

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background

1. Name of proposed project, if applicable:

Greenwater Battery Energy Storage System (BESS)

2. Name of applicant:

GREE bn, LLC, a subsidiary of BrightNight, LLC

3. Address and phone number of applicant and contact person:

Chris Wissel-Tyson
GREE bn, LLC
515 N Flagler Dr, Suite P-200
West Palm Beach, FL 33401
253-458-1248

4. Date checklist prepared:

April 8, 2024

5. Agency requesting checklist:

City of Sumner and Pierce County. City of Sumner is the lead SEPA agency.

6. Proposed timing or schedule (including phasing, if applicable):

Construction is planned to start in Q3 of 2024 and last until Q3 or Q4 of 2025.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No future additions or expansion are currently planned.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

- Existing Conditions Background Sound Survey and Noise Impact Assessment, Greenwater BESS, Sumner, WA (Hessler and Associates, Inc., in preparation)
- Geotechnical Report and Landslide Hazard Assessment (ANS Geo, in preparation)
- Level III Cultural Review (Requested by Puget Sound Energy [PSE], in preparation)
- Phase I Environmental Site Assessment, Greenwater Storage, 2111 and 2306 East Valley Highway East and 2005 Cottage Road East, Sumner, Pierce County, Washington (Completed, Terracon Consultants, October 7, 2022)
- Phase I Environmental Site Assessment, Greenwater Storage, 2005 Cottage Road East, 1705, 1808 to 1904, 2008, and 2111 East Valley Highway East, and 2120 Lakeland Hills Way, Sumner, Pierce, Washington. Completed, Terracon Consultants, Inc., January 23, 2024) *This Phase I ESA report is currently being updated to include parcel areas added to the project for the current gen-tie route, including portions of parcels 9520000101, 0520072002, 0520072001, and 9520000071.
- Phase I Environmental Site Assessment, Greenwater Storage Limited Site Assessment (Terracon Consultants, Inc., in preparation)
- Stormwater Management Plan (to be submitted with building permit application)
- Wetland Delineation/Critical Areas Report (Completed, AECOM, January 18, 2024)

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Two applications are pending with City of Sumner for the BESS site: (1) removal of the gymnasium and boiler room from the Dieringer School; (2) relocation of the RV long-term

storage site and part of the Peterson Brothers general contractor lot. Both applications were initiated by the property owner independent of the proposed Greenwater BESS project.

10. List any government approvals or permits that will be needed for your proposal, if known.

City of Sumner, Conditional Use Permit (for gen-tie)
City of Sumner, Boundary Line Adjustment (for BESS site)
City of Sumner, Design Review
City of Sumner, Building Permit
City of Sumner, Grading Permit (Site Development Permit)
City of Sumner, Right-of-Way Use Agreement
Pierce County, Site Development Permit
Washington State Department of Ecology, Construction Stormwater General Permit

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

GREE bn, LLC (BrightNight) is proposing to construct the 200-megawatt/800-megawatt hour Greenwater BESS Project on four contiguous tax parcels on the west side of East Valley Highway East in the City of Sumner. A generation-intertie (gen-tie) overhead electrical transmission line will connect the BESS to the PSE White River Substation east of East Valley Highway East in unincorporated Pierce County. See **Figure 1, Project Location**.

The 8-acre BESS will consist of a minimum of 150 modular energy units (BESS enclosures) in rows. The BESS enclosures will be placed next to one another and will accommodate access for operations and maintenance (O&M) and emergency services. Each BESS enclosure will be 20–40 feet long and 8.5–9.5 feet tall. The BESS enclosures will be connected to fully contained medium-voltage step-up transformers along the rows, which will be connected via underground electrical cables to a small on-site substation. The on-site substation will increase voltage from 34.5 kilovolts (kV) to 230 kV, to match PSE’s White River Substation voltage. The on-site substation will be approximately $\frac{3}{4}$ acres in size and will include a main power transformer, six to nine circuit breakers (depending on the BESS technology selected), metering, protection, and SCADA equipment. Secondary containment will be installed around the on-site substation transformer. An 8-foot-tall chain link perimeter security fence will be installed around the entire BESS facility. An 8-foot tall chain link fence with 2-feet of barbed wire will be installed around the on-site substation, separating it from the remainder of the BESS facility. Access to the BESS facility will be via an existing access from East Valley Highway East in the southern portion of the site and a new access to the highway in the northern portion of the site. Refer to Site Plan in Attachment A.

The gen-tie referred to above will extend from the on-site substation south then east across East Valley Highway East to PSE’s White River substation (Figure 1). The proposed gen-tie will consist of three transmission line cables and a tension cable mounted on steel single-pole vertical-aligned transmission towers. Towers will range from 65 feet to 125 feet tall and will be equipped with insulators and wire conductors designed to carry 230 kV.

Construction of the BESS and on-site substation will require demolition/removal of existing structures, site preparation, surfacing and concrete work, and installation of the BESS enclosures, access platforms, and substation. Construction of the gen-tie will require earthwork and site

preparation (including vegetation clearing, excavation, fill, and grading), foundation construction, transmission line structure construction, and wire-stringing operations.

BrightNight anticipates employing two permanent O&M staff for the project. O&M staff will visit the site daily, conducting daily operations and maintenance activities. The BESS site will include six parking spaces for O&M staff, a 60-foot office trailer for O&M staff use while on-site, porta-potties for staff use, and a materials laydown area. However, the BESS site will not include an on-site office/control room. An office/control room for the project will be located off-site in a nearby location still to be determined. It is anticipated that every 5 years, BrightNight will conduct a large maintenance event that will involve a small team of staff to perform upgrades to the BESS facility over a period of 1–2 months.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposed BESS will be located on four contiguous tax parcels (9520000174, 9520000173, 9520000168, and 9520000152) in the City of Sumner, Washington. The primary site address for the BESS is 1808 East Valley Highway East, Sumner, Washington. The proposed gen-tie will extend from the BESS substation south across tax parcels 9520000152, 9520000143, 9520000121, and 9520000101, then east across East Valley Highway East, then east across tax parcels 0520072002, 0520072001, and 9520000071, and then across 0520072004, 0520071007, and 0520071008 to the PSE White River Substation in unincorporated Pierce County, Washington (**Figure 1**).

