSD regulations apply to proposed new or modified sources located in an attainment area that have the potential to emit criteria pollutants in excess of predetermined *de minimis* values (40 CFR Part 51). For new generation facilities, these values are 100 tons per year of criteria pollutants for 28 specific source categories, or 250 tons per year for sources not included in the 28 categories. A PSD permit would not be required for the Project because operation of a BESS does not produce air emissions.

A concrete batch plant will not be required during construction or operation of the Project, and as such, no associated permit will be required. During operations, the Project substation and optional O&M building will be connected to the local utility (i.e., PSE). No back-up power generators are proposed and therefore no associated permits will be required.

Construction Emissions:
Although construction emissions are not included in the permitting of stationary sources, mobile sources (such as construction equipment and maintenance pickups) are regulated separately under the CAA. Washington State regulates what are known as “fugitive” air emissions, which consist of pollutants that are not emitted through a chimney, smokestack, or similar facility. Blowing dust from construction sites, unpaved roads, and tilled agricultural fields are common sources of fugitive air emissions. Battery storage facilities are not included among the facilities for which review and permitting of fugitive emissions are required (WAC 173-400-040). Nevertheless, WAC 173-400-040(9)(a) requires owners and operators of fugitive dust sources to take reasonable measures to prevent dust from becoming airborne and to minimize emissions.

Other Washington State regulations that apply to nuisance emissions, including fugitive dust, and various equipment used during construction include the following:

- WAC 173-400-040(3) Fallout. No person shall cause or allow the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.
- WAC 173-400-040(4-4a) Fugitive emissions. The owner or operator of any emissions unit engaging in materials handling, construction, demolition, or other operation, which is a source of

	fugitive emissions, if located in an attainment area and not impacting any non-attainment area, shall take reasonable precautions to prevent the release of air contaminants from the operation. • WAC 173-400-040(5) Odors. Any person who shall cause or allow the generation of any odor from any source that may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice and procedures to reduce these odors to a reasonable minimum. • WAC 173-400-040(9) Fugitive dust. The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions. **Greenhouse Gases:** Greenhouse gases (GHG) play a critical role in determining the earth's surface temperature. A GHG is any gas in the atmosphere that absorbs infrared radiation. The infrared radiation is selectively absorbed or "trapped" by GHGs as heat and then reradiated back toward the earth's surface, warming the lower atmosphere and the earth's surface. As the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere gradually increases, thereby increasing the potential for indirect effects such as a decrease in precipitation as snow, a rise in sea level, and changes to plant and animal species and habitat. Climate impacts are not attributable to any single action but are exacerbated by diverse individual sources of emissions that each make relatively small additions to GHG concentrations. GHGs are emitted by both natural processes and human activities. Human activities known to emit GHGs include industrial manufacturing, utilities, transportation, residential, and agricultural activities. The GHGs that enter the atmosphere because of human activities are CO_2, methane, nitrous oxide, and fluorinated carbons (i.e., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride). In Washington state, GHGs are regulated by RCW Chapter 70A.45, which establishes goals for statewide reduction of GHG emissions. The statute aims to reduce overall GHG emissions to 45 percent below 1990 levels by 2030. By 2050, the state intends to reduce overall emissions to 95 percent below 1990 level. Goals also included fostering a clean energy economy by increasing the number of jobs in the clean energy sector to 25,000 by 2020, from just over 8,000 jobs in 2004 (RCW 43.330.310). WAC 173-441 established an inventory of GHG emissions through a mandatory GHG reporting rule for certain operations. Because battery storage would not emit GHGs during operations, these regulations would not apply to the Project. In addition, the Project will assist the State of Washington in meeting its goal of greenhouse gas emission-free electricity supply by 2045 by reducing the need to build new emitting energy facilities to meet peak demand.
Climate	The Project will be located off Minkler Road, outside the eastern edge of Sedro-Woolley, within the Skagit Valley, and less than 1 mile north of the Skagit River. It will encompass approximately 16 acres in a primarily undeveloped area which includes rural lands and pasture fields. In this region of Washington, the summers are cool and comparatively dry, and winters are mild, wet and cloudy. Average annual precipitation at Sedro-Woolley, Washington (nearest monitor, approximately 2 miles west of the Project) is 46.6 inches. The average seasonal snowfall at Sedro-Woolley is 8.9 inches. In winter, the temperature

	averages a high of 50.5 degrees Fahrenheit (°F) and low of 32.4 °F. In summer, the temperature averages a high of 74.9 °F and a low of 44.4 °F (WRCC 2024b). Wind conditions near the Project can be characterized by Automated Surface Observing Systems (ASOS), which serves as the nation's primary surface weather observing network. The closest ASOS station near the Project is located in Burlington/Skagit Regional Airport in Burlington, Washington. Based on data collected over the 5-year period of 2019 through 2024, the prevailing winds most frequently blew from the northwest (approximately 3.5 percent of the time), from the southeast (approximately 3.0 percent of the time), and from the northeast and southwest (each approximately 1.5 percent of the time), with calm conditions (less than 2.0 miles per hour) occurring approximately 47.3 percent of the time. The average wind speed for the period was approximately 4.1 miles per hour (IEM 2024).
Regional Air Quality	The orographic lifting of the moisture-laden southwesterly and westerly winds results in heavy precipitation in this area, which effectively improves air quality by removing $PM_{2.5}$ and other pollutants during rain events. However, occasional outdoor burns, such as wildfires, can contribute to an increase in $PM_{2.5}$. The area surrounding the Project is partially residential and partially open pasture fields, with the city of Sedro-Woolley located immediately west of the Project (WRCC 2024a). The nearest air quality monitors that can be used to determine compliance with the NAAQS are summarized in Table 4.B-1. The Air Quality Index (AQI) Summary Report is used to obtain the ambient monitoring data when available and the 2023 Washington Ambient Air Monitoring Network Plan is used to supplement any data for any pollutants that was not provided in the AQI Summary Report. Ambient monitoring data reported in this table are for years 2021 through 2023 (Ecology 2023). The nearest monitors are located in Anacortes, Skagit County (approximately 19 miles west), which measures ozone, $PM_{2.5}$, and SO_2. The nearest CO, NO_2 and PM_{10} monitors are located in Seattle, Washington (approximately 65 miles south) (EPA 2024b).

Table 4.B-1. Ambient Air Quality Monitors Nearest the Project with Comparison to NAAQS

Pollutant/ Averaging	Site	2021	2022	2023	3-year Max Design value	NAAQS	Units
CO 1-hr	Seattle – 10th & Weller (ID 530330030)	1.3	1.3	1	1.3	35	ppm
CO 8-hr		1.0	1.7	1.5	1.7	9	ppm
NO_2 1-hr	Seattle – 10th & Weller (ID 530330030)	9.3	16.4	15.2	16.4	100	ppb
NO_2 Annual		41	41	N/A	41	53	ppb
PM_{10}	Seattle – Beacon Hill S (ID 530330080)	25	17	23	25	150	ug/m^3
$PM_{2.5}$ 24-hr	Anacortes – 202 O Ave (ID 530570011)	4.8	5.6	5.3	5.6	35	ug/m^3
$PM_{2.5}$ Annual		5.5	5.6	N/A	5.6	12	ug/m^3
SO_2 1-hr	Anacortes – 202 O Ave (ID 530570011)	4.6	2.5	11.1	11.1	75	ppb
SO_2 3-hr		0.35	0.35	0.32	0.35	500	ppb
Ozone 1-hr	Anacortes – 202 O Ave (ID 530570011)	0.061	0.072	0.057	0.072	0.12	ppm
Ozone 8-hr		0.052	0.067	0.050	0.07	0.07	ppm

CO – carbon monoxide; µg/m^3 – microgram per cubic meter; NO_2 – nitrogen dioxide; PM_{10} – particular matter less than 10 microns in diameter; $PM_{2.5}$ – particulate matter 2.5 microns in diameter; ppb – part per billion; ppm – part per million

References

Ecology (Washington State Department of Ecology). 2023. 2023 Ambient Air Monitoring Plan.

EPA (U.S. Environmental Protection Agency). 2024a. Green Book, Washington Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants. https://www3.epa.gov/airquality/greenbook/anayo_wa.html. Accessed May 3, 2024.

EPA (U.S. Environmental Protection Agency). 2024b. Monitor Values Report. https://www.epa.gov/outdoor-air-quality-data/monitor-values-report. Accessed May 3, 2024.

IEM (Iowa Environmental Mesonet, Iowa State University). 2024. Burlington/MT_VE ASOS Station Windrose Plot. https://mesonet.agron.iastate.edu/sites/site.php?station=BVS&network=WA_ASOS. Accessed May 3, 2024.

WRCC (Western Regional Climate Center). 2024a. Climate of Washington. https://wrcc.dri.edu/Climate/narrative_wa.php. Accessed May 3, 2024.

WRCC (Western Regional Climate Center). 2024b. Sedro Woolley, Washington Climate Summaries. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?wa7507. Accessed May 3, 2024.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Construction	The primary sources of air pollution generated by construction of the Project would be vehicle exhaust emissions, as well as fugitive dust particles from disturbed soils that become airborne. Sources of vehicle

exhaust emissions would include heavy construction equipment operating on the site, trucks delivering construction materials and Project components to the site, and vehicles used by construction workers to access the site. Pollutant emissions from these sources would be relatively small, given the size of the construction workforce and equipment fleet, and similar to emissions from other equipment commonly used for agriculture, transportation, and general construction in Skagit County. The emissions would generally be dispersed among multiple locations in and near the Project Area at any given time rather than concentrated in a specific location, and they likely would not reach significant concentrations at off-site locations. Construction activities that could create fugitive dust include transportation of materials, clearing and grading for roads, crane pads, and other Project infrastructures.

Construction activities for the Project are scheduled to take approximately 14 months (see Part 1 of this Application). Construction emissions have been estimated using EPA's Motor Vehicle Emissions Simulator (MOVES4). These emissions are associated with exhaust from heavy equipment, worker vehicle commutes, delivery and haul trucks, as well as fugitive dust from earth-moving and material handling activities. Construction scheduling and equipment have not been finalized, and therefore, reasonable, and conservative assumptions have been made for the purpose of estimating construction emissions. Actual equipment selection will be based on schedule, rental equipment availability and subcontractor inventory. A summary of total estimated emissions from construction of the Project is shown in Table 4.B-2. When compared to the most recent published emissions inventory (2020) for Skagit County, Project emissions would represent a very minor fraction of total emissions for the county (Ecology 2020). Given the relatively low magnitude, localized extent, and temporary duration of construction-related emissions, air quality impacts associated with Project construction would not be substantial.

The following assumptions were used to develop the calculations presented in Table 4.B-2:

- Construction equipment emissions including nonroad and onroad vehicle exhaust emissions were based on estimated construction activity schedule, types of vehicles/equipment, number of vehicles/equipment, fuel type, equipment load factors, and equipment size (horsepower). Equipment operating times for the equipment were based on a 5-day work week and an 8-hour workday.
- Fugitive emissions from vehicles traveling over unpaved roads include resuspended loose materials from the road surfaces. AP-42, Compilation of Air Pollutant Emission Sources, Section 13.2.2 was used to estimate emissions of particulate matter from resuspended material.
- Fugitive emissions from construction activities include particulate emissions from building and road construction such as land clearing, drilling and blasting, ground excavation, and cut and fill operations. Emission factors and equations from the "Estimating Particulate Matter Emissions from Construction Operations Final Report" (EPA 1999) published by the National Service Center for Environmental Publications (NSCEP) were used to estimate emissions of particulate emissions from construction activity operation.
- Fugitive emissions from material handling include outdoor storage piles of minerals stacked in aggregate form that are usually left uncovered. Particulate emissions arise from material loading on to the pile, wind, and loadout from the pile. AP-42, Compilation of Air Pollutant Emission

Sources, Section 13.2.4 provides a range of values for aerodynamic particle size multiplier, silt content, moisture content, and wind speed used to calculate the particulate emissions from storage piles.

Table 4.B-2. Summary of Total Estimated Construction Emissions (tons per year)

Source	VOC	NOx	CO	PM_{10}	$PM_{2.5}$	SO_2
Nonroad Vehicle Exhaust	1.014	8.639	4.248	0.740	0.718	0.014
Onroad Vehicle Exhaust	0.039	0.132	3.475	0.003	0.003	0.002
Fugitive Emissions from Unpaved Roads				16.110	1.611	
Fugitive Emissions from Construction Activities				19.792	2.997	
Fugitive Emissions from Material Handling				0.412	0.062	
Project Construction Annual (Max.) Total	**1.052**	**8.771**	**7.723**	**37.057**	**5.391**	**0.016**
Skagit County 2020 Total Emissions[1/]	**10,970**	**7,327**	**20,277**	**3,640**	**1,621**	**473**
Project Total as a Percent of Skagit County Total Emissions	***0.01%***	***0.12%***	***0.04%***	***1.02%***	***0.33%***	***< 0.01%***

1/ Ecology (2020)

CO – carbon monoxide; NOx – nitrogen oxides; PM_{10} – particular matter less than 10 microns in diameter; $PM_{2.5}$ – particulate matter 2.5 microns in diameter; SO_2 – sulfur dioxide; VOC – volatile organic compound

References:

Ecology (Washington State Department of Ecology). 2020. 2020 Washington Comprehensive Emissions Inventory Technical Support Document, data, and methods. https://apps.ecology.wa.gov/publications/documents/2002012.pdf. Accessed May 3, 2024.

EPA. (U.S. Environmental Protection Agency). 1999. Estimating Particulate Matter Emissions from Construction Operations Final Report. https://nepis.epa.gov/Exe/ZyPDF.cgi/9100KK1W.PDF?Dockey=9100KK1W.PDF. Accessed May 3, 2024.

Operation and Maintenance

O&M impacts on air quality from the Project will be minimal. Combustion emissions and fugitive dust generated by vehicles traveling on Project access roads to perform operations and maintenance functions will be the primary emissions expected during this timeframe. The volume of O&M vehicle traffic will be very low; therefore, quantities of potential emissions generated by these vehicles will be very low, intermittent, and localized. Areas disturbed during construction and not occupied by permanent Project infrastructure will be revegetated to prevent the generation of dust. Operation of the Project will not produce visible plumes, fogging, misting, icing, impairment of visibility, changes in ambient levels of pollutants, or impacts on climate.

The Project is not expected to induce regional growth that would result in substantial changes to off-site air quality. Other pollutants, including GHGs, will be emitted from outside the immediate vicinity, as a result of the total fuel cycle of the Project. These emissions will be generated from manufacturing and transporting Project parts and equipment. However, the Project itself will not directly emit GHGs beyond the use of vehicles and transportation (as mentioned above). Furthermore, the Project will support the

	state's goal of increasing use of renewable energy resources, which has been declared in part to protect Washington's clean air and water. Implementation of any weed control measures at the Project (e.g., herbicide spraying) will be conducted in compliance with federal, state, and local regulations to ensure that adverse impacts to air quality do not occur.
Odors	During Project-related construction activities, exhaust from diesel-powered vehicles and equipment as well as painting of the optional O&M building and other structures could create minor odors. These odors are not likely to be noticeable beyond the immediate vicinity and will be temporary and short-lived. Long-term odors are associated typically with industrial projects involving use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills; however, the Project involves no elements related to these types of uses. Therefore, no long-term impacts related to odors will occur with operation of the Project.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
N/A	Existing conditions at the site have been analyzed and incorporated as described above.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Implementation of BMPs and Standard Construction Practices	WAC sections addressing air quality include: • WAC 173-400-040(3) Fallout • WAC 173-400-040(4-4a) Fugitive emissions • WAC 173-400-040(5) Odors • WAC 173-400-040(9)(a) Fugitive Dust To adhere to these codes, the Applicant would implement BMPs and standard construction practices, including the following: • Vehicles and equipment used during construction would be properly maintained to minimize exhaust emissions. • Operational measures such as limiting engine idling time and shutting down equipment when not in use would be implemented. • Watering or other fugitive dust-abatement measures would be used as needed to control fugitive dust generated during construction. When applied, the Applicant will use water or a water-based environmentally safe dust palliative such as lignin for dust control. • Construction materials that could be a source of fugitive dust would be covered when stored.	N/A

	• Traffic speeds on unpaved roads would be limited to 25 miles per hour to minimize generation of fugitive dust. • Truck beds would be covered when transporting dirt or soil. • Carpooling among construction workers would be encouraged to minimize construction-related traffic and associated emissions. • Erosion-control measures would be implemented to limit deposition of silt to roadways, to minimize a vector for fugitive dust. Replanting or graveling disturbed areas would be conducted during and after construction to reduce wind-blown dust.	

