



Skagit Audubon Society

**P.O. Box 1101
Mount Vernon, WA 98273**

September 23, 2024

Energy Facility Siting Evaluation Council
P.O. Box 43172
621 Woodland Square Loop
Olympia, WA, 98504-3172
Attn: Goldeneye Energy Storage Project Public Comments

Submitted via email to comments@efsec.wa.gov.

Dear sir/madam:

Please accept the following comments from Skagit Audubon Society on the Goldeneye Battery Energy Storage System (BESS) proposed for a site just east of Sedro-Woolley in Skagit County. Skagit Audubon is the chapter of the National Audubon Society focused on Skagit County, Washington. Our 492 members are primarily residents of this county and share our organization's mission to conserve and restore natural ecosystems, focusing on birds, other wildlife and their habitats for the benefit of humanity and the earth's biological diversity. Some of our chapter's members have lived in Skagit County their entire lives while others have returned or relocated here. What brings us to calling this area "home" is the landscape and the variety and quality of habitat which supports such a diversity of birds and other wildlife.

National Audubon research has shown that climate change, even more than habitat loss, is the greatest threat to birds, just as it is a profound threat to human beings.¹ We strongly support the urgent need to reduce greenhouse gas emissions and, to that end, to rapidly transition away from burning fossil fuels. We therefore recognize the important role that battery energy storage systems play as we depend increasingly on wind and solar to produce electricity. As with those energy production facilities, it is essential to properly site BESSs in ways attentive to the particular environment and the need for resilience in the face of climate change.

Please accept the following comments further detailing our concerns related to the proposed facility.

1. The risk of fire at BESS facilities is small but real and poses significant hazards to the environment and to human health and safety.

Lithium-ion batteries at BESS facilities are subject to overheating to the point of igniting difficult-to-extinguish fires. These fires release highly toxic gases and pose significant risk of explosion. While it is true that the incidence of such accidents in proportion to the number of BESS facilities has significantly decreased, fires continue to occur. The most recent was this month in California on September 5th, not the first incident in that state.² While the chance of an accident is small, the consequences are dire. Fire at a BESS can burn for weeks during which fire departments must apply large quantities of water. Does the Minkler Road site proposed for the Goldeneye BESS in unincorporated Skagit County have

¹ [Survival by Degrees: 389 Bird Species on the Brink | Audubon](#)

² [BESS Failure Incident Database - EPRI Storage Wiki](#)

a water supply sufficient to deal with an industrial-scale lithium-ion battery fire? It is very doubtful that the fire district for the area has the personnel, training, or equipment needed. Will the owners of the BESS pay the full cost of ensuring that sufficient water, trained firefighters, and equipment are at the ready 24 hours a day for the lifetime of the Goldeneye BESS?

2. Building an energy facility in a floodplain detracts from climate resiliency.
Skagit County is undertaking the required ten-year update of its Comprehensive Plan. This update must include a newly required element addressing reduction of greenhouse gas emissions and climate resiliency. The large substation on Minkler Road adjacent to the site proposed for the Goldeneye BESS sits in the floodplain of Hansen Creek and the Skagit River. Hansen Creek is prone to flooding as is the Skagit. Atmospheric scientists tell us that climate change will increasingly bring irregular weather patterns and potentially more frequent and larger floods, including on the Skagit River, as we see happening many places around the world.³ Siting a major substation in the floodplain was likely a mistake which will need to be corrected if we are to adapt effectively to the changing climate. Building the BESS next to this substation in the floodplain will, in the long run, detract from climate resiliency rather than helping address the effects of the climate crisis.
3. Construction and operation of a BESS next to Hansen Creek risks damaging important salmon habitat.
As other commenters have noted, including the Skagit County Commissioners, Hansen Creek is an important spawning stream for multiple salmonid species, and the public has spent considerable financial resources restoring this habitat.⁴ During the first ten years after restoration of Hansen Creek where it flows through Northern State Recreation Area, Skagit Audubon carried out regular bird surveys in that area. Consequently, we know at first hand the richly diverse wildlife habitat along this creek. A spill at the Goldeneye BESS or a fire and the necessary actions to extinguish it would surely jeopardize Hansen Creek's important habitat qualities from the project site all the way to the Skagit River. It would also jeopardize the Skagit, Puget Sound's most important river for salmon reproduction as well as a primary source of domestic water for many thousands of people and of irrigation for Skagit farms.
4. The proximity of the BESS to a densely inhabited areas poses disruption and possible hazards to the nearby residents.
Although Skagit Audubon's principal focus is on wildlife and wildlife habitat, we also care about the well-being of our fellow Skagit County residents and their ability to enjoy a safe and healthy environment. We understand that the fans required to cool the BESS lithium-ion batteries generate continuous loud noise. This would degrade the quality of life for nearby residents. Beyond that, the low-incidence but high-consequence nature of a fire at the Goldeneye BESS argues strongly for not building the facility near a residential area. Were a fire to occur, the venting of toxic gases and the fire itself would require immediate evacuation and potentially staying clear of the area for weeks as well as the possibility of losing homes to fire. There is likely no perfect location for a BESS in Skagit County but a

³ [Skagit Climate Science Consortium | Skagit Climate Science Consortium](#)

⁴ [Press Release \(skagitcounty.net\)](#)

commercial or industrial area away from residences, out of the flood plain, not taking agricultural land, and away from forest would seem the preferred alternative.

5. The uneven quality of the *Application for Site Certification*'s wildlife sections indicate need for a more careful and thorough approach to site analysis.

We note that the comments from Skagit County Planning and Development Services point to numerous and significant deficiencies in the project application.⁵ Focusing solely on the references to birdlife, we find that there is, appropriately, mention of the International Migratory Bird Treaty Act and the need to confine ground and vegetation disturbance to a time of year when birds are unlikely to be nesting. We also find reference to the likelihood that parts of the proposed site provide suitable habitat for bird nesting. On the other hand, in response to the Application form's question on whether birds are present at the site, the person completing the form marked, "No."⁶ It is safe to say that no site of this size and diversity in Skagit County has no birds. For over a decade, Skagit Audubon carried out surveys just up Hansen Creek north of State Route 20 and documented 100 avian species. The checking of the "No" box suggests that the biological evaluation of the site was neither thorough nor accurate. We lack the expertise to know if this shortfall also describes the statements about the salmon species for which Hansen Creek is an important spawning stream.

We appreciate your attention to our concerns and urge you to recommend to Governor Inslee that the Goldeneye project not be approved. We urge the company proposing this facility to look more carefully at sites in commercial and industrial areas away from sensitive habitat and away from residential development. The siting of battery facilities needs to contribute to rather than detract from climate resiliency. Thank you.

Sincerely,



Timothy Manns
Conservation Chair, for the Skagit Audubon Board

Cc: Governor Jay Inslee via [Send Gov. Inslee an e-message | Governor Jay Inslee \(wa.gov\)](#)

⁵ Skagit County Planning & Development Services, Jack Moore, August 13, 2024 ([CombinedComments.pdf \(wa.gov\)](#))

⁶ *Application for Site Certification*, p.46