The proposed project is in Quarter Sections 1 and 2 of Section 07, Township 20 North, Range 05 East.

B. Environmental Elements

1. Earth

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

The proposed BESS site on the west side of East Valley Highway East is relatively flat. The proposed gen-tie on the east side of the highway consists of steep slopes.

b. What is the steepest slope on the site (approximate percent slope)?

The steepest slope on the project site is on the east side of East Valley Highway East and is approximately 75% grade.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Native soils on and adjacent to the BESS site in the relatively flat western portion of the project site are mapped by the Natural Resources Conservation Service (NRCS) as Shalcar muck (Map Unit 8A) and Semiahmoo muck (Map Unit 37A). These soils are both classified by the NRCS as farmland of statewide importance. However, the BESS site is covered with several feet of fill material and is not classified as agricultural land of long-term significance by City of Sumner.

Soils along the proposed gen-tie alignment just east of East Valley Highway East are mapped as Xerochrepts, 45–70 percent slopes (Map Unit 47F). Xerochrepts are classified as not prime farmland. Soils along the central portion of the proposed gen-tie are mapped as Alderwood gravelly sandy loam, 15–30 percent slopes (Map Unit 1C). This map unit is farmland of statewide importance. Soils along the eastern portion of the gen-tie alignment near the PSE substation are mapped as Alderwood gravelly sandy loam, 8–15 percent slopes (Map Unit 1D). This map unit is classified as prime farmland if irrigated. However, lands along the gen-tie alignment are not classified as agricultural land of long-term significance by City of Sumner or Pierce County.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

BESS: While no surface indications or history of unstable soils are present, the City of Sumner Seismic Hazard Area Map indicates that the BESS site is in a Liquefaction Hazard Area. The western portion of the site is classified as a High Liquefaction Hazard Area, while the eastern portion of the site is classified as High Dynamic Settlement Area.

Gen-Tie: The City of Sumner Landslide and Erosion Hazard Map indicates that the proposed gen-tie alignment crosses Type 1 (25% slopes or greater) and Type 2 (15% slopes or greater–less than 25% slopes) steep slopes on tax parcels 0520072002, 9520000110, and 0520072004 in the City of Sumner. The Pierce County Landslide Hazard Area public GIS data indicate that the proposed gen-tie alignment crosses landslide hazard areas on tax parcels 0520071007 and 0520071008 in unincorporated Pierce County.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

BESS: The majority of the 8-acre BESS site will be leveled and re-surfaced to ensure a stable base, except that the existing pavement on the City's easement for the public well will remain intact. The site will be resurfaced with gravel, crushed stone, and road base. The two access points to the BESS site will be paved. All major site equipment, including the BESS enclosures, medium-voltage transformers, and substation equipment, will be on concrete slab foundations.

Gen-Tie: For each transmission tower installed along the proposed gen-tie alignment, the ground will be excavated to approximately 7 feet below ground surface, and the ground area of the base of the structure will be graded.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Soils exposed during construction could be subject to erosion. Erosion potential will be minimized during site preparation, construction, and long-term site use through implementation of best management practices (BMPs).

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

BESS: The 8-acre BESS site is currently 100% covered with impervious surfaces, including gravel, pavement, and structures. The site will continue to be 100% covered with existing and replaced impervious surfaces after project construction.

Gen-Tie: About 0.2% (0.1 acre) of the gen-tie easement will be covered with impervious surfaces after project construction. New impervious surfaces from the project are limited to concrete foundations for the proposed towers.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Geotechnical studies will be prepared for work in steep slope areas and will identify design and mitigation measures to control erosion on steep slopes. Recommended mitigation measures will be implemented, as well as general construction BMPs that include, but are not limited to, marking clearing limits, installing temporary erosion and sediment control (TESC) measures (e.g., straw wattles, silt fences), and stabilizing soils during and after completion of the work. All structures will be designed and constructed according to strict engineering standards to maintain slope stability and infrastructure safety.

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Construction activities and equipment will likely generate minor amounts of dust and vehicle exhaust. Air emissions during construction will be intermittent and short-term, lasting up to a few days, and are not expected to result in air quality impacts. The completed project will not generate any emissions to the air.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

There are no off-site sources of emissions or odors that have the potential to affect the proposed project.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

All construction vehicles and equipment will be properly maintained to minimize air emissions and turned off when not in use. BrightNight's construction contractor will implement dust control measures as necessary.

3. Water

- a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

BESS: AECOM conducted a wetland delineation for the proposed project on September 6–7 and November 30, 2023. No wetlands or other surface waters were observed on or immediately adjacent to the BESS site. A north–south running segment of the Union Pacific Railroad borders the BESS site to the west. The National Wetland Inventory (NWI) shows a seasonally flooded man-made drainage channel on the west side of the railroad embankment on tax parcel 0420014081 (refer to figures in the Wetland Delineation/Critical Areas Report). The NWI also shows several open water ponds and palustrine emergent wetlands farther west of the railroad; these are all greater than 200 feet from the BESS site and on the other side of the railroad embankment.

Proposed Gen-Tie Alignment: Washington Department of Natural Resources and Washington Department of Fish and Wildlife (WDFW) stream data and the City of Sumner wetland data show an intermittent non-fish-bearing stream and two wetlands north of the proposed gen-tie (refer to figures in the Wetland Delineation/Critical Areas Report). The stream (referred to as Stream B below) is mapped as starting in off-site tax parcel 05200072004 and flowing west (downhill) in a forest ravine through off-site tax parcel 9520000130 and the northwest corner of on-site tax parcels 9520000110 and 05200072002 to East Valley Highway East, then continuing south in a culvert to the Dieringer Flume canal. One of the City of Sumner–mapped wetlands is shown in the off-site parcels 05200072004 and 9520000130 in the ravine associated with this stream. This off-site wetland is approximately 300 feet north of the proposed gen-tie at its closet point. However, this off-site wetland was not verified in the field as part of the wetland delineation conducted for this project, as it is located on private land that is not part of the project site.