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.C. Water Quality – Wetlands and Surface Waters

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Critical Areas Report, Goldeneye Energy Storage Project (Attachment J)	Completed	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Wetland and Stream Delineation Report (Attachment J)	Completed	Prepared by Skagit Wetlands & Critical Areas, LLC, environmental consultant for the Applicant	☐ No	☒ Yes
Aquatic Resources Delineation Report, Goldeneye Energy Storage Project (Attachment J)	Completed	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Wetland delineation	Approximately 1.47 acres of wetlands were identified within the Project site and gen-tie alignment. The majority of the wetlands are categorized as depressional with one wetland associated with Hansen Creek categorized as riverine. The on-site wetlands appear to have reached their present configuration after decades of heavy compaction due to livestock, following initial drainage attempts—assumed to have occurred in the late 19th or early 20th century—that included ditching and likely subsurface tile installation. Wetlands associated with the gen-tie alignment include a riverine wetland associated with Hansen Creek and a wetland enhancement area adjacent to Hansen Creek. The Critical Areas Report (CAR; Attachment J) and delineation reports for the proposed Project provide additional information and detailed mapping.
Shoreline of the State	A portion of Hansen Creek overlaps with the proposed gen-tie alignment. The property boundary for the main Project site includes a portion of the creek (0.08 acres/190 linear feet). The ordinary high-water mark for the portion of the creek within the property boundary was documented to provide a point from which

	to establish the required buffer (200 feet). The CAR (Attachment J) and delineation reports for the proposed Project provide additional information and detailed mapping.
Flood risks	Per the FEMA Flood Insurance Rate Map Community Panel Number 530151 0255 D, revised September 29, 1989, the Project site is located entirely within Zone A (areas of 100-year flood; base elevations and flood hazard factors not determined).
Regulatory	Pursuant to the Shoreline Management Act, Ecology jurisdiction includes all land within 200 feet of the ordinary high-water mark of a state shoreline and may be extended to include the entirety of an associated wetland and/or floodplain (RCEW Title 90 of Chapter 90.58; WAC 173-27). Hansen Creek is designated as a shoreline of the state and therefore the required 200-foot avoidance buffer has been applied. The proposed Project will not have any impacts to the creek nor will work occur within the buffer. The gen-tie connection will be placed underground via directional drilling, thus avoiding impacts to Hansen Creek and surrounding wetlands and buffers. As such, the Project is not expected to be subject to the Hydraulic Project Approval permit administered by the WDFW. Skagit County wetland buffers were applied to wetlands identified during the delineation. Buffer widths vary from 50 to 150 feet, depending on the Ecology wetland rating and intensity of land use impacts. Buffers were applied based on high-intensity land use in anticipation of the proposed Project. Impacts to these features will require the submittal of a Joint Aquatic Resources Permit Application (JARPA).

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Wetland and wetland buffer impacts	The proposed Project is required to provide a gen-tie line to connect the energy storage site with the Sedro-Woolley Substation located just to the south of the Project site. The gen-tie line must cross over Hansen Creek to connect to the substation. An overhead connection is not feasible given the existing utilities. Therefore, the connection will be placed underground via directional drilling. Directional drilling avoids impacts to Hansen Creek and surrounding wetlands and buffers. However, due to the position of the wetlands within the energy storage site, avoidance of these features is not feasible. Therefore, all 1.18 acres of wetlands delineated within the energy storage site will be permanently impacted (see Figure 9, Project Impacts, of the CAR [Attachment J]). The remaining wetlands, which occur off site, will not be impacted. The access road will overlap with a portion of the buffer associated with the off-site wetland. This overlapping portion of the buffer includes lands that are degraded from past fill activity, the powerline corridor, and overall maintenance activities. The road will be temporary and only used for construction purposes and if the underground gen-tie will need to be serviced. Therefore, the temporary access road and its use during construction will not result in a permanent impact to the buffer.

Existing/potential flood risks	Per the Project Flood Study, the 100-year BFE was determined to be 61.3 feet. To mitigate the potential for Project flooding, the Project site is proposed to be filled and elevated above the BFE. Specifically, all Project electrical equipment foundations have been designed to be a minimum of 1.0 foot above the BFE.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
N/A	

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Avoidance	The proposed Project will avoid impacts to Hansen Creek. The area adjacent to Hansen Creek, but outside of the 200-foot buffer, will be revegetated with native plants per the landscape plan currently being prepared for the Project. The conceptual planting plan is provided as Appendix F of the CAR (Attachment J).	N/A
Mitigation	Complete avoidance of wetlands and their associated buffer is not feasible due to the constraints of the Project site and surrounding area, particularly regarding property ownership. Due to the necessity of proximity to the Sedro-Woolley Substation, this site was the only feasible option for this Project. Therefore, all 1.18 acres of wetlands delineated within the energy storage site will be permanently impacted. No off-site wetlands will be impacted. The Applicant considered on-site compensatory mitigation for wetland impacts; however, due to the site design, there was not sufficient space available on site for mitigation that will be ecologically feasible and likely to succeed. Following guidance in the Federal Rule (33 CFR Part 332), the Applicant explored the possibility of using a mitigation bank to compensate for impacts. There are two approved mitigation banks within Skagit County that currently have credits that could mitigate for Project impacts: Skagit Valley Environmental Bank and Nookachamps Mitigation Bank. The goal of the mitigation plan is to fully compensate for all wetland impacts associated with this Project through the purchase of mitigation credits at an agency-approved mitigation bank. The Applicant will pay the mitigation bank based on the determined credit amount. The Applicant has prepared a JARPA, and the final mitigation requirements will be addressed through that process. Based on mitigation ratios identified in the Skagit Valley Environmental Bank mitigation banking instrument, the Applicant proposes to purchase 1.029 acres of credits to offset impacts to Category III and IV wetlands (see Attachment Q).	DOE
Avoidance and minimization measures	The general avoidance and minimization measures have been developed to avoid and minimize effects resulting from the proposed Project, particularly considering	DOE

	partially impacted features that are on the border of the site. Those will include, but are not limited to: • Worker Awareness Training • Construction BMPs and Monitoring • SWPPP • ESCP • SPCC Plan • Fugitive Dust Control	

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.E. Water Quality: Stormwater Runoff

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Critical Areas Report, Goldeneye Energy Storage Project (Attachment J)	June 2024	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Flood Study – Hansen Creek at Minkler Road (Attachment K)	April 2024	Prepared by Power Engineers, consultant for the Applicant	☐ No	☒ Yes
Geotechnical Engineering Report (Attachment G)	June 2023	Prepared by Terra-Geo, Inc., consultant for the Applicant	☐ No	☒ Yes
Wetland and Stream Delineation Report (Attachment J)	May 2023	Prepared by Skagit Wetlands & Critical Areas, LLC, consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
General	Descriptions of the Project Area, the Project, and its components can be found in Part 1, Sections B and C, and Part 2, Sections A.2 and B. The Project Area is mostly flat, though it currently contains areas of wetlands in depressions and frequently flooded areas. Hansen Creek flows along the western side of the Project Area from north to south. The Project Area overlaps the mapped FEMA 100-year Zone A floodplain of Hansen Creek.

Soils and Water Quality Concerns	As mentioned in Part 3.A, the USDA Natural Resources Conservation Service for Skagit County, Washington, identifies the site as containing Field Silt Loam, Minkler Silt Loam, and Sumas Silt Loam soils. The soils present within the Project Area as well as the topography with slopes less than 30 percent indicate that the Project Area is not at risk for erosion hazards (Attachment G). The near surface soils, however, are predominantly composed of fines and are therefore susceptible to disturbance during wet weather conditions or construction if exposed. The erosion potential of the on-site soils is “not rated” at the time of the assessment and no evidence of surficial erosion was found within the Project Area during several site visits. There is no historical or planned usage of pollutants or other hazardous substances within the Project Area that poses a threat to water quality.
Impervious Surfaces	Under current conditions, the Project Area features impervious areas in the form of existing buildings and driveways. Groundwater was encountered at all explorations at a depth of 5 to 9 feet below ground level (Attachment G). The Project Area does not contain any critical aquifer recharge areas and groundwater levels reflect the water surface elevation of Hansen Creek, with infiltration within the Project Area contributing to some extent though not significantly. Historical land use and current development pressure has resulted in compaction and slow infiltration with the Project Area including within and around the existing wetland (Attachment J).
Wetlands and Surface Waters	Per SCC 14.24.220, a wetland delineation was conducted within the Project Area that identified seven depressional wetlands (see Wetland Delineation Report in Attachment J, Critical Areas Report). These wetlands are all classified as Palustrine Emergent (PEM) Category III or Category IV wetlands. They exist in their current configuration as a result of heavy compaction from historical land use and are presently subjected to development pressure from existing land use. Hansen Creek flows along the western side of the Project Area and is designated as a Type S stream, i.e., a Shoreline of the State, and falls under the jurisdiction of the Skagit County Shoreline Management Program. It features a well-defined stream channel, observed to be roughly 25 feet in width, comprising a mix of silt bed and small gravel and flowing in a north-south direction. The stream has a 100-year peak flow rate of 1,180 cubic feet per second and experiences a backwatering effect from the Skagit River which leads to flooding as a result of downstream Skagit River flooding (Attachment K). Hansen Creek is fish bearing and is designated critical habitat for Chinook salmon (Puget Sound Evolutionarily Significant Unit) and steelhead (Puget Sound Distinct Population Segment). Additionally, the stream is also designated as NOAA EFH for the following species: Chinook salmon, coho salmon, and pink salmon (Attachment J).
Floodplain	A majority of the Project Area overlaps with a FEMA-designated 100-year Zone A floodplain associated with Hansen Creek. Additionally, it is classified as a Special Flood Hazard Area by SCC Chapter 14.34.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Surface Water Runoff	A stormwater management area will be designed within the Project Area to capture stormwater runoff within the Project Area. This stormwater management area will be constructed in accordance with the most up-to-date edition of the Ecology SWMMWW and will follow requirements under SCC Chapter 14.32 as applicable including the utilization of Low Impact Development (LID) techniques. The Project is not expected to alter the normal movement of surface water in a manner that would cause the unnatural diversion of floodwater to otherwise flood-free area, following SCC 14.24.630. The stormwater management area will be in the form of a stormwater basin. In addition to sheet flow directly into the basin, runoff will be collected through storm drain inlets installed across the impervious surfaces within the Project Area and conveyed though underground stormwater drains into the stormwater basin for detention. Detention within the stormwater management area will provide residence time to the captured runoff for the settling of suspended solids out of the retained water. Additionally, the basin will be seeded with native species per a Vegetation and Weed Management Plan developed for the site. The Plan will provide increased areas of permeable surfaces to allow for infiltration of surface water into groundwater resources and a reduction in the quantity of stormwater discharge while promoting water quality. The grading of outfall from the basin will be tied into an existing drainage ditch to discharge treated stormwater runoff offsite. Following WAC Titles 173 and 463, a SWPPP and an ESCP will be developed prior to construction. The SWPPP and ESCP will detail specific measures, BMPs, and monitoring efforts that will be instituted to address and appropriately mitigate or prevent impacts from the Project with regards to stormwater runoff. Additionally, all requirements and stipulations of Section 404 of the Clean Water Act (CWA) that regulate activities involving discharge of dredged or fill material into waters of the United States shall be addressed and complied with.
Soils and Water Quality Concerns	The Project Area is not at risk for erosion hazards as none of the criteria listed within SCC 14.24.410(1) are applicable (including slopes greater than 30 percent, containing coastal beaches or bluffs, special areas identified by varying governing bodies, not susceptible to rapid stream incision and bank erosion, etc.). While no evidence of surficial erosion was found within the Project Area during several site visits, the soils are susceptible to erosion as a result of disturbance, especially during construction. Proper implementation and maintenance of BMPs for erosion prevention and sedimentation control will adequately mitigate the erosion potential within the Project Area. Erosion protection measures as required by Skagit County will also be in place prior to and during grading and fill placement activities on the site. As mentioned above, a SWPPP and an ESCP will be developed for the Project Area prior to construction. Some measures to address potential water quality related impacts include collection of all surface flow

	from the impervious surfaces within the Project Area within a stormwater management area. This stormwater management area will be designed to provide residence time to the captured runoff for the settling of suspended solids out of the retained water. Settlement of suspended solids in the extended detention facility is designed to remove particulates at the same efficiency as the predeveloped natural vegetal ground covering. Historical, current, and proposed future land use within the Project Area does not involve the usage of any nutrients and contaminants that pose a risk to water quality, including the event of flooding or other hazards.
Impervious Surfaces	The proposed designs for the Project will result in the creation of approximately 10.1 acres (over 440,000 square feet) of impervious surfaces including the BESS units and associated equipment, driveways and access roads, and graveled areas. This subsequently impacts infiltration of stormwater as well as surface water conveyance within the Project Area, though minimally as infiltration under existing conditions is already poor as a result of compaction from past and existing intensive land use. As mentioned above, the Project will be designed using LID techniques such that impacts from the new impervious surfaces are kept minimum. To avoid increasing stormwater flow from the Project Area, an on-site stormwater management area will be developed in the form of a stormwater basin to provide detention to runoff via sheet flow or an underground storm drain network. The stormwater management area will be seeded with native species per a Vegetation and Planting Plan developed for the site which will provide increased areas of permeable surfaces to allow for infiltration of surface water into ground water resources and a reduction in the quantity of stormwater discharge while promoting water quality. Flood storage will be impacted as a result of the potential addition of fill, but this is not expected to increase flood water elevations by more than 1 foot, in compliance with SCC Chapter 14.34.
Loss of Wetland/Surface Water Functions and Values	Due to the location of the wetlands identified within the Project Area, impacts within the wetland buffers and to the wetlands are unavoidable (Attachment J). The preferred mitigation sequencing of first avoidance, then minimization, and finally compensation for unavoidable wetland impacts was taken into consideration during Project design. The location of the Project Area was chosen due to the needed proximity of the site to the Sedro-Woolley Substation. Due to the constraints of the Project site and surrounding area, particularly regarding property ownership, complete avoidance of the wetlands and their associated buffers is not feasible. Due to the lack of sufficient space for on-site mitigation in the site, this option is not ecologically feasible within the Project Area or likely to succeed. Ultimately, following guidance in 33 CFR Part 332, the option of using an agency-approved mitigation bank to purchase mitigation credits that compensate for impacts to wetlands was assessed as the most feasible option for the Project. The Applicant will pay the mitigation bank based on the determined credit amount. Refer to Part 4.C for further details on wetland impacts as well as proposed appropriate compensatory actions. The Project also involves providing a gen-tie line to connect the energy storge site in the Project Area to the Sedro-Woolley Substation located to the south of the Project Area across Hansen Creek. To connect to the substation, the gen-tie line must cross over Hansen Creek. An overhead connection is not feasible given the existing utilities. Therefore, the connection will be placed underground via directional drilling,

	which adds the additional benefit of avoiding impacts to Hansen Creek. Furthermore, riparian buffer enhancement will be carried out to avoid any indirect impacts to Hansen Creek and will include the demolition of the existing structures within the 200-foot buffer of Hansen Creek. Areas adjacent to the stream and outside the 200-foot buffer will be revegetated with native plants, which will result in the extension of the riparian corridor of Hansen Creek. No significant temporary or permanent impacts are therefore expected to Hansen Creek. Additionally, any activity under this Project that impacts the wetlands within the Project Area and/or Hansen Creek shall meet the compliance requirements of (Ecology under Section 401 of the CWA. This will be done via a Water Quality Certification obtained through the JARPA process. The JARPA process shall also be utilized for compliance with the Shoreline Management Act.
Floodplain	The Project involves construction within the sections of the Project Area designated as a FEMA designated 100-year Zone A floodplain associated with Hansen Creek and Skagit County designated Special Flood Hazard Area. The Project will therefore comply with all standards presented under SCC Chapter 14.34. The Flood Study conducted for the Project Area determined the 100-year BFE to be 61.3 feet. Per SCC 14.34.180 and to mitigate flooding associated risks, the Project Area will be elevated through the placement of fill or elevated on piers so that the foundations of all electrical equipment are at a minimum of 1 foot above BFE (see Site Grading Plan in Attachment B).

C.2. Changes to the Proposal from the Existing Condition		
Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☐ No	☒ Yes
Topical area/issue	Changes	
Site Design and Layout	The proposed Project will be designed to meet the requirements of Skagit County as well as the State of Washington for stormwater management. Appropriate erosion and sediment control and drainage plans will be implemented based on existing conditions and planned impervious surfaces (e.g., roads and other graveled areas) and other identified impacts. The implementation of LID techniques within the Project Area is expected to reduce the physical impact of the Project, including the reduction of the footprint of proposed new impervious surfaces.	

