Clean Energy Coordination
Department of Ecology
PO Box 47709
Olympia, WA 98504-7709

September 29, 2026

RE: Scoping Comments for Programmatic Environmental Impact Statement on Battery Energy Storage System Facilities in Washington State

To whom it may concern,

This letter is in response to the scoping notice issued by the Department of Ecology for the Programmatic Environmental Impact Statement (PEIS) on Battery Energy Storage System (BESS) facilities in Washington State. After attending the scoping meeting on September 23, 2026, and reviewing the Scoping Document, the City of Bonney Lake (City) wishes to provide the following feedback for study in the PEIS:

- **SEPA Checklist Items D.1, D.2, D.4, D.7:** Under failure conditions, such as thermal runaway, damaged BESS and BESS treated with water or firefighting foam may release pollutants known or likely to contaminate surface and ground waters. These contaminants include, but are not limited to, lead, nitrates, heavy metals, and per- and polyfluoroalkyl substances (PFAS) common in liquid-cooled technologies. Group A and Group B water purveyors with surface water, well, or spring sources above the aquitard are especially susceptible to contamination of this nature. Please evaluate the impact of failure of BESS on water quality and supply, including the ability of these systems to comply with requirements under state and federal law.
- **SEPA Checklist Items D.1, D.2, D.4, D.7:** Due to the contaminants discharged during failure, the City currently treats the discharge as an illicit discharge under its stormwater regulations. In practice, this requires containment of the BESS, wastewater pre-treatment or isolation, and discharge to the sewer system. Please evaluate the impact of these discharges on wastewater treatment facilities and their ability to comply with effluent standards under various state and federal and federal laws. For jurisdictions that do not currently treat the contaminants discharged during failure as illicit discharges, please evaluate the impact of failure on the ability of jurisdictions to comply with obligations under Phase I or Phase II National Pollutant Discharge Elimination System (NPDES) requirements.
- **General:** The 2021 Edition of the Washington State Fire Code includes 10 distinct battery chemical compositions and three (3) generic categories. While lithium ion is commonly used, lithium iron phosphate and nickel manganese cobalt are also prevalent in failure incidents logged in the EPRI BESS Failure Incident Database. Please evaluate the impact of the chemical compositions of other common battery types used in BESS on the issues discussed above.

The City issued a SEPA Determination on September 16, 2026, under SEPA Register Number 202603919 which contains a variety of resources that may be helpful while completing the PEIS.

The City would like to become a party of record for this matter and be notified of any documents, hearings, or decisions at planning@bonneylake.gov. If you have questions about the City's comments, please contact Jason Sullivan, Public Services Director, at sullivanj@bonneylake.gov or 253-447-4355.

Respectfully,

Signed by:
Terry Carter
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Terry Carter, Mayor
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