The second City of Sumner–mapped wetland is shown north of the eastern portion of the proposed gen-tie in tax parcels 0520071007 and 0520071008. Pierce County wetlands data also show an unconfirmed wetland north of the proposed gen-tie on tax parcel 0520071008. No wetlands were identified in the vicinity of the proposed gen-tie alignment in the eastern portion of the site during the wetland delineation conducted on September 6–7 and November 3, 2023.

AECOM delineated one stream (Stream A) and two wetlands (Wetlands A and B) in the vicinity of the proposed gen-tie on tax parcels 9520000110, 0520072002, and 9520000071. Stream A appears to be an intermittent stream that likely is dry part of the year. Stream A flows into the City of Sumner–mapped off-site stream (Stream B) just north of the project site at the highway. Stream B flows into a concrete box culvert at the road embankment. The culvert angles south and extends along the east side of the highway and discharges to the Dieringer Flume canal, which flows west to the White River.

Wetland A is an 0.11-acre palustrine forested wetland that lies at the bottom of a steep slope. Stream A also flows through a portion of the wetland. The dominant plants in the wetland include black cottonwood (*Populus trichocarpa*), alder (*Alnus rubra*), salmonberry (*Rubus spectabilis*), Himalayan blackberry (*Rubus armeniacus*), reed canarygrass (*Phalaris arundinacea*), lady fern (*Athyrium filix-femina*), and giant horsetail (*Equisetum telmateia*).

Wetland B is an 0.04-acre seasonally inundated and saturated palustrine wetland with scrub-shrub and emergent vegetation. The wetland is in a shallow depression between the highway and a steep slope. The woody vegetation community consists of black cottonwood and red alder saplings, Sitka willow (*Salix sitchensis*), Douglas spirea (*Spirea douglasii*), and Himalayan blackberry. Herbaceous vegetation includes common horsetail (*Equisetum arvense*), common velvetgrass (*Holcus lanatus*), fringed willowherb (*Epilobium ciliatum*), clover (*Trifolium* sp.), and creeping buttercup (*Ranunculus repens*).

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

The BESS site is within 200 feet of the seasonally flooded man-made drainage channel mapped in the NWI on the west side of the railroad. However, the drainage channel is isolated from the BESS site by the railroad embankment, and project construction and operation have no potential to impact the drainage.

The proposed gen-tie alignment will require work over Stream A and Wetland A associated with wire-stringing activities for the gen-tie. However, construction of the gen-tie towers will not require any work within 200 feet of the wetland. The nearest tower will be located approximately 300 feet from the wetland.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge material will be placed in or removed from surface waters or wetlands.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

Surface water withdrawals or diversions will not be required for this project.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Based on review of Federal Emergency Management Agency Flood Insurance Rate Maps 53053C0352E and 53053C0351E, both effective March 7, 2017, the project site is not within a 100-year floodplain.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The project does not involve any discharges of waste materials to surface waters.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

Groundwater will not be withdrawn from a well for drinking water or other purposes.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

No waste material from the project will be discharged into the ground.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

BESS: Stormwater runoff from impervious surfaces on the proposed BESS site currently drains into private on-site catchbasins and flows through an in-ground stormwater control system, which either discharges directly to the Dieringer Flume canal to the south or connects to municipal stormwater pipes along the west side of East Valley Highway East, which also discharge to the canal.

Stormwater management for the proposed BESS facility will be designed in accordance with the 2019 Washington State Department of Ecology Stormwater Management Manual and Sumner Municipal Code 13.48 Stormwater Management Regulations. This will involve modifying and/or upgrading the existing site stormwater management facilities as required. A Stormwater Management Plan will be developed and submitted to City of Sumner for review and approval as part of the building permit and grading permit applications for the project.

Gen-Tie: Existing sources of runoff along the proposed gen-tie alignment are limited to existing gravel roadways and transmission tower foundations. Stormwater runoff sheet flows to adjacent areas and infiltrates on-site. No stormwater management facilities are present. New impervious surfaces associated with the proposed gen-tie alignment are limited to concrete foundations for the proposed project towers. These will not generate stormwater runoff requiring collection and disposal. Similar to existing conditions, stormwater runoff will sheet flow to adjacent areas and infiltrate on site.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

The facility will operate according to a Spill Prevention, Containment and Countermeasure (SPCC) Plan. The individual battery modules are fully sealed and stored in vertical racks within larger enclosures. The medium-voltage transformers are also fully sealed. Secondary containment will be installed around the fully sealed main power transformer at the on-site substation, which uses mineral oil.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

The project will not alter or otherwise affect drainage patterns in the vicinity of the site. Stormwater runoff from the proposed BESS site currently drains into on-site catchbasins and an in-ground stormwater control system, which discharges directly to the Dieringer Flume canal to the south or into the municipal stormwater system along East Valley Highway East, and then to the Dieringer Flume canal. Stormwater runoff from the proposed BESS facility will be collected and conveyed similarly to the same discharge location. A Stormwater Management Plan will be developed and submitted to City of Sumner for review and approval as part of the building permit and grading permit applications for the project.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

The project will have no direct impact to on- or off-site streams or wetlands. Construction BMPs will be implemented to minimize potential impacts to streams or wetlands from equipment operating in the vicinity during overhead conductor stringing activities. BMPs may include, but will not be limited to, conducting work during the dry season; marking clearing limits; installing TESC measures (e.g., straw wattles, silt fences); covering stockpiled spoils; controlling, treating, and discharging groundwater if encountered during construction at the BESS site, in accordance with applicable specifications; street cleaning; and stabilizing soils during and after completion of the work.

Potential impacts to water quality in the Dieringer Flume canal and downstream surface waters from stormwater runoff will be controlled via on-site stormwater management. Stormwater management for the proposed BESS facility will be designed in accordance with the 2019 Washington State Department of Ecology Stormwater Management Manual and Sumner Municipal Code 13.48 Stormwater Management Regulations. A Stormwater Management Plan will be developed and submitted to City of Sumner for review and approval as part of the building permit and grading permit applications for the project.