D. Proposed Commitments and Monitoring		
Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes
Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Erosion and Sediment Control BMPs – Stormwater	A SWPPP, an ESCP and a Vegetation and Weed Management Plan will be prepared prior to construction. The SWPPP (for construction and operation) and the ESCP will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The SWPPP and the ESCP will include BMPs from Ecology's 2019 SWMMWW as well as relevant sections of the SCC. A Vegetation and Weed Management Plan will be developed prior to construction and implemented to revegetate temporarily impacted areas and minimize erosion and sedimentation during and after construction.	Ecology
LID techniques	LID techniques are required to be implemented within the Project Area by the standards outlined in the following: a) SCC 14.32.140 Low Impact Development (LID) Techniques and Facilities b) 2019 SWMMWW Volume I Chapter 3 c) SCC 14.34.150 (2) General Standards for Special Flood Hazard Areas The application of LID techniques within the Project will seek to mitigate the impacts to the site as a result of the creation of impervious surfaces by aiming to maintain the hydrologic functionality of the landscape as far as possible at pre-alteration conditions. All relevant provisions and standards within the 2019 SWMMWW and the WSDOT Standard Specifications for Road, Bridge, and Municipal Construction Division 7 and 8 shall also be complied with to the extent feasible during the construction and implementation of stormwater management infrastructure.	Skagit County and Ecology
Wetland/surface waters impacts	SCC 14.24.250 describes various possible wetland alternative compensation projects that can be employed when impacts to existing wetlands cannot be avoided. As on-site avoidance or compensation to impacts towards wetlands within the Project Area is not feasible, off-site compensation measures shall be undertaken in the form of using an agency-approved mitigation bank to purchase mitigation credits. Specific mitigation requirements as part of aquatic resources mitigation and mitigation banking policies and statutes (Title 90 of Chapter 90.74 and RCW 90.84) shall be determined and achieved through the Washington SEPA process and in consultation with permitting agencies. Hansen Creek is designated as a Shoreline of the State and is therefore subject to the requirements and standards of the Shoreline Management Act. Permitting for compliance with the Act shall be achieved through the JARPA process. Additionally, stormwater discharges into Hansen Creek from the Project Area shall be controlled and treated to the extent feasible in accordance with applicable regulations and standards within the 2019 SWMMWW and Section 404 of the CWA, and per measures and BMPs outlined in the SWPPP and the ESCP.	Skagit County and Ecology

Floodplain Developments	All development within the floodplain of Hansen Creek shall aim to conform to the standards within SCC Chapter 14.34, especially SCC 14.34.150 and 14.34.160 (3), and the IBC in order to mitigate any flood-related risks and minimize impacts to the floodplain.	Skagit County

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.G. Runoff, Stormwater & Point Discharges

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Flood Study – Hansen Creek at Minkler Road (Attachment K)	April 2024	Prepared by Power Engineers, consultant for the Applicant	☐ No	☒ Yes
Geotechnical Engineering Report (Attachment G)	June 2023	Prepared by Terra-Geo, Inc., consultant for the Applicant	☐ No	☒ Yes
Critical Areas Report, Goldeneye Energy Storage Project (Attachment J)	May 2024	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Wetland and Stream Delineation Report (Attachment J)	May 2023	Prepared by Skagit Wetlands & Critical Areas, LLC, consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
General	Descriptions of the Project Area, the Project, and its components can be found in Part 1, Sections B and C, and Part 2, Sections A.2 and B. The Project Area is mostly flat, though it currently contains areas of wetlands in depressions and frequently flooded areas. Hansen Creek flows along the western side of the Project Area from north to south. The Project Area overlaps the mapped FEMA 100-year Zone A floodplain of Hansen Creek.
Stream Flow	Hansen Creek is designated as a Type S stream, i.e., a Shoreline of the State, and falls under the jurisdiction of the Skagit County Shoreline Management Program. It features a well-defined stream channel, observed to be roughly 25 feet in width, comprising a mix of silt bed and small gravel and flowing in a north-south direction. The stream has a 100-year peak flow rate of 1,180 cubic feet per second and experiences backwatering effect from the Skagit River that lead to flooding as a result of the downstream Skagit River flooding (Attachment K).

	Hansen Creek has fish presence and is designated critical habitat for Chinook salmon (Puget Sound Evolutionarily Significant Unit) and steelhead (Puget Sound Distinct Population Segment). Additionally, the stream is also designated as NOAA EFH for the following species: Chinook salmon, coho salmon, and pink salmon (Attachment J).
Groundwater Recharge and Water Quantity	Per SCC 14.24.220, a wetland delineation was conducted within the Project Area that identified seven depressional wetlands (see Wetland Delineation Report within Attachment J). These wetlands are all classified as PEM Category III or Category IV wetlands. They exist in their current configuration and show relatively slow infiltration as a result of heavy compaction from historical land use and are presently subjected to development pressure from existing land use. Under current conditions, the Project Area features impervious areas in the form of existing buildings and driveways. Groundwater was encountered at all explorations at a depth of 5 to 9 feet below ground level (Attachment G, Geotech Report). The Project Area does not contain any critical aquifer recharge areas and groundwater levels reflect the water surface elevation of Hansen Creek with infiltration within Project Area contributing to some extent though not significantly.
Flood Risk	A majority of the Project Area overlaps with a FEMA-designated flood hazard "A" zone and is classified as a Special Flood Hazard Area by SCC Chapter 14.34.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Stormwater Runoff	Part 4.E details stormwater and runoff related issues identified within the Project Area, the infrastructure that will be designed to address it, and the relevant proposed mitigations and commitments.
Stream Flow	No significant temporary or permanent impacts on stream flow volume are expected to Hansen Creek. Hydrologic and hydraulic analysis of the Project shows no impact to the flood water elevations of Hansen Creek and the development of the stormwater basin allows for flood storage to compensate for a portion of the storage reduction resulting from proposed fill and new impervious areas (Attachment K). Considering fish presence within Hansen Creek, the Project shall be designed so that there are no impacts to fish use and habitat availability within Hansen Creek, consistent with provisions of SCC 14.24.630 and SCC Chapter 14.34.
Groundwater Recharge and Water Quantity	As mentioned above, the Project Area does not contain any critical aquifer recharge areas, and groundwater levels reflect the water surface elevation of Hansen Creek with infiltration within Project Area contributing to some extent though not significantly. Due to the location of the wetlands identified within the Project Area, impacts within the wetland buffers and to the wetlands are unavoidable (Attachment J), therefore potentially impacting groundwater recharge within the Project Area. Part 4.E details the compensation actions that will be undertaken for the

	proposed permanent impacts to the existing wetlands. Additionally, the utilization of LID techniques for stormwater management, especially in the development of the stormwater basin, mimics and contributes toward the natural hydrologic functionality and potential for recharge within the Project Area that is expected to be otherwise reduced due to the loss of wetlands and new impervious surfaces.
Flood Risk	A majority of the construction will occur within the sections of the Project Area designated as a FEMA Flood Insurance Rate Map flood hazard "A" zone and Skagit County Special Flood Hazard Area. The Project will therefore comply with all standards presented under SCC Chapter 14.34. The Flood Study conducted for the Project Area (Attachment K) determined the 100-year BFE to be 61.3 feet. Per SCC 14.34.180 and to mitigate the potential for flooding, the Project Area will be elevated through the placement of fill or through piers such that the foundations of all electrical equipment are at a minimum of 1 foot above BFE.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☐ No	☒ Yes

Topical area/issue	Changes
Site Design and Layout	The proposed Project will be designed to meet the requirements of Skagit County as well as the State of Washington for stormwater management. Appropriate erosion and sediment control and drainage plans will be implemented based on existing conditions and planned impervious surfaces (e.g., roads and other graveled areas) and other identified impacts. The implementation of LID techniques within the Project Area is expected to reduce the physical impact of the Project, including the reduction of the footprint of proposed new impervious surfaces.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Erosion and Sediment Control BMPs – Stormwater Runoff	A SWPPP, an ESCP, and a Vegetation and Weed Management Plan will be prepared prior to construction. The SWPPP (for construction and operation) and the ESCP will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. The SWPPP and ESCP will include BMPs from Ecology's 2019 SWMMWW as well as relevant sections of the SCC. A Vegetation and Weed Management Plan will be developed prior to construction and implemented to revegetate temporarily impacted areas and minimize erosion and sedimentation during and after construction.	Ecology
LID techniques	LID techniques are required to be implemented within the Project Area by the standards outlined in the following: a) SCC 14.32.140 Low Impact Development (LID) Techniques and Facilities b) 2019 SWMMWW Volume I Chapter 3 c) SCC 14.34.150 (2) General Standards for Special Flood Hazard Areas	Skagit County and Ecology

	The application of LID techniques within the Project will seek to mitigate the impacts to the site as a result of creation of impervious surfaces by aiming to maintain the hydrologic functionality of the landscape and seasonal stream as far as possible at pre-alteration conditions.	
Stream Flow	Hansen Creek is designated as a Shoreline of the State and is therefore subject to the requirements and standards of the Shoreline Management Act. Permitting for compliance with the Act shall be achieved through the JARPA process. Additionally, stormwater discharges into Hansen Creek from the Project Area shall be controlled and treated to the extent feasible in accordance with applicable regulations and standards within the 2019 SWMMWW and Section 404 of the CWA and per measures and BMPs outlined in the SWPPP and the ESCP.	Skagit County and Ecology
Wetland Impacts	SCC 14.24.250 describes various possible wetland alternative compensation projects that can be employed when impacts to existing wetlands cannot be avoided. As on-site avoidance or compensation to impacts towards wetlands within the Project Area is not feasible, off-site compensation measures shall be undertaken in the form of using an agency-approved mitigation bank to purchase mitigation credits. Specific mitigation requirements as part of aquatic resources mitigation and mitigation banking policies and statutes (Title 90 of Chapter 90.74 and RCW 90.84) shall be determined and achieved through the Washington SEPA process and in consultation with permitting agencies.	Skagit County and Ecology
Flood	All development within the floodplain of Hansen Creek shall aim to conform to the standards within SCC Chapter 14.34, especially SCC 14.34.150 and 14.34.160 (3), and the IBC to mitigate any flood-related risks and minimize impacts to the floodplain.	Skagit County

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.I. Animals

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Critical Areas Report, Goldeneye Energy Storage Project (Attachment J)	Completed	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Hansen Creek Western Toad Surveys Memorandum (Attachment J)	Completed	Coli Huffman, Ecological Land Services, Biologist	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Special-status Species	Species defined as "special-status wildlife species" in this report include endangered and threatened wildlife species recognized in the context of the Endangered Species Act; Birds of Conservation Concern designated by the USFWS; state endangered, threatened, proposed, and candidate species; species of concern; and state sensitive and priority species. Based on an initial literature review, database search, and a reconnaissance-level biological survey, habitat within the Project site provides a potential for these listed species to occur: Chinook salmon (*Oncorhynchus tshawytscha*), steelhead (*Oncorhychus mykiss*), bull trout (*Salvelinus confluentus*), Dolly Varden (*Salvelinus malma*; migration only), western toad (*Anaxyrus boreas*), little brown bat (*Myotis lucifugus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and Yuma myotis (*Myotis yumanensis*). Special-status fish species have the potential to occur within Hansen Creek; however, because the proposed Project will utilize directional drilling to place the gen-tie alignment underground, impacts to the creek are not expected. Any work taking place in Minkler Road will stay within the roadway and will not result in impacts to the creek. Figure 9 of the Critical Areas Report (Attachment J) provides the location of the gen-tie alignment where it will be placed underground along with the points at which the line will be

	moved aboveground. Figure 9 also provides the location of the jack and bore easement and vault installation work area, both of which are temporary work areas. Potential habitat for the bat species includes the outbuildings at the west end of the property and trees at the edges of the property. No bat activity has been detected during surveys and therefore no impacts to special-status bats are expected. Western toad has a moderate potential to occur within the Project site because it can occupy a wide range of habitats, including woodlands. Ponded wetlands also occur on site, which could support the species. There were no western toad egg masses, tadpole/larvae, or adult western toads observed during the surveys. It appears that the on-site habitat conditions, primarily swift moving water and a minimal amount of persistent, in-water vegetation, may not lend to preferred breeding habitat for western toads. Therefore, the proposed Project will not have a direct impact on western toads or their habitat.
Noise, Light and Glare	The Project site supports suitable habitat for nesting bird species. Nesting birds are protected under the federal Migratory Bird Treaty Act and compliance with this regulation is required. Project plans include the removal of vegetation considered suitable for nests. Additionally, indirect impacts to nesting birds from short-term construction-related noise could result in decreased reproductive success or abandonment of an area used for nesting if conducted during the nesting season (i.e., February through August).

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Special-status fish species	A 200-foot avoidance buffer has been applied to Hansen Creek in order to ensure the proposed Project does not have any indirect impacts on the creek. The gen-tie connection will be placed underground via directional drilling to eliminate direct impacts to the creek and species.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
N/A	N/A

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Avoidance and minimization measures	During siting and design, the Applicant took several measures to avoid and minimize impacts to wildlife and habitat, including avoidance of Hansen Creek.	WDFW

	Dudek contacted the local WDFW staff via email to discuss the potential for special-status species identified during the literature review and database search to occur within the Project boundary. The email confirmed Dudek's assessment of species with a potential to occur within Project boundary and also provided survey recommendations and methods which will be utilized to determine presence/absence of these species. Implementation of Avoidance and Minimization Measure (AMM)-1 will help ensure that potential impacts to nesting birds are less than significant. **AMM-1:** Vegetation removal and initial ground-disturbing activities should occur outside the nesting season, which generally occurs from February through August, to avoid potential impacts to nesting birds. This will ensure that no active nests are disturbed, and that vegetation removal can proceed rapidly. If vegetation removal and initial ground-disturbing activities occur during the nesting season, all suitable habitat shall be thoroughly surveyed by a qualified biologist for the presence of nesting birds before commencement of clearing. If any active nests are detected, a buffer of at least 50 feet (250 feet for raptors) should be delineated, flagged, and avoided until the nesting cycle is complete, as determined by a qualified biologist.	
BMPs	Noise BMPs will be implemented to reduce noise impacts to sensitive receptors adjacent to the proposed Project (see Section 4.P of this application).	

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.L. Site Contamination

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Phase 1 Environmental Site Assessment (ESA) (Attachment L)	April 2022	Prepared by Dudek, consultant for the Applicant	☐ No	☒ Yes
Phase 2 ESA (Attachment M)	July 2024	Prepared by Dudek, consultant for the Applicant	☒ No	☐ Yes
Have all proposed studies for this topic been completed?			☒ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Existing Infrastructure	**Structures** The four existing structures within the Project Area will be demolished as part of Project construction, as agreed upon with the landowner; they are located on the eastern portion of the Project site. A septic leach field is also associated with the western adjoining structure and was installed in 1973. The septic leach field will also be removed as agreed upon by the landowner. **Water Line** Water during construction and operations (including for the purposes of fire suppression) will be provided by an existing Skagit Public Utilities District water line in Minkler Road, which will be upgraded to supply a sufficient water volume. This water line is made of 4- to 6-inch-diameter asbestos concrete and PVC pipes and will be upgraded to 8-inch-diameter ductile iron to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. **Other Infrastructure** Adjacent properties outside of the Project Area are mainly rural residential and agricultural. The Project will interconnect with the existing PSE Sedro-Woolley Substation, located approximately 0.4 mile

	southwest of the Project site. Existing transmission lines are present within the Project Area. No other infrastructure is located within the Project Area.
Site Contamination	The following is summarized from the Phase 1 ESA (Attachment L): No evidence of septic system failure or agricultural related site contamination was evident during a walkthrough of the property. No hazardous material pipelines were observed within the Project Area. While there is no known site contamination on-site, there are potential contamination sources on nearby properties that may result in contamination of groundwater within the Project Area. The general area has a typical presence of saturated soils during the rainy season, which facilitates ground contamination entering the groundwater system. In this way, groundwater contamination from neighboring properties may travel underground into the Project Area. This will be determined as part of the Phase 2 ESA, which will be provided under separate cover when it is available. One neighboring property to the northwest containing vehicles and heavy equipment in various states of repair is a known source of groundwater contamination that has been confirmed by multiple regulating agencies. On the PSE Sedro-Woolley Substation located southwest of the Project Area, petroleum-contaminated soils have been identified. Groundwater contamination from this source is possible but has not been evaluated or confirmed. Hansen Creek is located between the substation site and the Project Area, likely creating a groundwater barrier and, due to the viscous nature of the petroleum oils, they are not likely to migrate significantly beyond their original source. A commercial chicken farm on an adjacent property to the east has been operating for more than 20 years and may be a source of groundwater contamination, but this has not been evaluated or confirmed. A drainage swale/tributary to Hansen Creek runs along the eastern side of the Project Area and may provide a groundwater barrier from any groundwater contamination traveling from the chicken farm to the Project Area.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Site Contamination	Construction of the Project will require soil disturbance which will expose soils that may have been contaminated by groundwater migrating from adjacent properties. The Phase 2 ESA report (Attachment M) will confirm whether groundwater contamination is within the Project Area. Grading, excavating, and filling will occur during construction of the Project. Approximately 67,000 cubic yards of fill material will be sourced from a local permitted supplier. Approximately 35,500 cubic yards of topsoil and subsoil will be excavated and hauled offsite. Soil will be tested prior to removal offsite to confirm no hazardous materials are present and will be disposed of as construction debris or soil fill at an approved facility. The Applicant or the Applicant's contractor will manage noxious weeds and control vegetation during construction and operations. The Project will only use herbicides that are approved for use in the state

	of Washington by the EPA and the Washington State Department of Agriculture. As needed, herbicides will be transported and applied to the Project Area but will not be stored in the Project Area. During construction of the Project, small amounts of hazardous materials such as petroleum, oils, and lubricants will be kept onsite. The hazardous materials will follow the procedures for containments outlined within the SPCC Plan. The SPCC Plan provides preventative procedures and rapid response measures to handle hazardous spills if one were to occur and reduce the risk of potential soil or groundwater contamination to negligible. During operation, these hazardous materials will not be stored on site, but will be brought to the site on an as-needed basis. The Applicant is proposing to construct a standalone BESS that will use lithium-ion batteries. According to the EPA's definition of hazardous waste, lithium-ion batteries may include hazardous substances within internal battery components that would fall under ignitability (D001) and reactivity (D003) (EPA 2024). In the case of battery failure, systems are in place to notify the operator, suppress the failure, and contain the failure. Lithium-ion batteries are flammable and require cooling systems (composed of ethylene glycol-based coolant and/or fans) to prevent overheating. The BESS will use integrated safety systems to monitor battery performance, detect malfunctions, and implement response measures (such as notifying operators, depowering the system, or deploying fire suppression devices). The automatic fire protection and alarm system will be designed in compliance with WAC 51-54A-0322 Section 322.4.2.3. Batteries will be housed in leak-proof containers to prevent unintentional releases of hazardous materials. Additionally, battery containers will be designed and spaced in accordance with WAC 51-54A-0322 Section 322.4.1, and 322.4.2 as applicable. The EPA considers lithium-ion batteries generally safe when used, stored, and charged appropriately (EPA 2023). Operations staff will conduct inspections of the battery cells for damage. Lithium-ion batteries have a typical lifespan of thousands of cycles and 20+ years and will experience degradation of capacity and efficiency over that time. The lithium-ion battery technology under consideration for this Project is lithium iron phosphate and will be designed for the 20-year life of the Project but will require periodic augmentation to make up for the capacity lost to degradation. Replacement of lithium-ion batteries will be handled by a qualified contractor and adhere to applicable regulations for transport and disposal, including, but not limited to, 49 CFR § 173.159. Spent batteries will be disposed of at a facility permitted to handle them in compliance with applicable Resource Conservation and Recovery Act and Toxic Substances Control Act regulations administered by the EPA or Ecology. Project operations will not require large quantities of fuels, oils, or chemicals in the Project Area, except those required for the operation of certain Project components where such substances are fully contained (e.g., transformers, inverters, and certain BESS equipment). Ethylene glycol, refrigerant, and lubricating oils will be kept in the operations and maintenance storage containers on site; note that all BESS equipment will come pre shipped with 136 gallons of ethylene glycol-based coolant. Small amounts may be kept in storage for maintenance purposes.

	If the Phase 2 ESA report identifies soil or groundwater contamination, then mitigation methods will be implemented as outlined in the report. Site contamination of soils may require physical removal of those soils and some buffer distance of surrounding soils and replacement with clean soil. Any soil removal efforts would target the soil concentrations of the relevant contaminant rising above Model Toxics Control Act Method A cleanup levels applicable to the site. Groundwater contamination could be more complex, especially if the source of the contamination is coming from an adjacent property. If deemed appropriate by the relevant regulating bodies and stakeholders, mitigation methods may be implemented onsite. If the groundwater contamination was deemed to come from an on-site source, that source would be removed, and mitigation methods would be implemented to clean up remaining contaminants. **References:** EPA (U.S. Environmental Protection Agency). 2023. Improving Recycling and Management of Renewable Energy Wastes: Universal Waste Regulations for Solar Panels and Lithium Batteries. Available online at: https://www.epa.gov/hw/improving-recycling-and-management-renewable-energy-wastes-universal-waste-regulations-solar#lithium EPA. 2024. Defining Hazardous Waste: Listed, Characteristic and Mixed Radiological Wastes. Available online at: https://www.epa.gov/hw/defining-hazardous-waste-listed-characteristic-and-mixed-radiological-wastes#characteristic (access June 24, 2024).
Existing Infrastructure	**Structures** The four existing structures within the Project Area will be demolished as part of Project construction, as agreed upon with the landowner. The septic leach field is utilized by one of the existing houses and will subsequently be demolished once the structures have been removed. **Water Line** The existing water line in Minkler Road will be upgraded to an 8-inch-diameter ductile iron pipe to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. In accordance with the Skagit PUD's policy, the Applicant will implement upgrades and then deed the line to the Skagit PUD. Permitting for water line upgrades is handled through Skagit County. Water supply will be sized for simultaneous operation of two hydrants. The Applicant discloses this information here for informational purposes only. Upgrades and maintenance to the water line are not requested under this ASC. **Natural Gas Pipeline** Since there are no underground hazardous liquid or natural gas transmission pipelines within the Project Area and none are proposed as part of the Project, no change to this existing condition will occur. **Other Infrastructure** The Project will introduce new subsurface infrastructure such as a 230-kV transmission line, which will connect to the existing PSE Sedro-Woolley Substation and transmission infrastructure. Proposed subsurface infrastructure will not contain hazardous materials or pose significant fire risk. No changes

	will occur to existing transmission lines outside of the transmission line interconnection. The Applicant is coordinating with PSE regarding the proposed interconnection actions.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☐ No	☒ Yes

Topical area/issue	Changes
Site Contamination	As previously mentioned, contaminated groundwater could have migrated to the site from adjacent properties. A Phase 2 ESA is being conducted to verify whether Project construction would encounter contaminated materials. If materials are found to be contaminated, a plan for avoidance or removal would be developed.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
CSWGP, Construction Phase SWPPP, and ESCP	The Applicant will obtain a CSWGP from Ecology, which requires an ESCP and SWPPP. The ESCP and SWPPP (for construction and operation) will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. Applicable laws/codes include the following: • RCW 90.48, which establishes general stormwater permits for Ecology under the Water Pollution Control Act • WAC 173-200, 201A, and 463-76 Water Quality Standards for Surface Waters of the State of Washington • CWA (33 United States Code 1251)	EFSEC, Ecology
Use of approved herbicides	In compliance with RCW 17.10.140, the Applicant will only use herbicides that are approved for use in the state of Washington by the EPA.	EPA, EFSEC, Ecology, and the Skagit County Noxious Weed Control Board
SPCC Plan	Consistent with the requirements of 40 CFR Part 112, the Applicant will prepare an SPCC Plan to prevent spills during construction and operations and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures will address and prevent potential risks to water quality. The plan will be prepared pursuant to the requirements of: • CFR Part 112 • Sections 311 and 402 of the CWA • Section 402(a)(1) of the Federal Water Pollution Control Act	EFSEC, Ecology

Have all final proposed commitments been identified?	☐ No	☒ Yes
E. Effects on Other Environmental Elements Not Yet Discussed		
Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.M. Environmental Health – Hazardous Materials

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Phase 1 ESA (Attachment L)	April 2022	Prepared by Dudek, consultant for the Applicant	☐ No	☒ Yes
Phase 2 ESA (Attachment M)	July 2024	Prepared by Dudek, consultant for the Applicant	☒ No	☐ Yes
Fire Protection Plan (Attachment N)	June 2024	Prepared by Power Engineers, consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☒ No	☐ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Hazardous Materials	According to the completed Phase 1 ESA (Attachment L), the Project Area was previously used for agricultural purposes from at least 1941 until the 1970s. Since then, it has been an open field. Results of the Phase 1 ESA concluded that the Harris Property, located approximately 350 feet northwest of the subject property, has been storing and working on vehicles on the property for many years. Site visits by multiple agencies identified open barrels of fluids, batteries stored on bare ground, and vehicles and heavy equipment stored without first removing the fluids. The same regulatory agencies have confirmed volatile organic compound (VOC) contamination in soils and suspect VOC contamination in groundwater based on the elevated concentrations of contaminants of concern, the typical presence of saturated soils during the rainy season, and long-term use of the site as a vehicle storage yard. Based on the estimated groundwater flow direction, shallow occurrence of groundwater, and vicinity of this site, migration of contamination may have occurred toward the subject property. This will be determined as part of the Phase 2 ESA (Attachment M). Additionally, petroleum-contaminated soils have been identified on the PSE Sedro-Woolley Substation located southwest of the Project Area. Groundwater contamination is suspected, as groundwater has not been fully characterized. Hansen Creek is located between this site and the Project Area, likely creating a

	hydraulic barrier, and heavy oils related to transformers are viscous and are not likely to migrate significantly beyond their original source. Therefore, migration of contamination to the Project Area from this source is not likely.
Existing Infrastructure	**Structures** The four existing structures within the Project Area will be demolished as part of Project construction, as agreed upon with the landowner; they are located on the eastern portion of the Project Area. A septic leach field is also associated with the western adjoining structure and was installed in 1973. The septic leach field will also be removed as agreed upon by the landowner. **Water Line** Water during construction and operations (including for the purposes of fire suppression) will be provided by an existing Skagit PUD water line in Minkler Road, which will be upgraded to supply a sufficient water volume. This water line is made of 4-to-6-inch diameter asbestos concrete and PVC pipes and will be upgraded to 8-inch-diameter ductile iron to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. **Fire Hydrants** No fire hydrants are currently located at the Project Area. **Natural Gas Pipeline** The natural gas pipeline was installed adjacent to the northernmost corner of the subject property between 1975 and 1981. The pipeline is owned by Northwest Pipeline, LLC and will remain onsite during construction and operation of the Project. **Other Infrastructure** Adjacent properties outside of the Project Area are mainly rural residential and agricultural. The Project will interconnect with the existing PSE Sedro-Woolley Substation, located approximately 0.4 mile southwest of the Project Area. Existing transmission lines are present within the Project Area. No other infrastructure is located within the Project Area.
Risk of Fire or Explosion	See Attachment N (Fire Protection Plan) and Part 4, Section 4.S for further discussion of fire risk.
Fire Protection Plans and Services	See Attachment N. Additionally, prior to construction, the Project will develop and maintain an Emergency Management Plan. Both plans will include BMPs for fire prevention. The Applicant will coordinate with the Sedro-Woolley Fire Department, Skagit County Fire Marshall, Skagit County Emergency Management, and DNR Wildland Fire Management Division.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Hazardous Materials, Pollutants, and Contaminants	Construction of the Project will require soil disturbance, which will expose soils that may have been contaminated by adjacent properties. The Phase 2 ESA report will assess whether soil or groundwater contamination is present within the Project Area. Grading, excavating, and filling will occur during construction of the Project. Approximately 67,000 cubic yards of fill material will be sourced from a local permitted supplier. Approximately 35,500 cubic yards of topsoil and subsoil will be excavated and hauled offsite. Soil will be tested prior to removal offsite to confirm no hazardous materials are present and will be disposed of as construction debris or soil fill at an approved facility. The Applicant or the Applicant's contractor will manage noxious weeds and control vegetation during construction and operations. The Project will only use herbicides that are approved for use in the state of Washington by the EPA and the Washington State Department of Agriculture. As needed, herbicides will be transported and applied to the Project Area but will not be stored in the Project Area. During construction of the Project, small amounts of hazardous materials such as petroleum, oils, and lubricants will be kept onsite. The hazardous materials will follow the procedures for containment outlined within the SPCC Plan. The SPCC Plan provides preventative procedures and rapid response measures to handle hazardous spills if one were to occur, and to reduce the risk of potential soil or groundwater contamination to negligible. During operation, these hazardous materials will not be stored on site but will be brought to the site on an as-needed basis. The Applicant is proposing to construct a standalone BESS that will use lithium-ion batteries. According to the EPA's definition of hazardous waste, lithium-ion batteries may include hazardous substances within internal battery components that would fall under ignitability (D001) and reactivity (D003) (EPA 2024). In the case of battery failure, systems are in place to notify the operator, suppress the failure, and contain the failure. Lithium-ion batteries are flammable and require cooling systems (composed of ethylene glycol-based coolant and/or fans) to prevent overheating. The BESS will use integrated safety systems to monitor battery performance, detect malfunctions, and implement response measures (such as notifying operators, depowering the system, or deploying fire suppression devices). The Project will utilize an Original Equipment Manufacturer–provided battery management system (BMS) that meets all applicable code requirements including NFPA 855 and NFPA 72. The BMS will monitor key parameters, including state of charge, state of health, voltage, current, and temperature of the system. The BMS acts as a first line of defense by immediately detecting abnormal operations and automatically electrically isolating the malfunctioning portions of the system. This will prevent thermal runaway from occurring in most scenarios. In the event that thermal runaway were to occur, the BMS will provide smoke, offgas, or radiant energy detection, and these alarm signals will be transmitted to the operations center. This will allow for rapid detection and early response to any potential thermal runaway scenario. The automatic fire protection and alarm system will be designed in compliance with WAC 51-54A-0322 Section 322.4.2.3.

	Batteries will be housed in leak-proof containers to prevent unintentional releases of hazardous materials. Additionally, battery containers will be designed and spaced in accordance with WAC 51-54A-0322 Section 322.4.1, and 322.4.2 as applicable. The EPA considers lithium-ion batteries generally safe when used, stored, and charged appropriately (EPA 2023). Operations staff will conduct inspections of the battery cells for damage. Lithium-ion batteries have a typical lifespan of thousands of cycles and 20+ years and will experience degradation of capacity and efficiency over that time. The lithium-ion battery technology under consideration for this Project is lithium iron phosphate and will be designed for the 20-year life of the Project but will require periodic augmentation to make up for the capacity lost to degradation. Replacement of lithium-ion batteries will be handled by a qualified contractor and adhere to applicable regulations for transport and disposal, including, but not limited to, 49 CFR § 173.159. Spent batteries will be disposed of at a facility permitted to handle them in compliance with applicable Resource Conservation and Recovery Act and Toxic Substances Control Act regulations administered by the EPA or Ecology. During normal operation, there are no gas or air emissions from the batteries. The BMS will provide smoke, offgas, or radiant energy detection that is designed to quickly and effectively detect thermal runaway should this begin to occur. Any potential emissions would dissipate quickly in the air to safe levels. Generally even in the unlikely event of a thermal runaway event, there would be no unsafe levels of gases within a few hundred feet of a malfunctioning unit. Project operations will not require large quantities of fuels, oils, or chemicals in the Project Area, except those required for the operation of certain Project components where such substances are fully contained (e.g., transformers, inverters, and certain BESS equipment). Ethylene glycol, refrigerant, and lubricating oils will be kept in the operations and maintenance storage containers on site; note that all BESS equipment will come pre-shipped with 136 gallons of ethylene glycol–based coolant. Small amounts may be kept on hand in storage for maintenance purposes. If the Phase 2 ESA report identifies soil or groundwater contamination, then mitigation methods will be implemented as outlined in the report and agreed by the Washington Department of Ecology, up to and including removal of contaminated materials as needed to protect the public and the environment. **References:** EPA (U.S. Environmental Protection Agency). 2023. Improving Recycling and Management of Renewable Energy Wastes: Universal Waste Regulations for Solar Panels and Lithium Batteries. Available online at: https://www.epa.gov/hw/improving-recycling-and-management-renewable-energy-wastes-universal-waste-regulations-solar#lithium EPA. 2024. Defining Hazardous Waste: Listed, Characteristic and Mixed Radiological Wastes. Available online at: https://www.epa.gov/hw/defining-hazardous-waste-listed-characteristic-and-mixed-radiological-wastes#characteristic (access June 24, 2024).
Existing Infrastructure	**Structures**

	The four existing structures within the Project Area will be demolished as part of Project construction, as agreed upon with the landowner. The septic leach field is utilized by one of the existing houses and will subsequently be demolished once the structures have been removed. **Water Line** The existing water line in Minkler Road will be upgraded to an 8-inch-diameter ductile iron pipe to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. In accordance with the Skagit PUD's policy, the Applicant will implement upgrades and then deed the line to the Skagit PUD. Permitting for water line upgrades is handled through Skagit County. Water supply will be sized for two hydrants simultaneous operation. The Applicant discloses this information here for informational purposes only. Upgrades and maintenance to the water line are not requested under this ASC. **Fire Hydrants** Multiple fire hydrants will be installed to serve the Project. These fire hydrants have been provided throughout the BESS for First Responders to provide water streams to surrounding equipment or structures. Hydrant hose nozzles shall be sized to deliver up to 250 gallons per minute per nozzle. **Natural Gas Pipeline** Since there are no underground hazardous liquid or natural gas transmission pipelines and none are proposed as part of the Project, no change to this existing condition will occur. **Other Infrastructure** The Project will introduce new subsurface infrastructure such as a 230-kV transmission line, which will connect to existing PSE Sedro-Woolley Substation and transmission infrastructure. Proposed subsurface infrastructure will not contain hazardous materials nor pose significant fire risk. No changes will occur to existing transmission lines outside of the transmission line interconnection. The Applicant is coordinating with PSE regarding the proposed interconnection actions.
Risk of Fire or Explosion	See Attachment N (Fire Protection Plan) and Part 4, Section 4.S for further discussion of fire risk.
Emergency Management Plan	The Emergency Management Plan (developed prior to construction) will address worker health and safety, as well as fire prevention and control measures for construction and operation. Access roads will have a compacted gravel surface, with a permanent width of approximately 24 feet as well as the required clearance and turning radius needed for emergency response vehicles, in accordance with fire code. The final layout will be provided to the Skagit County Fire Marshal's Office and Sedro-Woolley Fire Department.