The project will have no impact on groundwater or drainage patterns. No measures to reduce or control impacts on these resources are needed.

4. Plants

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

BESS: Vegetation on the BESS/substation site is limited to sparse non-native invasive weeds, such as Canada thistle (*Cirsium arvense*), growing in gravel areas along the western edge of the project site. Any weeds present on the site at the time of construction will be removed.

Gen-Tie: Vegetation will be removed at the site of each transmission tower and along the proposed gen-tie alignment as necessary to adhere to industry clearance standards. Existing access roads will be maintained, and temporary access roads (if needed) will be installed along the length of the gen-tie route for construction, which will require vegetation removal.

c. List threatened and endangered species known to be on or near the site.

No threatened or endangered plant species are known to occur on or near the site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

BESS: A landscape plan will be developed to comply with City of Sumner requirements for screening the site from East Valley Highway East. The landscape plan will be submitted to the City for review and approval as part of the Design Review for the project. It is anticipated that landscaping will include small street trees and shrubs within an approximate 12-foot-wide berm along the front of the facility in front of the highway in areas that currently do not contain trees.

Gen-Tie: No landscaping is proposed for the proposed gen-tie alignment.

e. List all noxious weeds and invasive species known to be on or near the site.

The noxious weeds and invasive species identified below were observed on the project site during field investigations conducted on September 6–7 and November 30, 2023. The Washington State Weed Control Board noxious weed classification is provided for each species.

- Butterfly bush (*Buddleja davidii*) – Class B
- Canada thistle – Class C
- Common tansy (*Tanacetum vulgare*) – Class C
- Common Saint John’s wort (*Hypericum perforatum*) – Class C
- English ivy (*Hedera helix*) – Class C
- English hawthorn (*Crataegus monogyna*) – Class C
- Himalayan blackberry – Class C
- Queen Anne’s lace (*Daucus carota*) – Class C
- Reed canarygrass – Class C
- Scotch broom (*Cytisus scoparius*) – Class B
- Teasel (*Dipsacus fullonum*) – Class C

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:
mammals: deer, bear, elk, beaver, other: coyote
fish: bass, salmon, trout, herring, shellfish, other _____

b. List any threatened and endangered species known to be on or near the site.

The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system indicates that the following federally listed threatened or endangered species, or candidate species, may occur in the project area: North American wolverine (*Gulo gulo luscus*), marbled murrelet (*Brachyramphus marmoratus*), streaked horned lark (*Eremophila alpestris strigata*), yellow-billed cuckoo (*Coccyzus americanus*), monarch butterfly (*Danaus plexippus*), and Taylor’s checkerspot (*Euphydryas editha taylori*). A Habitat Assessment was initially prepared for the project area by Terracon Consultants in 2022. Information in the 2022 Terracon Habitat Assessment was re-reviewed and updated in the 2024 AECOM Wetland Delineation/Critical Areas Report (see Section 3.4.4 of the 2024 AECOM Wetland Delineation/Critical Areas Report). Suitable habitat for these species does not occur on or near the site.

The IPaC system also indicates that bull trout (*Salvelinus confluentus*), federally listed as threatened, may occur in the project area. Review of the WDFW Priority Habitat and Species (PHS), WDFW SalmonScape mapping, and USFWS StreamNet mapping indicates that bull trout occur in the White River to the east of the project site, but they are not documented in the Dieringer Flume canal south of the project site, which flows into the White River. Stream A, located on the project site on the east side of East Valley Highway East, is not mapped in these data sources, but the off-site Stream B that Stream A flows into is mapped in SalmonScape as a non-fish-bearing intermittent/ephemeral stream.

WDFW's PHS data and SalmonScape both indicate that coho salmon (*Oncorhynchus kisutch*), a federal candidate species, occurs in both the White River and in the Dieringer Flume canal.

c. Is the site part of a migration route? If so, explain.

The proposed project is within the Pacific Flyway, which stretches almost the entire width from the Pacific Ocean to the Cascade Range foothills.

d. Proposed measures to preserve or enhance wildlife, if any:

Potential impacts to wildlife are limited primarily to potential impacts from stormwater runoff discharges to fish in the Dieringer Flume canal. Stormwater management for the proposed BESS facility will be designed in accordance with the 2019 Washington State Department of Ecology Stormwater Management Manual and Sumner Municipal Code 13.48 Stormwater Management Regulations. A Stormwater Management Plan will be developed and submitted to City of Sumner for review and approval as part of the building permit and grading permit applications for the project.

e. List any invasive animal species known to be on or near the site.

No invasive animal species are known to be on or near the site.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The project will use electric energy to run the BESS and on-site substation.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The project will not affect the potential use of solar energy by adjacent properties. Construction of the BESS will require structures that are at maximum 9.5 feet in height and therefore will not increase shade on adjacent properties.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

The Greenwater BESS project is specifically designed to provide clean energy capacity to PSE customers and the surrounding region. Projects like the Greenwater BESS project are necessary

to maintain system reliability as PSE transitions from traditional coal power plants to more intermittent renewable technologies like wind and solar. This project will also provide improved energy security to the local area by providing large-scale energy storage that can back up the grid when large transmission lines go down.

7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

- 1) Describe any known or possible contamination at the site from present or past uses.

BESS: Two Phase I Environmental Site Assessments (ESAs) have been conducted for properties included in the current proposed project site (see Section A.8). Terracon Consultants conducted a Phase I ESA in October 2022 that included tax parcel 952000007. The 2022 Phase I ESA indicates there were leaking underground storage tanks (USTs) used for gasoline, diesel, and heating oil storage that were associated with former garage, shed, and carpenter building locations in the southern portion of this property (see Exhibit 2 of the 2022 Terracon Phase I ESA). They were removed in 1995. Based on 2008 cleanup reports, gasoline-, diesel- and oil-range total petroleum hydrocarbons and metals were identified in site soil and groundwater at concentrations exceeding their respective Washington State Model Toxics Control Act Method A cleanup levels. Metals associated with sandblasting were also detected in the soil. As remediation, 2,200 cubic yards of contaminated soil was removed to a maximum depth of 6 feet below ground surface, but subsequent testing was inadequate for confirming that no residual soil or groundwater contamination was present across the parcel in question. The report indicates there is potential for residual metal and petroleum impacts to soil and groundwater in the remediated area. The report recommended that additional site investigations be completed if any ground disturbance would occur in the vicinity of the former UST area, which is located in a currently grassy area on the south side of the Dieringer Powerhouse parking lot. The proposed gen-tie, including one proposed transmission tower, are located within the Dieringer Powerhouse parking lot approximately 150 feet north of the former UST area on tax parcel 052007002, and construction of the proposed tower would not disturb the former remediation area.