C.2. Changes to the Proposal from the Existing Condition		
Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☐ No	☒ Yes
Topical area/issue	Changes	
Existing Infrastructure	See Attachment N (Fire Protection Plan) and Part 4, Section 4.S for further discussion of fire risk.	

Site Contamination	Contaminated soils are considered unlikely to be present on site based on the Phase I ESA. However, contaminated groundwater could have migrated toward the site based on the history of soil contamination on adjacent property. If contaminated soils or groundwater are identified within the Project Area during the Phase II ESA, these may require special handling or additional excavation and disposal of contaminated material during construction of the Project. A plan for handling any contaminated material will be developed if required based on the results of the Phase II ESA.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Emergency Management Plan	Prior to Project construction and operations, the Applicant will develop an Emergency Management Plan to address worker health and safety, standards concerning potential release of hazardous materials, and fire prevention and control. This plan will provide safety guidelines and procedures for potential emergency-related incidents during the Project's construction, operation, and decommissioning phases. This includes coordination with emergency service providers and fire suppression measures associated with the Project. Specifically, the plan will be developed with input from, and in coordination with, the Skagit County Emergency Management, Skagit County Sheriff, Skagit County Fire Marshal, and DNR Wildland Fire Management Division. Applicable laws/codes include: • WAC 463-60-352 (2 through 4), which addresses fire and explosion, hazardous materials release, and safety standards compliance. • WAC 463-60-352(6), which describes emergency plans to ensure public safety and environmental protection. • 49 CFR §173.185m, which regulates the transportation of lithium-ion batteries. • 49 CFR §173.159, which regulates the transportation of lead-acid batteries. • International Fire Code	Skagit County Emergency Management, Skagit County Sheriff, Sedro-Woolley Fire Department, and Skagit County Fire Marshal
Fire Protection Plan	See Attachment N and Part 4, Section 4.S for further discussion of fire risk. To minimize the risk of fire or explosions, the Project will implement BMPs. Typical BMPs will include, but are not limited to, the following: • Equip control building with fire extinguishers of pressurized water, dry chemical powder, or Carbon dioxide, as appropriate.	N/A

	• Use BESS equipment that is rated for containment and control of any internal fires without spreading to any adjacent equipment. • Install fire water service mains and hydrants at start of the project to ensure ability to respond to a fire incident immediately during construction or normal operations at any point on the BESS site. • Secure the site with perimeter fencing with controlled access to the site by authorized personnel only. • Minimize vegetation on the site. Limit combustible materials to stormwater management facilities only. • Establish roads before accessing the site to minimize vehicle contact with grass. • Use diesel construction vehicles instead of gasoline vehicles, where feasible, to prevent potential ignition by catalytic converters. • Prohibit vehicles from idling in grassy areas. • Restrict the use of high temperature equipment in grassy areas. • Monitor wildfire activity during Project construction and operations and, if necessary, modify Project activities, change the schedule, cease construction operations, or remove equipment. • Install lightning protection masts to protect generators and other equipment. • Install fire protection equipment in accordance with Washington state fire code. • Notify the local fire district of construction plans and access to Project equipment. • Provide mutual assistance in the case of fire in or around the Project during construction. • Prevent and control potential fires inside the Project Area with trained staff who have 24-hour access to the site.	
Building Permits	Project design and engineering will adhere to the applicable requirements of the National Electric Code, NFPA Standards, and Institute of Electrical and Electronics Engineers Standards. The Project will comply with the current codes at the time of construction, demonstrating compliance with WAC 463-62-020.	Skagit County Building Division, Skagit County Fire District, and Washington State Building Code Council
BESS Design	The BESS will contain a fire suppression and detection system in accordance with fire code and NFPA Standards, specifically NFPA 855 “Standard for the Installation of Stationary Energy Storage Systems.” The system will include monitoring equipment and alarm systems with remote shut-off capabilities.	NFPA

CSWGP, Construction Phase SWPPP, and ESCP	The Applicant will obtain a CSWGP from Ecology, which requires an ESCP, SWPPP. The ESCP and SWPPP (for construction and operation) will address stormwater runoff, flooding, and erosion to ensure compliance with state and federal water quality standards. Applicable laws/codes include the following: • RCW 90.48, which establishes general stormwater permits for Ecology under the Water Pollution Control Act • WAC 173-200, 201A, and 463-76 Water Quality Standards for Surface Waters of the State of Washington • CWA (33 United States Code 1251)	EFSEC, Ecology
Use of approved herbicides	Additionally, in compliance with RCW 17.10.140, the Applicant will only use herbicides that are approved for use in the state of Washington by the EPA.	EPA, EFSEC, Ecology, and the Skagit County Noxious Weed Control Board
SPCC Plan	Consistent with requirements of 40 CFR Part 112, the Applicant will prepare an SPCC Plan to prevent spills during construction and operations and to identify measures to expedite the response to a release if one were to occur. Preventative procedures and rapid response measures will address and prevent potential risks to water quality. The plan will be prepared pursuant to the requirements of: • CFR Part 112 • Sections 311 and 402 of the CWA • Section 402(a)(1) of the Federal Water Pollution Control Act	EFSEC, Ecology

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.N. Land Use, Natural Resources, Shore

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Land Use Consistency Review (Attachment H)	June 2024	Tetra Tech, environmental consultant for the Applicant	☐ No	☒ Yes
Critical Areas Report (Attachment J)	May 2024	Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Existing land use	The Project is sited across five parcels (P40030, P40042, P40046, P40047, and P40022). Legal descriptions of each parcel are included in Part 1.A.3 of this ASC. The Project Area is primarily undeveloped and currently includes pasture fields, with a small section of scrub/shrub habitat present near the southeastern corner. A portion of the Project Area encompasses four existing structures, which the underlying landowner has agreed to demolish as part of Project construction. The Project Area is mostly flat, though it contains areas of wetlands and frequently flooded areas; Note that Project infrastructure will be elevated above the flood depth in accordance with the Site Grading Plan (Attachment B, Figure C2-1). The Project Area is mostly within the mapped Federal Emergency Management Agency (FEMA) floodplain. The Applicant understands that construction of the Project will require a Floodplain Development Permit. Per the Skagit County Comprehensive Plan (SCCP) designation and zoning district (see below), the Project is primarily within designated agricultural land, except for a segment of the underground water line to be upgraded as part of the Project (and located within road right-of-way). "Major utility developments" are allowed in the Agricultural Natural Resource Lands (Ag-NRL) zone as a hearing examiner special use. Land uses surrounding the Project Area include rural single-family residences, pastureland, and infrastructure. The Project Area is bordered on the north by Minkler Road and is crossed in a roughly north-south direction by Hansen Creek and electrical transmission lines that connect to the Sedro-Woolley Substation.

	Ten residences are located within 500 feet of the Project, with seven residences within 500 feet of the BESS facility fence line and three residences within 500 feet of the transmission line right-of-way and/or edge of access road (see Figure 3 in Attachment A).
Proximity to Point of Interconnect	There is no current electrical generation service within the Project parcels. The BESS portion of the Project has been sited on tax lot P40030, as it is the only viable location within 1 mile of the point of interconnection (POI), the Sedro-Woolley Substation. The Sedro-Woolley Substation was chosen as it is the only POI in this generation-constrained area of substantial growth that has an appropriate interconnection voltage, and it also has a low cost to upgrade and interconnect, resulting in a lower cost to the ratepayer. The existing residence on this parcel is connected to local utility service.
Skagit County Comprehensive Plan Designation	The Project is primarily located within Skagit County's Ag-NRL designation. Ag-NRL are those "with soils, climate, topography, parcel size, and location characteristics that have long-term commercial significance for farming" (County 2016). Additionally, as mentioned above, a segment of underground water line to be upgraded as part of the Project is located outside the Ag-NRL designation, entirely within the road right-of-way.. **Reference:** County (Skagit County). 2016. Comprehensive Plan 2016-2036. Adopted by the Board of County Commissioners through Ordinance O20160004 on June 30, 2016. Available online at: https://www.skagitcounty.net/Departments/PlanningAndPermit/comp_toc.htm
Skagit County Zoning Designation	The Project is primarily within Skagit County's Ag-NRL zoning district, defined under SCC Section 14.16.400. Per SCC 14.16.400(1), the purpose of the Ag-NRL zone is to "provide land for continued farming activities, conserve agricultural land, and reaffirm agricultural use, activities and operations as the primary use of the district." The Ag-NRL zone allows "major utility developments" as a hearings examiner special use. Additionally, a segment of the underground water line to be upgraded as part of the Project is located outside the Ag-NRL zone, entirely within road right-of-way..
Skagit County Administrative Interpretation	In 2023, the Applicant submitted a formal Administrative Interpretation to the County requesting the Project be classified as a "major utility development." On February 1, 2023, Skagit County Planning and Development Services approved Administrative Interpretation request #PL22-0460 (included as Appendix A to the Land Use Consistency Review [Attachment H of this ASC]). Therefore, above and in the Land Use Consistency Review, the permit pathway and standards addressed are focused on the Project's classification as a "major utility development".
Skagit County Critical Areas	As discussed in the Critical Areas Report (included as Attachment J to this ASC) and in Parts 4.A, 4.C, 4.E, 4.G, 4.H, and 4.I, the Project Area includes critical areas for wetlands, frequently flooded areas, geologic hazards, and fish and wildlife habitat conservation. Additional details regarding existing conditions for these critical areas are provided in their respective Part 4 sections.
Shoreline Master Program	The Project has been sited and designed to avoid designated shoreline areas and associated buffers, as demonstrated in Section 4.6 of the Land Use Consistency Review, included as Attachment H to this ASC.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Changes to land use	The Project parcels total approximately 48 acres within Skagit County's Ag-NRL zone. However, the main Project components (BESS units, substation, supporting components, parking areas, and on-site maintenance infrastructure) will only occupy approximately 7 acres. The access road segment will occupy approximately 1.4 acres. The main Project parcel (P40030, owned by John F Grinder and shown on Figure 2 in Attachment H) is approximately 14 acres and zoned Ag-NRL. Approximately half of this parcel is currently developed with four existing structures and three overhead transmission lines, which leaves approximately 7 acres, a relatively small area, available for agricultural activities. This remaining area is also disconnected from larger agricultural production areas, as Minkler Road borders the northwestern portion of the parcel and the underlying landowner does not own any of the abutting parcels. As discussed in Section 1.1 of the Land Use Consistency Review (Attachment H of this ASC), the purpose of the Project is to provide a service to the regional electric grid by receiving energy (charging) from the PSE electric transmission system, storing energy on site, and then later delivering energy (discharging) back to the point of interconnection, the Sedro-Woolley Substation. Due to the nature of the Project, it must be sited near an existing substation. Furthermore, this parcel is the only viable location for the Project within 1 mile of this point of interconnect. This is demonstrated in the alternatives analysis, included as Appendix B to the Land Use Consistency Review, which itself is included as Attachment H to this ASC. For the reasons detailed above, the Project site is not ideal for agricultural activities. The new transmission line connecting the Project substation to the point of interconnect (Sedro-Woolley Substation) and the waterline to be upgraded as part of the Project will both be sited entirely underground, and once operational are not anticipated to result in aboveground impacts. The Project would not affect or be affected by land uses on nearby or adjacent properties, including normal business operations of working farmland (see the Land Use Consistency Review, Attachment H, for additional details). No people would reside or work in the completed Project. As previously mentioned, four structures would be previously demolished; however, no people would be unwillingly displaced by the Project as the underlying landowner has willingly agreed to demolish these structures.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
Proximity to existing PSE substation	The Project would be a valuable energy resource for electrical customers within Skagit County, as the Project would allow for storage of electrical energy at times of peak renewable energy production and subsequent use of stored energy at times of peak demand. The Project would support implementation of the Washington Clean Energy Transformation Act (2019) by allowing for increased utilization of renewable

	energy produced in Skagit County and grid stabilization as the State of Washington undergoes transformation of the electrical system to 100 percent carbon-neutral by 2030 and 100 percent carbon-free electricity by 2045 (RCW 19.405.010).
Skagit County Comprehensive Plan Designation Consistency	The Project is consistent with the applicable goals and policies of the SCCP, as demonstrated in Section 3 of the Land Use Consistency Review (included as Attachment H to this ASC).
Skagit County Zoning District Compliance	The Project footprint in the Ag-NRL zone, approximately 16 acres, would occupy a nominal portion of Skagit County's agricultural lands (less than 0.001 percent; County 2016) and would comply with applicable zoning standards and requirements for "major utility developments." Section 4 of the Land Use Consistency Review, included as Attachment H of this ASC, demonstrates the Project's compliance with the applicable provisions of the SCC.
Skagit County Critical Areas	The Land Use Consistency Review (included as Attachment H to this ASC), Critical Areas Report (included as Attachment J to this ASC), and Parts 4.A, 4.C, 4.E, 4.G, 4.H, and 4.I of the ASC demonstrate that the Project would comply with Skagit County's applicable critical area regulations.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☒ No	☐ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
N/A	N/A	N/A

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.P.1. Noise

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Operational and Construction Noise Analysis, Goldeneye Energy Storage Project (Attachment O)	April 9, 2024	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Regulatory	In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 A-weighted decibels (dBA) energy equivalent level (L_{eq}) over an 8-hour period when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels. WAC 173-60-40 identifies "maximum permissible environmental noise levels" that vary with time of day, the "class" of the land use on which the noise is being produced, and the class of the land use that receives the noise being produced. For Environmental Designation for Noise Abatement (EDNA) Class A receiving zones that represent the off-site residential land uses surrounding the EDNA Class C industrial zone that exemplifies the operating Project equipment (post-construction), the exterior noise thresholds are 60 dBA hourly L_{eq} during daytime hours and 50 dBA L_{eq} during nighttime hours (10 p.m. to 7 a.m.). For EDNA Class C receiving zones, when the source is from EDNA Class C, the daytime and nighttime noise limit will be 70 dBA hourly L_{eq}. WAC 173-60-50(3)(a) specifically exempts construction noise during daytime hours from these exterior noise limits.

Existing Sound Setting	Although a baseline outdoor ambient sound level survey is not needed for the Project to demonstrate compliance with Skagit County (and WAC) noise requirements, FTA guidance offers two optional methods for coarsely estimating the pre-existing background sound environment of the Project vicinity: population density and proximity to major roadway or rail routes. With the proposed Project located in an area of Skagit County that appears to have a population density ranging from 100–300 persons per square mile, FTA guidance estimates that the daytime, evening, and nighttime energy-equivalent sound levels (L_{eq}) will likely be a minimum of 40 dBA, 35 dBA, and 30 dBA, respectively. Other local sound emission sources such as agricultural activities to the northeast of the site, audible corona from nearby electrical transmission lines, and transformer operation from the Sedro-Woolley Substation to the southwest will likely increase these estimated L_{eq} values depending on occurrence, duration, and magnitude, and thus potentially affect the sound levels heard by existing off-site receptors (e.g., residences) in the vicinity of the proposed Project site.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Construction	As detailed in Attachment O, aggregate acoustic emissions for seven sequential phases (i.e., groupings of heavy mobile and stationary equipment for a common activity or purpose) of Project construction were analyzed with a Federal Highway Administration Roadway Construction Noise Model emulator, which enabled predicted noise exposure levels at two nearest off-site residential receptors along Minkler Road. With a detailed equipment roster for each of the seven studied Project construction phases (site preparation, collector substation site preparation, grading, collector substation grading, battery container installation, collector substation installation, and decommissioning), predicted exposure levels at the two noise-sensitive locations are all less than the FTA 80 dBA 8-hour L_{eq} guidance-based threshold. However, these noise levels may be higher than varying magnitudes of the existing outdoor sound environment and under the right conditions could temporarily interfere with outdoor and indoor speech communication. The analysis presumes that all on-site construction equipment will be well-maintained and feature approved engine exhaust mufflers or similar factory-installed or authorized noise control and sound abatement features.

Operation	The noise study (Attachment O) presents modeling results for aggregate sound emission levels that are anticipated to be generated by on-site Project operating equipment. Operational sound levels were predicted using DataKustik's CadnaA (Computer Aided Noise Abatement), an industry-accepted commercially available software program based on International Organization for Standardization (ISO) 9613-2 algorithms and reference data for estimating outdoor sound propagation. The method described in this ISO standard conservatively calculates sound attenuation under weather conditions that are favorable for sound propagation, such as for downwind propagation (i.e., receptor is downwind of the sound emission source[s]). The Project's site layout of major noise-producing equipment and sound-occluding features was rendered in the CadnaA model, with input reference sound power levels representing individual battery containers, medium-voltage inverters, and the collector high-voltage transformer. Sound propagation calculation parameters include consideration of surface reflection, geometric divergence, and both air- and ground-based acoustical absorption. With proposed installation of 14-foot-tall and 16-foot-tall walls along extents of the Project perimeter, predicted hourly L_{eq} values at the eight nearest representative receptors (including both EDNA Class A and Class C receiving land uses) are expected to be compliant with Skagit County thresholds during the most stringent nighttime hours. Under such conditions and as modeled in the noise study, no further noise reduction needs associated with Project operation are identified.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
N/A	N/A

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
BMPs—Noise	WAC 173-60-050 exempts temporary construction noise from the state noise limits; however, BMPs will be implemented to reduce off-site construction noise impacts. Since construction equipment operates intermittently, and the types of machines in use at the Project change with the stage of construction, noise emitted during construction will be mobile and highly variable, making it challenging to control. Project construction will generally occur during the day, Monday through Friday. Furthermore, reasonable efforts will be made to minimize the impact of noise resulting from construction activities, including implementation of standard noise reduction measures listed below. Due to the infrequent nature of loud construction activities at the site, the limited hours of construction, anticipated	EFSEC

	compliance with FTA guidance thresholds for construction noise exposures, and the implementation of noise reduction measures, the temporary increase in noise due to construction is considered to be a less-than-significant impact. The construction management protocols will include the following noise reduction commitments to minimize noise impacts: • Maintain construction tools and equipment in good operating order according to manufacturers' specifications. • Limit use of major excavating and earthmoving machinery to daytime hours per WAC 173.60.050. • To the extent practicable, schedule construction activity during normal working hours on weekdays when higher sound levels are typically present and are found acceptable. Some limited activities, such as concrete pours for transformer pad foundations or the parking area if needed, will be required to occur continuously until completion. • Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks. • For construction devices that use internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible. • Limit possible evening shift work to low-noise activities such as welding, wire pulling, and other similar activities, together with appropriate material-handling equipment. • Use a complaint resolution procedure to address any noise complaints received from residents.	

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.P.2. Visual Resources

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
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- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Visual Impact Assessment Goldeneye Energy Storage Project (Attachment P)	Completed	Prepared by Dudek, environmental consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
General Description of the Area	The Project site consists of approximately 14.14 acres on the parcel designated as Parcel Identification Number P40030 in Skagit County, Washington. The Project site is located at 25084 Minkler Road, 0.4 mile northeast of the intersection with Fruitdale Road. The Project will interconnect into the PSE Sedro-Woolley Substation (i.e., point of interconnection), which lies adjacent and to the southwest.
Visual Setting	As described in the Visual Impact Assessment (Attachment P), the proposed Project site is located on privately owned land in unincorporated Skagit County, Washington. The general setting of the Project site and surrounding area is characterized by agricultural land with mostly scattered residential development to the east and southeast. Hansen Creek and its associated dense, vegetative corridor lie to the west of the Project site and its alignment extends to the northeast and south-southwest toward the Skagit River. Denser residential development occurs to the west of the Project site (and to the west of the Sedro-Woolley Substation).

	The Project site is situated in a low-lying valley flanked by undulating topography and hills to the north and south. Agricultural lands and scattered rural residences generally occur to the north and south of Minkler Road and west of Hansen Creek. In addition to the Sedro-Woolley Substation, denser development is generally located along Minkler Road and Railroad Avenue to the southwest of the Project site and generally consists of smaller and several larger lot residential properties. Agricultural lands and facilities generally characterize the local landscape to the south of Project site (in addition to Hansen Creek, an aboveground transmission corridor, and scattered to dense groupings of mature trees that define the local landscape). Skagit River flows from east to west and is located approximately 1 mile south of the Project site. Dominant colors in the immediate local area include the various greens and tans of vegetation, the general light greens of grass pastures on agricultural properties, and grays and lighter shade exteriors of residential structures. Minkler Road itself is characterized by a mostly grayish asphalt surface as well as some occasional signage and yellow and white striping. The majority of the Project Area consists of privately owned properties. The Project Area is bordered by Minkler Road, which is lined with multiple rural residences with various supporting residential, agriculture, and industrial structures, including the existing substation. Existing sources of artificial light in the Project site are limited to lighting associated with the existing residence located in the western portion of the site. Visible lighting sources include two fixtures installed atop the main vertical posts installed at the main property driveway off Minkler Road. Other sources of exterior lighting at the property include exterior-mounted fixtures on residential and accessory structures. In the surrounding area, existing lighting sources include exterior fixtures at scattered residential properties to the north and east (and at denser residentially developed areas to the west), and security lighting at the nearby Sedro-Woolley Substation. In addition to fixed sources, mobile sources of light originate from vehicles on Minkler Road. Potential sources of glare in the Project Area include the light sources described above, windows, and building materials including metal roofs or siding.
Visibility of the Site	The Visual Impact Assessment (Attachment P) determined that the Project site has a relatively small available viewshed due to the presence of tall and mature vegetation/trees located to the north and northwest of the site and trees located along the site's east, south, and west boundaries.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Views	Depending on the location on Minkler Road, views of the Project Area will shift from agricultural lands, rural residential structures, stands of mature trees and lines of tall blackberry thickets, local roadways, and existing substation and electrical transmission lines to energy storage and associated infrastructure. Views of these landscape components and land uses will be experienced primarily by motorists traveling on Minkler Road. Site preparation and, more specifically, the removal of perimeter trees along Minkler Road will temporarily provide for views to the interior of the Project site development areas (i.e., the Site Plan

	depicts a deliberate west and east BESS areas) whose surfaces will be slightly raised above existing on-site elevational contours to provide for sufficient site drainage. Over time, materials and structures will be brought to and constructed on site and these features will add verticality and transform the site to present a more distinct character of an energy facility. Attachment P identifies six key observation points (KOPs) along Minkler Road that were selected to assess the level of visual change resulting from the Project. Factors considered in the selection of viewpoints included site visibility, vantage point accessibility, and locations with sensitive viewers. Photographs were taken from the selected viewpoints to support the description of the existing visual setting and the evaluation of potential view and visual impacts associated with introduction of the proposed Project. Utilized by the Visual Impact Assessment, the Bureau of Land Management (BLM) contrast rating system (BLM 1986) uses criteria to evaluate the degree of visual contrast (i.e., none, weak, moderate, and strong) and objectively measures potential changes to the visual environment. The BLM's contrast rating system is summarized in Section 2.1.1 of Attachment P. The Project will result in weak to moderate contrast with the surrounding landscape based on the addition of the Project's structural components. The removal of vegetation of various heights along the Project site will alter the existing visible scenic resources. However, with construction of perimeter screen walls and with introduction of landscaping which, over time, will present a tall form and wide form battery energy storage and electrical infrastructure will be mostly screened from public view. As shown in Appendix A of the Visual Impact Assessment (Attachment P of this ASC), the Project will introduce new visual elements into the local landscape. Though the Project will be visible from Minkler Road, public visibility beyond Minkler Road is limited and, as shown in visual simulations, battery energy storage and electrical infrastructure will be mostly blocked from public view along Minkler Road by perimeter walls with assistance from site landscaping. From Minkler Road, the local landscape will be visibly altered with perceptible contrasts at identified viewpoints ranging from weak to moderate. Specifically, proposed removal of deciduous trees and shrubs and installation of new site landscaping will constitute the most prominent and noticeable visual change introduced by the Project. Secondarily, existing structures located on the Project site including the single-story residence in the northwest corner of the site will be demolished/removed and the introduction of a tall perimeter wall will introduce continuous horizontal form not generally common to the surrounding area. Some views of the Project (in particular, those on Minkler Road in proximity to the site) will attract attention from motorists and be co-dominant in the landscape. Depending on proximity between Minkler Road motorists and the Project site, the Project will result in weak to moderate contrasts with elements of the existing landscape. See Attachment P for a detailed analysis of the KOPs, including representative visual simulations of how the Project may appear as viewed from various nearby locations on Minkler Road.
Light	The Project is not expected to create a substantial new source of nighttime lighting. The Project will provide limited nighttime directional lighting for site access and security purposes. Permanent motion-sensitive, directional security lights will be installed to provide adequate illumination around the collector electrical yard areas and points of ingress/egress. All lighting will be shielded and directed downward to

	minimize the potential for glare or spillover onto adjacent properties. Therefore, the Project will not introduce a significant source of light that will impact views in the area.
Glare	The Project will include BESS enclosures; power inverters and transformers; a collector electrical yard consisting of an open rack, air-insulated switch gear; and the main transformer. These components will generally be constructed of steel and include a light to dark gray finish to minimize glare. Security cameras will be installed on wood or metal poles (brown or gray finish) and, due to the limited volume of cameras (and height of support poles), security cameras will not generate substantial glare that could substantially impact daytime views for receptors in the surrounding area. Perimeter walls will not produce glare and chain-link fencing will generally be blocked from public view due to the presence of the perimeter wall and site landscaping. Therefore, the Project will not introduce a source of glare that will significantly impact motorists or residents in the area.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
N/A	N/A

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☒ No	☐ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
N/A	N/A	N/A

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.R. Traffic and Transportation

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
No studies are proposed for traffic and transportation at this time.			☒ No	☐ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Transportation Systems	The Project site lies directly adjacent to Minkler Road, which will provide primary access, as shown in Figure 2 in Attachment A. Existing utility access roads near the PSE Sedro-Woolley Substation would provide access to the gen-tie line and the Sedro-Woolley Substation, which is accessible from Minkler Road and Hoehn Road. Washington State Route 20 (SR 20) runs southwest to northeast in the Project vicinity and is located approximately 0.65 miles to the north of the Project site, providing regional access to the Project. No new roads will be required to provide access to the Project site. The nearest highway is Interstate 5 (I-5), which leads to Seattle, WA to the south and Bellingham, Washington, to the north. From I-5, Project traffic can reach the Project site by exiting at Exit 231 to North Burlington Boulevard, traveling south to SR 20, then continuing northeast to State Street. From State Street in Sedro-Woolley, Washington, traffic will continue east to Minkler Road, which then leads to access to the Project Area. The roads leading to the Project Area are all paved. There are four intersections along the anticipated Project traffic route. The intersection with Exit 231 and N Burlington Blvd is a four-leg roundabout. The intersection with N Burlington Blvd and SR 20 is signalized with four legs. The intersection of State Street and SR 20 is a four-leg, signalized intersection. The intersection of State Street and Minkler Road is a two-way stop-controlled intersection with continuous traffic on Minkler Road. The assessment provided in this section relies on WSDOT data for both pavement conditions via the WSDOT Corridor Sketch Summary Viewer (WSDOT 2024a) and the WSDOT Traffic Count Database System (TCDS) (WSDOT 2024b). In

addition, aerial and street-level imagery has been reviewed via Google Earth Pro (Google 2024). A summary of road conditions is as follows:

- **I-5:** The pavement along this portion of the route was approximately 55 percent in good or very good condition according to the Corridor Sketch Summary Viewer as of 2019. A review of Google Earth street-level imagery showed pavement that appeared to be in good condition as of May 2023 when the imagery was captured, with no visible cracking or deterioration.
- **N Burlington Blvd:** This route was not assessed in the Corridor Summary Sketch Viewer. A review of Google Earth street-level imagery showed pavement that appeared to be in fair condition as of May 2023 when the imagery was captured. Some minor longitudinal and alligator cracking was visible on the relevant section of the route, along with faded pavement and worn lane markings.
- **SR 20:** The pavement along this portion of the route was approximately 60 percent in good or very good condition according to the Corridor Sketch Summary Viewer as of 2019. A review of Google Earth street-level imagery showed pavement that appeared to be in fair to poor condition near Burlington as of May 2023, with pavement condition improving to good or very good approaching Sedro-Woolley.
- **State Street:** This route was not assessed in the Corridor Summary Sketch Viewer. A review of Google Earth street-level imagery showed pavement that appeared to be in fair condition as of May 2023 when the imagery was captured. Some moderate alligator cracking was visible on the relevant section of the route, along with faded pavement and worn lane markings. Some imagery was dated September 2015, however, and the areas of this roadway with more recent imagery appeared to have been resurfaced recently.
- **Minkler Road:** This route was not assessed in the Corridor Summary Sketch Viewer. A review of Google Earth street-level imagery showed pavement that appeared to be in good to very good condition as of October 2021 when the imagery was captured. The road appears to have been somewhat recently resurfaced in imagery, and very limited cracking is visible.

Traffic counts have not been collected in direct association with the Project. However, available data regarding average annual daily traffic (AADT) counts have been obtained from Skagit County Public Works' Regional Traffic Counts Map (SCOG 2014). Traffic counts from WSDOT's TCDS have been utilized where possible as well (WSDOT 2024b).

- I-5: 63,384 in 2023, as measured by WSDOT
- N Burlington Blvd: 10,255 in 2022, as measured by Skagit County
- SR 20: 18,198 in 2022, as measured by Skagit County
- State Street: 3,179 in 2022, as measured by Skagit County
- Minkler Road: 2,220 in 2022, as measured by Skagit County

WSDOT generically classifies state highways in rural areas with a level of service (LOS) C as acceptable, indicating speeds near free flow but with restricted freedom to maneuver. Site-specific LOS information for the state routes

	near the Project have not been developed by WSDOT. However, it is anticipated that the actual level of service in the vicinity of the Project is closer to LOS B or A with free flow of traffic most of the time. **References:** Google. 2024. Street and Aerial Imagery via Google Earth Pro. Skagit County, Washington. Accessed May 22, 2024. SCOG (Skagit Council of Governments). 2024. Skagit Region Traffic Counts. Available online at: https://skagitcog.maps.arcgis.com/apps/webappviewer/index.html?id=c27c3004dd904c9793a4b98fce99b08f&extent=-13699641.5568%2C6120663.0088%2C-13498612.1724%2C6248924.3423%2C102100. Accessed May 22, 2024. WSDOT (Washington State Department of Transportation). 2024a. Corridor Sketch Summary Viewer. Available online at: https://www.arcgis.com/apps/View/index.html?appid=fc716ce9593943198c491c383fc1c009. Accessed May 20, 2024. WSDOT. 2024b.Traffic Count Database System. Available online at: https://wsdot.public.ms2soft.com/tcds/tsearch.asp?loc=Wsdot&mod=TCDS. Accessed May 21, 2024.
Waterborne, Air, and Rail Traffic	There are no shipping ports in proximity to the Project site. The nearest ports most likely to receive BESS equipment that would then be transported via truck to the Project site are the Port of Bellingham and the Port of Seattle. The Port of Bellingham is approximately 29 miles driving distance, and the Port of Seattle is approximately 75 miles driving distance. Air transportation is not anticipated for use in Project construction or operation. The nearest rail line to the Project is an abandoned rail line owned by Burlington Northern Sante Fe that runs adjacent to SR 20, north of the Project site. Rail transportation is not anticipated for use in Project construction or operation.
Public and Pedestrian Traffic	The traffic access route consists of interstate highways and rural state routes that are not in areas associated with public transit, pedestrian demand, or pedestrian-oriented land use.
Parking	No designated parking areas are currently present at the Project location.
Movement of People or Goods	The existing conditions related to the movement of people and goods near the Project is described above, under “Transportation Systems,” “Waterborne, Air, and Rail Traffic,” and “Public and Pedestrian Traffic.”
Transportation Hazards	Given the mountainous terrain along some of the transportation routes, steep grades and winding sections of roads are occasionally present along the access routes. Inclement weather such as snow and icy conditions may also contribute to hazards on the access route. Also, some parts of the access routes pass through smaller towns, such as Sedro-Woolley and Burlington, so there will be more local traffic in these areas and thus more potential for traffic conflicts.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Transportation Systems	**Improvements** There are limited improvements planned to the existing transportation infrastructure. The Project includes the installation of a water line underground along Minkler Road that would temporarily reduce the quality of access to the roadway, but upon completion the roadway would be returned to its original condition. The three access driveways to be constructed for the Project would be private and not provide any new travel routes for area residents. The Applicant will obtain County Right-of-Way Access Permits for all work planned in the right-of-way based on the final design. **Construction** During the estimated 14-month construction period, Project construction would peak at 250 one-way vehicle trips (i.e., 125 round trips) with an average of 112 one-way vehicle trips (i.e., 56 round trips) per day. Peak traffic numbers would occur over a 3-month period, with numbers tapering up and down before and after the Project's construction. The primary source of construction traffic would be worker commutes to the Project, originating from nearby communities and the Seattle metro area. The trip estimate is based on the Project's estimated peak and average workforces, with a carpool factor of zero (to assume worst-case scenario), and an average of 5 heavy trucks per day (peak of 45). Most of these average trips are for materials and equipment deliveries; however, during peak construction, approximately 40 dump trucks will be traveling to and from the site per day. It is likely that some carpooling will occur for workers, which would potentially reduce the trips generated by worker commutes. Construction traffic would include heavy-duty trucks, such as semi-trailer dump trucks and 40-foot container trucks, that would be carrying gravel and other materials required to construct new access driveways and transport cut and fill quantities as necessary for the grading of the site. These heavy-duty trucks would also provide concrete for foundations and materials for the BESS units themselves. A water line will run to the Project site to serve all water needs at the site, so it has been assumed that no water trucks will be necessary on site. These truck delivery trips are expected to occur during off-peak times throughout the workday. All truck deliveries are assumed to come from the south of the Project along I-5 (in the direction of the Port of Seattle), and then along SR 20. It is also assumed that construction workers will drive passenger cars or pick-up trucks to and from the Project site. During the 14-month construction period, the addition of construction traffic to I-5 would increase from 62,384 to 62,494 trips per day. This results in a 0.2 percent increase in AADT. At peak construction, there would be a 0.4 percent increase in AADT. On N Burlington Avenue, traffic would increase on average from 10,255 to 10,367 trips per day. This results in a 1.1 percent increase in AADT. At peak, traffic would increase by 2.4 percent. SR 20 will see a similarly negligible increase in traffic as I-5, increasing from 18,198 to 18,310 trips per day on average. This results in a 0.6 percent increase in AADT on average, and a 1.4 percent increase in traffic at peak construction. State Street will see an increase in traffic of 3.5 percent on average, increasing from 3,179 to 3,291 trips per day. At peak, construction traffic would cause a 7.9 percent increase in traffic. Finally, Minkler Road would increase from 2,228 to 2,340 trips per day, resulting in an average increase in traffic of 5 percent. At peak, this would result in a 11.2 percent increase in traffic. Given the currently uncongested nature of these roadways, the temporary increase in traffic counts is not expected to cause a significant impact to traffic flow. The increase in traffic on I-5 is so small that it will likely be imperceptible. Minkler Road may have a noticeable