- Terracon Consultants conducted another Phase I ESA for the current proposed BESS facility and gen-tie properties in January 2024 (see Section A.8). Based on the 2024 Phase I ESA, the property where the proposed BESS and substation are located has been used as a storage facility since 1998. Prior to that, the site was historically used for agriculture and contained several residences. The residences have been moved or demolished. The northern portion of the property was used as a landfill until 1988, and the southern portion includes the Dieringer School gymnasium and associated parking lot. It is possible, but unconfirmed, that heating oil was stored in USTs at the gymnasium building. The landfill received a wide variety of materials, including appliances, asphalt, and 55-gallon drums with unknown contents, which were buried under clean fill. No Recognized Environmental Conditions were observed during the assessment on this parcel. However, the assessment concluded that there is potential for soil or groundwater contamination at the site of the former landfill and recommended further investigation of subsurface conditions. A Limited Site Investigation (Section A.8, Terracon Consultants, Inc., in preparation) is currently being conducted at the proposed BESS and substation site to further characterize soil and groundwater contamination at the site and determine measures to mitigate potential environmental health hazards if needed. Additionally, the Terracon January 2024 Phase I ESA report is currently being updated to include parcel areas added to the project for the current gen-tie route, including portions of parcels 9520000101, 0520072002, 0520072001, and 9520000071.

Gen-Tie: At the east end of the proposed gen-tie alignment on tax parcel 0520071008, the PSE White River Substation has confirmed levels of petroleum contamination above Washington State Department of Ecology cleanup standards in the soil and suspected levels above cleanup standards in groundwater.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

No underground hazardous liquid or gas transmission pipelines are present on the proposed BESS site or in the vicinity of the proposed gen-tie alignment.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

The BESS enclosures will house lithium salt electrolyte. The individual battery modules are fully sealed and stored in vertical racks within larger enclosures. The medium-voltage transformers for the BESS enclosures use biodegradable mineral oil. These are also fully sealed. Secondary containment will be installed around the fully sealed main power transformer at the on-site substation, which also uses mineral oil.

- 4) Describe special emergency services that might be required.

No special emergency services will be required.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

In addition to the environmental site investigations described in 7.a.1, industry-standard and regulatory safe work practices and policies and environmental management practices and policies will be followed to prevent environmental health hazards associated with the BESS enclosures.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

The dominant source of noise in the project areas is vehicular traffic on roadways. Road traffic noise will have no effect on the proposed project.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Construction vehicles and equipment will generate intermittent noise for the duration of construction. Heavy construction equipment typically generates noise levels up to 85 A-weighted decibels (dBA) within 50 feet. Construction noise generated by the project will adhere to construction noise regulations for City of Sumner and unincorporated Pierce County, which limit construction noise as follows:

- City of Sumner: Construction noise is allowed 7 am to 6 pm weekdays, 10 am to 6 pm weekends and legal holidays.

- Pierce County: Construction noise is allowed 7 am to 10 pm.

The completed project will include noise generated by HVAC cooling fans for each BESS enclosure, and the main transformer for the on-site substation. The HVAC cooling fans are anticipated to generate the highest noise levels for the project. The worst-case scenario from a noise perspective would be the project running at full electrical output on the hottest day of the summer. During such an event, each HVAC unit would generate approximately 65 dBA at 125 feet. The combined noise level for all 150 units operating at the same time would be approximately 87 dBA at 125 feet or 65 dBA at 1,500 feet. However, this scenario overestimates the typical noise levels generated by the project. A project-specific noise analysis is being prepared to model and predict noise generated by the proposed BESS facility and determine noise levels at nearby receiving properties.

3) Proposed measures to reduce or control noise impacts, if any:

Construction vehicles and equipment will be properly maintained to minimize noise levels and will be turned off when not in use. Use of impact equipment will be limited to the minimum necessary to complete the work. Construction activities will adhere to City of Sumner and Pierce County construction noise regulations.

A project-specific noise analysis is being conducted to model and predict noise levels generated by the project and determine if noise from the BESS site will result in exceedances of City of Sumner maximum permissible noise levels on nearby receiving properties, as specified in Chapter 8.14 (Noise Control) of the City of Sumner Municipal Code. Noise control design and mitigation measures will be incorporated into the project design, if needed, to prevent exceedances of maximum permissible noise levels on nearby receiving properties. These measures may include larger, slower fans that generate lower noise levels and/or noise walls. The noise analysis will be submitted to the City for review and comment when completed.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

BESS: The proposed BESS site is owned by several LLCs, including Western Self Storage LLC, Dieringer School LLC, and Dieringer Shop & Yard LLC. The southern portion of the site is currently used as a general contractor business. The northern portion of the site is currently used as a RV long-term storage site. The BESS and substation will replace the RV long-term storage site and part of the general contractor lot.

Gen-Tie: The gen-tie parcels on the east side of East Valley Highway East are owned by Cascade Water Alliance, a municipal corporation that provides drinking water to seven municipalities in King County, except tax parcel 0520071008, which is owned by PSE. The PSE parcel houses PSE's White River Substation. The PSE and Cascade Water Alliance parcels are both currently used as a transmission line corridor, with several transmission lines extending west–east toward East Valley Highway East. Below ground, a series of parallel pipelines in underground penstock tunnels carry water diverted from the west side of Lake Tapps downhill and west through the Dieringer Powerhouse adjacent to East Valley Highway East to the White River. One of the Cascade Water Alliance parcels contains a penstock forebay gatehouse and overflow well that connect to the underground tunnels. Land uses on adjacent parcels include open space and

residential developments. The proposed gen-tie alignment will not affect any current land uses on nearby or adjacent properties.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The site has not been used as working farmlands or forest lands. No farmland or forest land of long-term commercial significance will be converted to non-farm or non-forest use.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No working farms or forest land operations are present in the surrounding areas.