	increase in traffic as commuting workers arrive and depart at peak commuting times, but as the increase is still small during most of construction, this impact is not likely to cause significant delays. **Operations** Operations traffic would be negligible since there will be four or fewer permanent employees, and they will only be on site once or twice a month as the BESS facility will be monitored remotely. The limited number of daily trips anticipated during Project operations would be negligible relative to current and projected LOS.
Waterborne, Air, and Rail Traffic	No changes will occur to waterborne traffic as a result of Project construction or operations because the Port of Seattle is of sufficient size to accommodate any BESS equipment that may be shipped to the Project. No changes will occur to rail or air traffic as a result of Project construction or operation because Construction and operation of the Project will not use these modes of transportation.
Public and Pedestrian Traffic	No changes will occur to the routing of public transit or the use of pedestrian and bike routes as a result of Project construction or operations. Also, no recreational pedestrian and bike routes are located close to the Project site.
Parking	During construction, workers would park in designated areas of the construction site, off public roads. Construction would not adversely affect the availability of parking for other users because no parking is currently available. Parking needs during operations would be limited to occasional use by up to four employees at the site. The Project will have a gravel parking area to accommodate these employees. Because the gravel parking area is internal to the Project Area, no vehicular backing up or maneuvering would occur within a public right-of-way.
Movement of People or Goods	Improvements required for the three proposed Project access driveways and for the installation of a water line along Minkler Road will temporarily impede traffic along Minkler Road. Therefore, a Traffic Control Plan will be prepared for approval with Skagit County. Post-construction, Project operations will not affect the movement of people or goods within or surrounding the Project Area.
Transportation Hazards	By complying with local, state, or federal requirements related to traffic and transportation, the Project will not restrict vehicular use or increase local safety hazards. Furthermore, Project construction routes were chosen to minimize the use of urban roads to the extent possible. The Applicant will obtain oversize and overweight haul permits in compliance with WSDOT and Skagit County requirements to safely haul equipment on highways and county roads, if any oversize or overweight loads are anticipated. The applicant will also obtain applicable permits from WSDOT and Skagit County for access to public road right-of-way. A Traffic Control Plan will be prepared in coordination with WSDOT and Skagit County's Public Works Department to mitigate transportation hazards during the construction of Process accesses and the underground water line along Minkler Road. For these reasons, the Project will not result in significant transportation hazards or impacts to traffic safety.

C.2. Changes to the Proposal from the Existing Condition		
Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes
Topical area/issue	Changes	
N/A	N/A	

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
WSDOT Oversize and Overweight Permit	A permit will be obtained for heavy or oversized loads in accordance with WSDOT regulations including RCW 46.44 and WAC 468-38.	WSDOT
Skagit County Right of Way Access Permit	Based on final Project design, the Applicant will obtain right-of-way access permits in accordance with County Standards for construction of an underground water line along Minkler Road as well as for construction of the three access driveways.	Skagit County Public Works Department
Traffic Control Plan	A Traffic Control Plan will be prepared in consultation with Skagit County using the Skagit County Road Standards for traffic management during the construction of Project access driveways and installation of an underground water line along Minkler Road.	Skagit County Public Works Department

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.S. Public Services and Facilities

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Fire Protection Plan (Attachment N)	April 29, 2024	POWER Engineers, consultant for the Applicant	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
General	Based on the Part 3 analysis, the Project will not significantly adversely affect the use of public services and facilities during construction or operation. However, given public concern around potential fire risks associated with BESS facilities, the following Part 4 analysis is being provided.
Fire Protection	The Project has frontage on Minkler Road, a paved road, and is located within the Skagit County Fire Protection District 8. There are multiple fire agencies and department locations in the vicinity of the Project. These include the Sedro-Woolley Fire Department and Skagit County Fire Protection Districts 6, 8, and 16. The two Sedro-Woolley Fire Department locations are located within 3 miles driving distance of the Project, while the two Skagit County Fire Protection District 8 locations are within 9 miles driving distance of the Project. There are adequate fire departments in the vicinity and direct access from the main road. There is an existing approach onto Minkler Road from the Project site serving existing buildings. These buildings will be demolished and new access points will be established.
Risk of Fire or Explosion	The Project Area is primarily undeveloped and currently includes pasture fields, with a small section of scrub/shrub habitat present near the southeastern corner. Since the 1970s, the Project Area has been an open field. The Project Area is mostly flat, though it contains areas of wetlands and frequently flooded areas; note that Project infrastructure will be elevated above the flood depth in accordance with the Site Grading Plan (Attachment B). Wildland grass fires are the greatest existing fire risk in the vicinity of the

	Project Area. There are four existing structures that are slightly within and adjacent to the Project Area. A natural gas pipeline is also located immediately northeast of the Project Area. Currently, there are no known hazardous materials stored onsite. At the time of writing this ASC (June 2024), there are no active fire related incidents in the vicinity of the Project (InciWeb 2024). Additionally, there is no history of large fires within at least 20 miles of the Project Area within the past 40 years (WDNR 2024). A Fire Protection Plan (Appendix N) has been developed to minimize the risk of fire at the Project site. **References** InciWeb. 2022. Incident Information System. Batterman Rd. Participating agencies: National Wildfire Coordinating Group, U.S. Forest Service, U.S. Bureau of Land Management, U.S. Bureau of Indian Affairs, U.S. Fish and Wildlife Service, U.S. National Park Service, National Association of State Foresters, and U.S. Fire Administration. Available online at: https://inciweb.nwcg.gov/ WDNR (Washington Department of Natural Resource). 2024. Washington Large Fires 1973-2023 download link. Data updated March 8, 2024. Washington Department of Natural Resource GIS Open Data Available online at: https://data-wadnr.opendata.arcgis.com/documents/washingtonlarge-fires-1973-2024-download/about
Existing Infrastructure	**Structures** The four existing structures within the Project Area will be removed as part of a stream restoration project to be conducted as part of Project construction, as agreed upon with the landowner; they are located on the eastern portion of the Project site. See Attachment J for additional information about the restoration project. **Water Line** Water during construction and operations (including for the purposes of fire suppression) will be provided by an existing Skagit PUD water line in Minkler Road, which will be upgraded to supply a sufficient water volume for fire suppression for the operational facility. This water line is made of 4- to 6-inch-diameter asbestos concrete and PVC pipes and will be upgraded to 8-inch-diameter ductile iron to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. **Fire Hydrants** No fire hydrants are currently located at the Project site. **Natural Gas Pipeline** A natural gas pipeline was installed adjacent to the northernmost corner of the Project site between 1975 and 1981. The pipeline is owned by Northwest Pipeline, LLC and will not be disturbed by construction or operation of the Project.

	Other Infrastructure Adjacent properties outside of the Project Area are mainly rural residential and agricultural. The Project will interconnect with the existing PSE Sedro-Woolley Substation, located approximately 0.4 mile southwest of the Project site. Existing transmission lines cross through the Project Area. No other infrastructure is located within the Project Area.
Fire Protection Plans and Services	See Attachment N, Fire Protection Plan. Additionally, prior to construction, the Project will develop and maintain an Emergency Management Plan. Both plans will include BMPs for fire prevention. The Applicant will coordinate with the Sedro-Woolley Fire Department, Skagit County Fire Marshal, and Skagit County Emergency Management.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Site Access	Three new access points/driveways onto Minkler Road are proposed. No new or improved roads, other than internal access roads within the Project Area, will be required to provide access to the project site. The Project will be secured with an eight-foot-tall pre-cast concrete panel wall and gates to provide access inside the site, from the three new access points to be constructed off Minkler Road. The Project substation will be enclosed by chain link fence with three strands of barbed wire at the top, to prevent unauthorized access to high-voltage electrical equipment. Each gate will be equipped with a Knox lock or Knox box as directed by the Authority Having Jurisdiction (AHJ). The Project is divided into two development sections that are not connected by internal roads. The western section has one entrance from Minkler Road and includes a fire truck compliance turnaround at the end of the driveway. The eastern section has two entrances from Minkler Road and includes a perimeter driveway that does not require a turnaround.
Risk of Fire or Explosion	The Project could increase the risk of fire or explosion within the Project Area due to the addition of new ignition sources. As previously mentioned, the Applicant is proposing to use lithium-ion batteries for energy storage, which are flammable and require cooling systems (composed of ethylene glycol-based coolant and/or fans) to prevent overheating. The BESS will have its own integrated safety system to monitor battery performance, detect malfunctions, and implement response measures (such as notifying operators, depowering the system, or deploying fire suppression devices). See Part 4.M for additional information on the BMS. Operations staff will conduct inspections of the battery cells for damage. The modules will be setback from one another as required by WAC 51-54A-0322, to minimize the potential for fire propagating from one module to another or to surrounding areas. In this way, even in areas without access to water, modules can be safely installed with minimal risk of multiple modules burning down should a fire consume one unit. The design of the units will help ensure fire and explosion risk are low. The BESS is further described in Parts 1 and 2 of this Application. The BESS units will be designed to incorporate multiple layers of protection to avoid failures and risks of fire or spills and will comply with the applicable

	requirements of the National Electric Code, NFPA Standards, and Institute of Electrical and Electronics Engineers Standards. Petroleum contaminated soils have been identified on the PSE Sedro-Woolley Substation site (see Part 4.L) and it is possible that contaminated groundwater from the Harris Property has migrated towards Hansen Creek. Although it is unlikely that contamination has migrated into the Project Area, a Phase 2 ESA is being conducted to assess the potential for contaminated materials to be disturbed during Project construction. Grading, excavating, and filling will occur during construction of the Project. Approximately 67,000 cubic yards of fill material will be sourced from a local permitted supplier. Approximately 35,500 cubic yards of topsoil and subsoil will be excavated and hauled offsite. Soil will be tested prior to removal offsite to confirm no hazardous materials are present and will be disposed of as construction debris or soil fill at an approved facility. As described above, the Project Area is primarily undeveloped and currently includes pasture fields, with a small section of scrub/shrub habitat present. If a fire were to travel into the Project site, the existing vegetation may increase the risk of fire. Vegetation within the Project fence line will be managed throughout the life of the Project. Vegetation management will also establish and maintain fire breaks around the Project's fence line. Mechanical vegetation control such as mowing, trimming, and pruning will be the primary means for vegetation management. Mowing frequency is anticipated to be once per month during the growing season. Herbicides may be utilized for vegetation control; however, an effort will be made to minimize use and only apply biodegradable, EPA-registered, organic solutions that are non-toxic to wildlife and used in a manner that fully complies with all applicable laws and regulations.
Existing Infrastructure	**Structures** The four existing structures within the Project Area will be demolished as part of Project construction, as agreed upon with the landowner. **Water Line** The existing water line in Minkler Road will be upgraded to an 8-inch-diameter ductile iron pipe, to meet a 1,500 gallons-per-minute flow rate requirement for fire safety. In accordance with the Skagit PUD's policy, the Applicant will implement upgrades and then deed the line to the Skagit PUD. Permitting for water line upgrades is handled through Skagit County. Water supply will be sized for two hydrants simultaneous operation. The Applicant discloses this information here for informational purposes only. Upgrades and maintenance to the water line are not requested under this ASC. **Fire Hydrants** Multiple fire hydrants will be installed to serve the Project. These fire hydrants have been provided throughout the BESS for First Responders to provide water streams to surrounding equipment or structures. Hydrant hose nozzles shall be sized to deliver up to 250 gallons per minute per nozzle.

	Other Infrastructure The Project will introduce new subsurface infrastructures such as a 230-kV transmission line, which will connect to the existing PSE Sedro-Woolley Substation and transmission infrastructure. Proposed subsurface infrastructure will not contain hazardous materials nor pose significant fire risk. No changes will occur to existing transmission lines outside of the transmission line interconnection. The Applicant is coordinating with PSE regarding the proposed interconnection actions.
Fire Protection Plan	See Attachment N, Fire Protection Plan (April 29, 2024). **Hazard** The primary hazard associated with the BESS modules is the uncontrolled combustion of explosive gases from cell(s) in thermal runaway. Large fire caused by cells in thermal runaway is unlikely to occur because of protection measures that have been developed and installed to minimize this potential. This hazard is minimized through keeping the explosive concentrations of gas below an explosive level through active ventilation, gas detectors, fire suppression, and ground fault detection, all in real time. Voltage and temperature in each cell are monitored in real time by the Project's Remote Operations Center (ROC). This information will be provided to local first responders in a manner to be determined through direct discussions with the local fire response agencies. **Site Details** Each BESS unit is independent of the other units and are contained within enclosures rated for outdoor weather exposure. The Project's ROC monitors in real time all conditions down to each cell level (voltage and temperature) for performance. The Project's Alert Management System automatically initiates mitigation measures to address an alert condition within a cell/module if it occurs. **Safety** The primary emphasis for the plant Fire Protection System is containment and prevention of fire spreading to adjacent equipment and structures. First, the modules are designed to prevent any fires and then in the case of a fire, to isolate the fire. Second, fire hydrants shall be available throughout the Project site to facilitate First Responder access for directing water streams onto surrounding equipment or structures as needed. Each module has its own comprehensive package of explosion prevention, fire safety features (hydrogen gas detection, active HVAC, fireproof insulation, and optional clean agent fire suppression). The modules will be set back from one another the code-required distance, which prevents fire from propagating from one module to another or to surrounding areas. In this way, even in areas without access to water, modules can be safely installed without risk of multiple modules burning down should a fire consume one unit. All modules come standard with heat and smoke detectors that automatically trigger the Fire Safety System to take action and notify the local fire authority.

	Large-scale testing of equipment will be done to simulate complete failure of all active safety measures during an intentionally induced fire. Satisfactory results will be provided during Building Permit review that show fire does not propagate from one BESS unit to another and that explosion risk in adjacent units exposed to the fire is effectively mitigated. The First Responders HMI shall be installed outside the Control Enclosure on the south end of Entrance No. 2 in the East BESS Group to provide a safe space for assessing the fire risk and strategy development. Prior to receiving a Certificate of Occupancy, the Project will arrange a manufacturer-led safety training with the First Responder team, and then semi-annually after that date, or upon adoption of a new Fire Code, whichever is more frequent. **Fire Protection Design and System Components** For further details on the site design and system components that provide the comprehensive fire protection for the Project, please refer to the Fire Protection Plan included as Attachment N.
Emergency Management Plan	The Emergency Management Plan (developed prior to construction) will address worker health and safety, as well as fire prevention and control measures for construction and operation. Access roads will have a compacted gravel surface, with a permanent width of approximately 24 feet as well as the required clearance and turning radius needed for emergency response vehicles, in accordance with fire code. The final layout will be provided to the Skagit County Fire Marshal's Office and Sedro-Woolley Fire Department.

C.2. Changes to the Proposal from the Existing Condition

Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☒ No	☐ Yes

Topical area/issue	Changes
N/A	N/A

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Fire Protection Plan	See Attachment N, Fire Protection Plan. To minimize the risk of fire or explosions, the Project will implement BMPs. Typical BMPs will include, but are not limited to, the following: • Equip control building with fire extinguishers of pressurized water, dry chemical powder, or Carbon dioxide, as appropriate. • Use BESS equipment that is rated for containment and control of any internal fires without spreading to any adjacent equipment.	N/A

	• Install fire water service mains and hydrants at start of the project to ensure ability to respond to a fire incident immediately during construction or normal operations at any point on the BESS site. • Secure the site with perimeter fencing with controlled access on to the site by authorized personnel only. • Minimize vegetation on the site. Limit combustible materials to stormwater management facilities only. • Establish roads before accessing the site to minimize vehicle contact with grass. • Use diesel construction vehicles instead of gasoline vehicles, where feasible, to prevent potential ignition by catalytic converters. • Prohibit vehicles from idling in grassy areas. • Restrict the use of high temperature equipment in grassy areas. • Monitor wildfire activity during Project construction and operations and, if necessary, modify Project activities, change the schedule, cease construction operations, or remove equipment. • Install lightning protection masts to protect generators and other equipment. • Install fire protection equipment in accordance with Washington state fire code. • Notify the local fire district of construction plans and access to Project equipment. • Provide mutual assistance in the case of fire in or around the Project during construction. • Prevent and control potential fires inside the Project Area with trained staff who have 24-hour access to the site.	
Emergency Management Plan	Prior to Project construction and operations, the Applicant will develop an Emergency Management Plan to address worker health and safety, standards concerning potential release of hazardous materials, and fire prevention and control. This plan will provide safety guidelines and procedures for potential emergency-related incidents during the Project's construction, operation, and decommissioning phases. This includes coordination with emergency service providers and fire suppression measures associated with the Project. Specifically,	Skagit County Emergency Management, Skagit County Sheriff, Sedro-Woolley Fire Department, and Skagit County Fire Marshal

	the plan will be developed with input from, and in coordination with, the Skagit County Emergency Management, Skagit County Sheriff, and Skagit County Fire Marshal. Applicable laws/codes include: • WAC 463-60-352 (2 through 4), which addresses fire and explosion, hazardous materials release, and safety standards compliance. • WAC 463-60-352(6), which describes emergency plans to ensure public safety and environmental protection. • 49 CFR §173.185m, which regulates the transportation of lithium-ion batteries. • 49 CFR §173.159, which regulates the transportation of lead-acid batteries. • International Fire Code	
Commissioning Plan	A commissioning plan will be developed to document procedures, including water supply, flow requirements, fire suppression, alarms, response guidelines, and training requirements.	
Building Permits	Project design and engineering will adhere to the applicable requirements of the National Electric Code, NFPA Standards, and Institute of Electrical and Electronics Engineers Standards. The Project will comply with the current codes at the time of construction, demonstrating compliance with WAC 463-62-020.	Skagit County Building Division, Skagit County Fire District, and Washington State Building Code Council
BESS Design	The BESS will contain a fire suppression and detection system in accordance with fire code and NFPA, specifically NFPA 855 "Standard for the Installation of Stationary Energy Storage Systems." The system will include monitoring equipment and alarm systems with remote shut-off capabilities.	NFPA

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
N/A	N/A

Environment Element Number and Name	4.U. Archaeological and Historical Resources

- As you complete this section, you do not need to repeat relevant information previously provided in another section, but reference that location and summarize what was provided.
- You can provide all the information requested in A. through E. below in a study or report, but should provide the information using this overall organization.
- All of these questions apply to all phases of the proposal (e.g. Construction, Operation, and Decommissioning/Reclamation).
- Information in this section should be related to the issue or topics that resulted in a "'Yes" or "Maybe" answer in Part 3.

A. Studies

Describe any studies that have already been conducted or will be conducted related to this topic and provide the expected timing for the studies to be completed.

Study Name	Est. Completion Date	Expert Agency Participation – Name, Title, and Involvement	Included with Submittal?	
Cultural Resources Inventory for the Goldeneye Energy Storage Project, Skagit County, Washington (Confidential Attachment E) DAHP Project # 2024-05-03828	June 2024	Prepared by Dudek, environmental consultant for the Applicant. The Washington State Department of Archaeology and Historic Preservation (DAHP), Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation to review.	☐ No	☒ Yes
Have all proposed studies for this topic been completed?			☐ No	☒ Yes

B. Existing Condition and Issues

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Existing Condition and Problems
Site Conditions from Cultural Resources Survey	The Project footprint, or area of potential direct impacts (APDI) where ground disturbances are planned, is 23 acres and includes the Project site (16.5 acres), gen-tie line, and two access road alignments. The archaeological investigations were focused on the Project APDI. The reconnaissance-level survey for historic built environment resources also included adjacent parcels, which, combined with the APDI, is the Project's recommended area of potential impacts (API). The API is a total of 160 acres. The cultural resources survey was conducted in February 2023, March 2024, and April 2024. It included a cultural resources literature review and DAHP records search within 1 mile of the API, tribal outreach to determine of tribal resources are known to be located within or near the API, an archaeological field survey within the APDI (consisting of a pedestrian survey and 60 shovel probes), and a built environment survey of the API. Responses to the outreach letters sent to the Tribes were limited; no information regarding tribal resources in or near the API was provided. Seven previously recorded archaeological resources (possible precontact site 45SK572, historic site 45SK571, historic site 45SK592, historic cemetery 45SK397, historic

	site 45SK651, historic isolate 45SK314, and precontact site 45SK315) are located within 1 mile of the API; none of these previously recorded resources are located within the APDI. Four of the seven previously recorded archaeological resources—sites 45SK572, 45SK571, 45SK592, and 45SK397—are located between 0.2 mile and 0.44 mile from the APDI and will not be disturbed or impacted by the Project. The remaining three previously recorded archaeological resources—45SK651, 45SK314, and 45SK315—are located within 30 meters of the APDI, near the proposed access road from Hoehn Road north to the gen-tie line and to the east edge of the substation. While they are not located within the APDI and no Project-related activities are planned within the resource boundaries, they warrant additional consideration here due to their proximity to the planned access road corridor (AR2). Previously recorded historic site 45SK651 was determined not eligible for the National Register of Historic Places (NRHP)/not significant and, as such, is not a protected resource under Washington state law. Historic isolate 45SK314 and precontact site 45SK315 are unevaluated for listing in the NRHP and are protected resources under Washington state law. Archaeological pedestrian survey and subsurface testing were conducted at regular 20-meter intervals within the planned access road corridor (AR2) in the vicinities of previously recorded resources 45SK651, 45SK314, and 45SK315. No cultural materials were identified during the survey and subsurface testing near the previously recorded resources, and the resource boundaries were confirmed not to extend into the APDI. The Project, as designed, avoids all the previously recorded archaeological resources. One new historic archaeological site (temporary field ID 12655.18-01) was identified during the survey within a previously planned access road from Minkler Road on the north side of the substation. The boundaries of site 12655.18-01—a mid-to late-twentieth century agricultural equipment and industrial historic-period debris scatter—were delineated by a pedestrian survey to the north and south of the previously planned access road and by the excavation of shovel probes to the west and east within the previously planned access road corridor. It is recommended that the site be unevaluated for listing in the NRHP and is a protected resource under Washington state law. The previously planned access road was removed from the Project design following the identification of site 12655.18-01, and the site is no longer within the APDI and will be avoided by the Project. The API's reconnaissance-level historic built environment survey identified 22 historic built environment resources. DAHP recently determined that three of these resources were not eligible for the NRHP. Dudek identified 19 additional resources within the Project API. All 19 newly recorded resources that were surveyed and evaluated were recommended as not eligible for the NRHP. If EFSEC agrees and DAHP concurs, these resources will not be protected resources under Washington state law. A finding of no significant adverse impacts to cultural resources is recommended.

C. Changes to and from Existing Condition

C.1. Changes to the Existing Condition from the Proposal

Describe the existing condition for this topic, including any existing problems associated with the issue being discussed.

Topical area/issue	Changes
Disturbance of archaeological and historic property sites	This topical area/issue is also discussed in Section B above. Seven previously recorded archaeological resources (possible precontact site 45SK572, historic site 45SK571, historic site 45SK592, historic cemetery 45SK397, historic site 45SK651, historic isolate 45SK314, and precontact site 45SK315) are located within 1 mile of the API; none of these previously recorded resources are located within the APDI. Four of the seven previously recorded archaeological resources—sites 45SK572, 45SK571, 45SK592, and 45SK397—are located between 0.2 mile and 0.44 mile from the APDI and will not be disturbed or impacted by the Project. The remaining three previously recorded archaeological resources—45SK651, 45SK314, and 45SK315—are located within 30 meters of the APDI, near the proposed access road (AR2) from Hoehn Road north to the gen-tie line and to the east edge of the substation. The nearest Project-related ground disturbances are associated with driving vehicles and equipment from Hoehn Road to the gen-tie line along planned access road AR2, which avoids the boundaries of the previously recorded archaeological resources. Archaeological pedestrian survey and subsurface testing was conducted at regular 20-meter intervals within the planned access road corridor in the vicinities of the previously recorded resources, and no cultural materials were identified. Thus, the previously recorded archaeological resources do not extend into the APDI (they will be avoided) and will not be disturbed by the Project. The boundaries of site 12655.18-01—a mid-to late-twentieth century agricultural equipment and industrial historic-period debris scatter—were delineated by a pedestrian survey to the north and south of the previously planned access road and by the excavation of shovel probes to the west and east within the previously planned access road corridor. The site is recommended to be unevaluated for listing in the NRHP and is a protected resource under Washington state law. The previously planned access road was removed from the Project design following the identification of site 12655.18-01; the site is no longer within the APDI and will not be disturbed by the Project. No archaeological resources will be disturbed by the Project, as designed. The API's reconnaissance-level historic built environment survey identified 22 historic built environment resources. DAHP recently determined that 3 of these resources were not eligible for the NRHP. Dudek identified 19 additional resources within the Project API. All 19 newly recorded resources that were surveyed and evaluated were recommended as not eligible for the NRHP. If EFSEC agrees and DAHP concurs, they will not be protected resources under Washington state law. No Project-related disturbances are planned for the 22 historic built environment resources identified within the API. A finding of no significant impacts to cultural resources is recommended for the Project, as planned.

	If inadvertent discoveries of cultural resources or human remains are made during the Project's construction, maintenance, or decommissioning activities, all work within 30 meters (100 feet) of the find should be immediately halted until it can be assessed by a qualified, professional archaeologist and/or physical anthropologist, and the DAHP and consulting tribes agree for the Project's activities in the vicinity of the find be resumed, in accordance with protocols identified in the inadvertent discovery plan (IDP). A DAHP archaeological excavation permit is required by Washington state law prior to archaeological investigations or Project-related ground-disturbing activities within protected archaeological resources.
Avoidance of significant impacts on archaeological and historic resources	As discussed in the sections above, no archaeological and historic resources will be directly impacted (disturbed) by the Project, and because no NRHP-eligible or unevaluated historic resources were identified within the API, the Project will not result in significant direct, indirect, or cumulative impacts to archaeological and historic resources. A finding of no significant impacts to archaeological and historic resources is recommended for the Project.
Existing tribal hunting or fishing rights	The Project Area's extent consists of private land owned by non-tribal members. No existing tribal hunting or fishing is known to occur within the Project's API. Further tribal consultation may be needed to confirm the previous statement.
Existing tribal plant gathering	As stated above, the Project Area's extent consists of private land owned by non-tribal members. No existing tribal plant gathering is known to occur within the Project's API. Further tribal consultation may be needed to confirm the previous statement.

C.2. Changes to the Proposal from the Existing Condition		
Would the existing condition for this topic have the potential to affect the proposal now or in the future?	☐ No	☒ Yes

Topical area/issue	Changes
Avoidance of significant impacts on archaeological and historic resources	As planned, the Project avoids significant impacts on all previously recorded and newly identified archaeological and historic resources. The Applicant re-designed the previously planned access road (AR1) to avoid unevaluated archaeological site 12655.18-01 prior to this EFSEC application submittal. No Project-related ground disturbances will occur within site 12655.18-01. Additionally, the access road (AR2)—designed to provide access from Hoehn Road to the gen-tie line—avoids the boundaries of nearby previously recorded archaeological resources 45SK651, 45SK314, and 45SK315. A finding of no significant impacts on archaeological and historic resources is recommended for the Project, as planned. If inadvertent discoveries of cultural resources or human remains are made during the Project's construction, maintenance, or decommissioning activities, all work within 30 meters (100 feet) of the find should be immediately halted until it can be assessed by a qualified, professional archaeologist and/or physical anthropologist, and the DAHP and consulting Tribes agree for the Project's activities in the vicinity of the find be resumed, in accordance with protocols identified in the IDP. A DAHP archaeological excavation permit is required by Washington state law prior to archaeological investigations or Project-related ground-disturbing activities within protected archaeological resources.

	If avoidance of precontact resources or NRHP-listed or unevaluated/potentially eligible resources is infeasible, the Applicant will obtain a DAHP excavation permit and perform all necessary archaeological work to comply with state and federal regulations.

D. Proposed Commitments and Monitoring

Are you proposing any minimization or avoidance commitments, either required in rules or proposed for impacts?	☐ No	☒ Yes

Commitment	Applicable law and how well it addresses the impact	Expert Agency Participation
Avoidance of Protected Sites	No protected archaeological resources will be significantly impacted or disturbed by the Project. All seven previously recorded archaeological resources within 1 mile of the Project are located outside the APDI. The nearest protected archaeological resources—unevaluated site 12655.18-01, unevaluated isolate 45SK314, and unevaluated site 45SK315—are located within 30 meters of planned access road AR2. The construction crews will be instructed not to drive or conduct any Project-related activities outside of the planned access road, Project site, and gen-tie line. Archaeological monitoring may be necessary to ensure Project-related activities stay within planned access roads, the Project site, and the gen-tie line during construction. Fencing is not recommended as it will draw unnecessary attention to the locations of the protected archaeological resources. Should the Project design change to include potential disturbances in protected archaeological resources, additional archaeological work may be necessary to determine the significance of the resources and/or mitigate potential significant adverse impacts. A DAHP archaeological excavation permit is required by Washington state law prior to archaeological investigations or Project-related ground-disturbing activities within protected archaeological resources.	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation
Archaeological Excavation Permit	Washington state law requires a DAHP archaeological excavation permit before archaeological investigations or Project-related ground-disturbing activities within protected archaeological resources. Protected archaeological resources include unevaluated or NRHP-eligible historic-period archaeological resources and all precontact resources. Since the Project seeks to avoid all archaeological resources, a DAHP archaeological excavation permit will not be required. If an inadvertent discovery of an archaeological resource is made during the construction, maintenance, or decommissioning of the Project and a DAHP archaeological excavation permit is required, then the required permit will be applied for and obtained following the discovery.	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation
IDP	An IDP will be prepared for the facility prior to commencing Project-related construction, maintenance, or decommissioning activities. The IDP will describe protocols to be followed at the time of a cultural resource or human remains	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-

	discovery and include contact information for DAHP staff, the state's physical anthropologist, and all consulting parties, including tribes.	Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation
Continued Coordination with Tribes	Dudek initiated tribal consultation to assist the Applicant under the State Environmental Policy Act (SEPA) (see SEPA Checklist, Question 13c). Tribal consultation letters were submitted to appropriate tribes (listed in the "Expert Agency Participation" column) on February 9, 2024. Each Tribe will receive copies of Dudek's cultural resources study, *Cultural Resources Inventory Goldeneye Energy Storage Project, Skagit County, Washington,* and have the opportunity to review and/or express concerns regarding the Project as currently designed. Tribal consultation remains ongoing with interested Tribes during the permitting process to incorporate tribal input regarding the avoidance of potential impacts to cultural resources. This includes traditional use areas and other areas of significance to the Tribes, and to facilitate any response to inadvertent discoveries during Project-related construction.	The DAHP, Samish Indian Nation, Upper Skagit Indian Tribe, Tulalip Tribes of Washington, Swinomish Indian Tribal Community, Stillaguamish Tribe of Indians, Snoqualmie Indian Tribe, Sauk-Suiattle Indian Tribe, Lummi Nation, and Confederated Tribes of the Colville Reservation

Have all final proposed commitments been identified?	☐ No	☒ Yes

E. Effects on Other Environmental Elements Not Yet Discussed

Does any information provided for this topic affect other environmental elements (e.g. water, plants, animals, noise), that has not already been considered and discussed in this form?	☒ No	☐ Yes

Environmental Element	Additional changes or effects
Water, plants, and animals	Ongoing communication with interested Tribes regarding culturally significant natural resources (water, plants, and animals) should be conducted throughout the permitting process. Access to and protection of these resources within usual and accustomed areas within the Project Area should be assessed and maintained.