- c. Describe any structures on the site.

BESS: The Dieringer School (Resource ID 32414), listed in the National Register of Historic Places (NRHP), is partially located on the BESS site. The Dieringer School includes a schoolhouse, gymnasium, and boiler house with a stackhouse (chimney). The gymnasium and boiler house are on the proposed BESS site. However, the current property owner has submitted a permit application to City of Sumner to remove the gymnasium and boiler room as a separate project that would occur prior to the proposed project that is the subject of this SEPA checklist.

Gen-Tie: Structures along the proposed alignment on the west side of the highway are limited to a perimeter fence along the front of the property. On the east side of the highway, existing transmission lines and towers are present north and south of the proposed gen-tie alignment. Additionally, the Cascade Water Alliance penstock forebay gatehouse, overflow well, and penstock tunnels are present.

- d. Will any structures be demolished? If so, what?

The proposed project will not include demolishing any structures on the site.

- e. What is the current zoning classification of the site?

City of Sumner: Tax parcels 9520000174, 9520000173, 9520000168, 9820000152, 9520000143, 9520000121, 9520000101, 9520000110, and 0520072002 in the western portion of the project site are within City of Sumner and are zoned Light Manufacturing/Light Industrial (M-1). Tax parcel 0520072004, also in City of Sumner, is zoned Low Density Residential 1200 (LDR-12).

Pierce County: Tax parcels 0520071007 and 0520071008 in the eastern portion of the project site are in unincorporated Pierce County and are zoned Public Institutional.

- f. What is the current comprehensive plan designation of the site?

City of Sumner: The current comprehensive plan designations for the project tax parcels in City of Sumner are Light Industrial with a MIC (Manufacturing Industrial Core) Overlay and Public-Private Utilities and Facilities.

Pierce County: The current comprehensive plan designation for the project tax parcels in unincorporated Pierce County is Public Institutional.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable. The proposed project is located outside of the jurisdiction of both the Pierce County and City of Sumner Shoreline Management Programs.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

City of Sumner: The BESS site is classified as a Seismic Hazard Area. The western portion of the site is classified as a High Liquefaction Hazard Area, while the eastern portion of the site is classified as High Dynamic Settlement Area. The BESS site and portions of the gen-tie alignments on the west and east sides of the highway are also in an Aquifer Recharge Area and Wellhead Protection Area. The Dieringer Well, a City water source, is located on the BESS site. The BESS site and portions of the gen-tie alignments on the west and east sides of the highway are also in a Volcanic Hazard Area.

The proposed gen-tie alignment on the east side of East Valley Highway East near the highway includes the wetland and streams described in Section 3a. The gen-tie alignment on the east side of the highway is also classified as a Landslide Hazard Area. The City of Sumner Landslide and Erosion Hazard Map indicates that the proposed gen-tie alignment crosses both Type 1 (25% slopes or greater) and Type 2 (15% slopes or greater—less than 25% slopes) landslide hazard areas.

Pierce County: A large unconfirmed wetland is mapped north of the proposed gen-tie alignment in Pierce County. However, no wetlands were identified in the vicinity of the proposed gen-tie alignment in unincorporated Pierce County during the wetland delineation conducted for the project in September and November 2023. The majority of the gen-tie alignment in Pierce County is mapped as a Landslide Hazard Area. The Pierce County Landslide Hazard Area public GIS data indicate the proposed gen-tie crosses Landslide Hazard Areas on tax parcels 0520071007 and 0520071008 in unincorporated Pierce County. The gen-tie alignment in Pierce County is also within a Critical Aquifer Recharge Area.

i. Approximately how many people would reside or work in the completed project?

The completed project will not provide any housing or residences. Two permanent staff members will oversee the facility from an off-site location nearby and visit the facility daily for O&M activities. Approximately every 5 years, BrightNight will conduct a maintenance event that will require a small team of staff to perform upgrades for a period of 1–2 months.

j. Approximately how many people would the completed project displace?

The completed project will not displace any people.

k. Proposed measures to avoid or reduce displacement impacts, if any:

The project will not result in any displacement impacts; therefore, no measures are required.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

BESS: The proposed BESS site is owned by several LLCs, including Western Self Storage LLC, Dieringer School LLC, and Dieringer Shop & Yard LLC. The southern portion of the site is currently used as a general contractor business. The northern portion of the site is currently used as a RV long-term storage site. The BESS and substation will replace the RV long-term storage site and part of the general contractor lot.

Gen-Tie: The gen-tie parcels on the east side of East Valley Highway East are owned by Cascade Water Alliance, a municipal corporation that provides drinking water to seven municipalities in King County, except tax parcel 0520071008, which is owned by PSE. The PSE parcel houses PSE's White River Substation. The PSE and Cascade Water Alliance parcels are both currently used as a transmission line corridor, with several transmission lines extending west-east toward East Valley Highway East. Below ground, a series of parallel pipelines in underground penstock tunnels carry water diverted from the west side of Lake Tapps downhill and west through the Dieringer Powerhouse adjacent to East Valley Highway East to the White River. One of the Cascade Water Alliance parcels contains a penstock forebay gatehouse and overflow well that connect to the underground tunnels. Land uses on adjacent parcels include open space and residential developments. The proposed gen-tie alignment will not affect any current land uses on nearby or adjacent properties.

- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Not applicable. The project will not impact agricultural or forest lands of commercial long-term significance.

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

No housing units will be provided as part of the proposed project.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

No housing units will be eliminated as part of the proposed project.

- c. Proposed measures to reduce or control housing impacts, if any:

The proposed project will not affect housing.

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The BESS enclosures will be 9.5 feet tall, and the transmission towers will range from 65 feet to 125 feet tall. The BESS enclosures have a painted metal exterior.

- b. What views in the immediate vicinity would be altered or obstructed?

Residential developments on the ridge above the proposed gen-tie alignment surrounding the PSE White River substation have views of the White River valley. The proposed gen-tie towers will not alter or obstruct views of the valley from residences.

c. Proposed measures to reduce or control aesthetic impacts, if any:

A landscape plan will be developed to comply with City of Sumner requirements for screening the BESS and on-site substation from East Valley Highway East. The landscape plan will be submitted to the City for review and approval as part of the Design Review for the project. It is anticipated that landscaping will include small street trees and shrubs within an approximate 12-foot-wide berm along the front of the facility in front of the highway in areas that do not already contain trees.

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The BESS/on-site substation will have motion-activated downlighting around the exterior of the BESS enclosures and along access ways. The lights will mainly be visible in early morning and late afternoon (dusk), when facilities are monitored, and motion activation is triggered. The project will not produce glare.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No, lighting will only illuminate BESS/on-site substation areas and will not pose a safety hazard or interfere with views from surrounding parcels.

c. What existing off-site sources of light or glare may affect your proposal?

Off-site sources of light or glare will not affect this proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

Lights will be motion activated to minimize light impacts. Additionally, downlighting will reduce the area affected by artificial lighting and further reduce light impacts.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

No designated or informal recreational opportunities are present in the immediate vicinity of the proposed BESS site or gen-tie. The project parcels are all on and surrounded by privately owned lands that are not accessible to the public for recreation or other purposes.

b. Would the proposed project displace any existing recreational uses? If so, describe.

The project will not displace any existing recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

The project will not result in any impacts on recreation.

13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

The online Washington Department of Archaeology and Historic Preservation (DAHP) Washington Information System for Architectural and Archaeological Records (WISAARD) database was reviewed to identify any previously documented archaeological or built resources within a 1-mile radius of the project area. No archaeological sites were identified in the WISAARD database within 1 mile of the project area.

There are 17 historic resources within a 0.5-mile radius of the project area, including six historic resources within the project area:

- The Dieringer School (Resource ID 32414) is located on and adjacent to the proposed BESS site and is listed in the NRHP and Washington State Register of Historic Places. The Dieringer School site includes the schoolhouse, gymnasium, and boiler house. The schoolhouse is located adjacent to the proposed BESS site boundary. The gymnasium and boiler room are located on the proposed BESS site.
- The Northern Pacific Railroad Bridge (Resource ID 723445) is located south of the BESS site and is not eligible for the NRHP.
- The 148th Avenue East Bridge (Resource ID 723460) is approximately 0.17 miles west of the project area and is eligible for the NRHP.
- The Covington-White River No. 1 230 kV transmission line (Resource ID 672760) is located within the project area and is eligible for the NRHP.
- The Glacial Terrace Trail (Resource ID 32412), approximately 0.15 miles south of the project area, is unevaluated for the NRHP.
- The Puget Sound Power Substation (Resource ID 32427) is located north of the proposed gen-tie alignment and is eligible for the NRHP as part of the Historic Resources of the White River Hydroelectric Development. A corresponding NRHP nomination, which was not signed, includes the substation along with the following resources:
 - The Puget Power Company Garage (Resource ID 53767), Puget Power Company House (Resource ID 53760), and the Penstocks, Forebay Gatehouse, Overflow Well, and Tunnels (Resource ID 53753), located in the vicinity of the proposed gen-tie.
 - A grouping of eight related historic resources approximately 0.15 miles south of the project area consisting of the Puget Power Clubhouse (Resource ID 53759), Carpenter's Shop (Resource ID 53757), Company Cottage (Resource ID 53762), Cottage No. 5 (Resource ID 53761), Garage #1 (Resource ID 53763), Garage #2 (Resource ID 53765), Garage #3 (Resource ID 53766), and Garage #5 (Resource ID 53758).

A scatter of subsurface historic debris was discovered during the cultural resources investigation of the project. The resource is not yet fully documented (unevaluated), but historic construction debris (nails, a spike, and fragments of rusty metal) was found in two of three adjacent shovel probes at depths ranging from ~5-20 centimeters. The debris is considered to be associated with the historic construction of the White River Hydroelectric Project. The still-standing Forebay Gatehouse structure associated with the site is located approximately 50 feet away, to the northeast of the find.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

Besides the built resources and newly found historic debris scatter listed above in 13a, there are no previously recorded archaeological or built resources, historic landmarks, register properties, cemeteries, or traditional cultural places in the project area or adjacent properties. Although not yet recorded or evaluated, the PSE White River Substation is located within the project area and is at least 50 years old.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

A cultural resources desktop analysis was completed using DAHP's restricted access WISAARD database. DAHP's Statewide Archaeology Predictive Model defines the vicinity of the project area as low to high risk for encountering archaeological resources.

PSE requested a Cultural Resources Survey for this project in which the following historic resources were surveyed:

- Dieringer School (Resource ID 32414)
- The Puget Sound Power Substation (Resource ID 32427)
- Penstocks, Forebay Gatehouse, Overflow Well, and Tunnels (Resource ID 53753)

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Should archaeological materials be observed during construction activities, all work in the immediate vicinity will be halted until a qualified archaeologist can make a determination as to the significance of the find and identify an appropriate course of action, in compliance with state and federal regulations.

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The BESS site is currently served by East Valley Highway East. Ingress and egress to the facility will be via an existing access from East Valley Highway in the southern portion of the site and a new access to the highway in the northern portion of the site.

The western segment of the gen-tie alignments on Cascade Water Alliance property is accessible via a gated private access at the west end of Cottage Road East, which is accessed via Forest Canyon Road East and East Valley Highway East. The eastern segment of the gen-tie alignments on PSE property is accessible via a PSE and Cascade Water Alliance shared private access gate on the south side of the PSE White River Substation. This gate is accessed via Cottage Road East off Lakeland Hills Way. Proposed access to the project gen-tie will be the same as currently.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The site is not served by public transit. The nearest bus stop is stop 4581 on Route 497, roughly 2.5 miles away.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The proposed BESS facility will have six parking spaces for O&M staff. The project will not eliminate any existing parking spaces.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

The proposal will not require any new or improvements to existing transportation facilities.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

A north-south running Union Pacific Railroad borders the BESS site to the west.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The project will generate approximately one to two vehicle trips per day.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The proposed work is not anticipated to interfere with, affect, or be affected by the movement of agricultural or forest products on roads or streets in the area.

- h. Proposed measures to reduce or control transportation impacts, if any:

The proposed project will not result in transportation impacts; therefore, no measures are proposed.

15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposed project will not increase the need for public services.

- b. Proposed measures to reduce or control direct impacts on public services, if any.

Not applicable. The project will have no impact on public services.

16. Utilities

- a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
other _____

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Utilities proposed for the project include electricity (PSE), potable and fire water (City of Sumner), and sanitary sewer (City of Sumner).

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

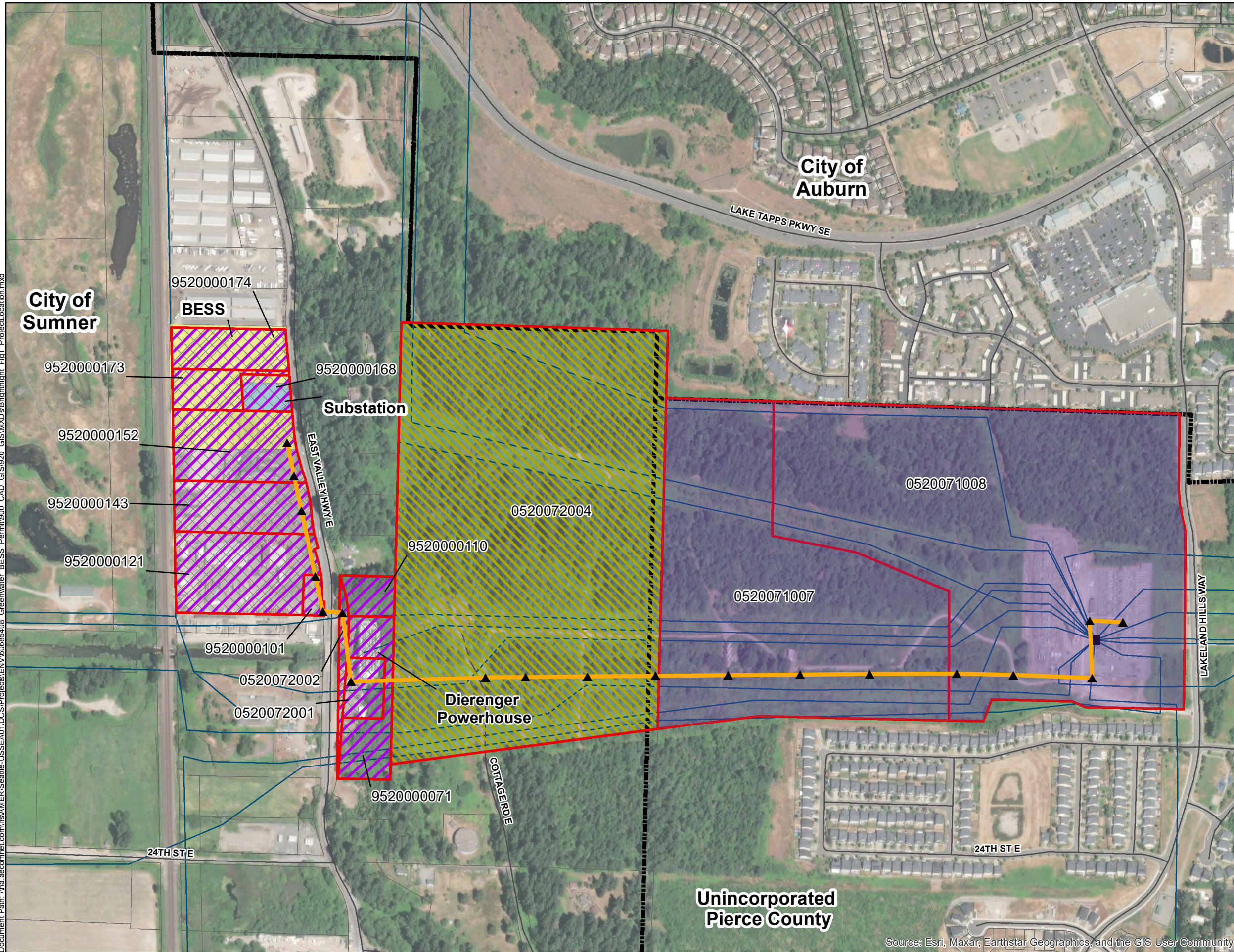
Signature: Chris Wissel-Tyson

Name of signee Chris Wissel-Tyson









Position and Agency/Organization Vice President, Development and Analytics

Date Submitted: 4/8/24




Document Path: \\na.aecomnet.com\is\AMER\Seattle-USSEA01\DCS\Projects\ENV\06865408_Greenwater BESS_Permit\900_CAD_GIS\920_GIS\MXD\Brightnight_Fig1_ProjectLocation.mxd




GREENWATER BATTERY ENERGY STORAGE SYSTEM (GREE bn, LLC, a subsidiary of BrightNight, LLC)

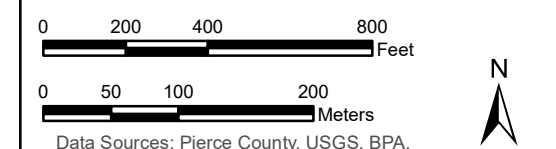
-  Project Parcels
-  Battery Energy Storage System (BESS)
-  BESS Substation
-  Proposed Gen-tie
-  Proposed Structure
-  PSE White River Substation
-  PSE Transmission Lines
-  CityLimits

City of Sumner Zoning (Shown for Project Parcels Only)

-  Light Industrial
-  Low Density Residential 12000
-  MIC Core Overlay

Pierce County Zoning (Shown for Project Parcels Only)

-  Public Institutional



Data Sources: Pierce County, USGS, BPA.

FIGURE 1
Project Location

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community