Stand-Alone Utility-Scale Battery Energy Storage Systems PEIS

Publication 26-06-017 | Submitted by Brock J. Brady, Snoqualmie, Washington

To: Washington State Department of Ecology, Clean Energy Coordination

Re: Scoping Comment on Programmatic Environmental Impact Statement for stand-alone, utility-scale lithium-ion battery energy storage system facilities in Washington

My name is Brock J. Brady, and I live at 7927 Cortland Ave SE, Snoqualmie, WA 98065. I am submitting this scoping comment regarding the Programmatic Environmental Impact Statement for stand-alone, utility-scale battery energy storage system facilities in Washington, Publication 26-06-017.

This is not an abstract issue for my family.

A stand-alone BESS facility is proposed near my home in the Snoqualmie Valley. My family lives downstream and downwind of the proposed Cascadia project, within the same air basin, fire district, hospital service area, and evacuation network. My children attend school nearby. Snoqualmie Parkway is both our primary transportation corridor and a critical emergency route for the surrounding community.

I am also submitting with this comment a photograph I personally took on Monday, September 14, 2026, showing a cougar on the trail directly behind my home. This photograph is offered as site-specific evidence that large wildlife actively moves through the residential landscape near my property. The areas being considered for energy infrastructure are not empty spaces on a map. They are places where people live, children go to school, wildlife moves through habitat, streams and groundwater systems connect properties, and emergency responders must operate when something goes wrong.

Because this PEIS will provide a foundation for future project-level environmental reviews, the assumptions Ecology adopts now matter enormously.

I ask Ecology to address the following four issues in the PEIS.

Q1. Facility Types: Study the Facilities Actually Being Proposed Near Communities

The PEIS should analyze stand-alone, containerized lithium-ion BESS facilities located near homes, schools, neighborhoods, wildlife habitat, and constrained transportation networks, rather than relying primarily on assumptions developed for remote energy facilities.

Risks such as hazardous air emissions during battery failures, noise, wildfire danger, and limitations on fire-response access may have very different consequences when a facility is located near a residential community.

The PEIS should therefore evaluate:

- Large container-based lithium-ion installations located near residential areas.
- Facilities under the fire and building codes actually in force in Washington at the time of analysis.
- The additional protections provided by the most current nationally recognized safety standards.
- Large-scale battery fire testing and propagation risks.
- Evacuation, emergency response, environmental cleanup, and displacement as consequences of an incident, not simply the probability of ignition.
- Independent incident and safety data in addition to industry-sponsored research.

Most importantly, the PEIS should not assume that because a technology can be engineered or permitted at a particular location, that location is environmentally suitable for it.

Q2. Geographic Scope: Define Where These Facilities Should Not Be Located

The PEIS needs to do more than identify where a BESS facility could physically fit or connect conveniently to electrical infrastructure.

Proximity to a substation or transmission infrastructure is not, by itself, evidence of environmental suitability.

The geographic analysis should expressly consider and map conditions that can make a location unsuitable or substantially increase consequences, including:

- Proximity to homes, schools, hospitals, and population centers.
- Limited or single-corridor evacuation routes.
- Wildland-urban interface and wildfire hazards.
- Floodplains.
- Seismic hazards.
- Private drinking-water wells and groundwater vulnerability.
- Fish-bearing streams and sensitive aquatic resources.
- Topography and atmospheric conditions capable of trapping smoke or hazardous emissions.
- Wildlife habitat and movement corridors.

My accompanying photograph of a cougar immediately behind my home illustrates why wildlife analysis cannot be reduced to lines on a regional map. Large wildlife is actively moving through the landscape where residents live and where this development is being considered.

The PEIS should establish meaningful siting criteria that allow agencies to distinguish between locations where impacts can reasonably be mitigated and locations where surrounding conditions make the consequences unacceptable.

Q3. Impacts: Analyze What Actually Happens When a Serious Incident Occurs

The stand-alone BESS PEIS should analyze potential fire, air, water, emergency-response, evacuation, noise, seismic, cumulative, and wildlife impacts in depth.

Fire and hazardous air emissions. Model thermal runaway and hazardous-gas releases, including dispersion under local topographic and meteorological conditions such as inversion-prone valleys.

Water contamination. Analyze where contaminated fire-suppression water could travel, including pathways to groundwater, private wells, wetlands, and fish-bearing streams.

Emergency response. Evaluate multi-hour and multi-day incidents against the actual capabilities of local fire departments, HazMat resources, hospitals, law enforcement, and transportation infrastructure.

Evacuation. Treat evacuation and temporary displacement as environmental and community impacts themselves. Modeling should determine whether residents can actually leave an affected area safely during a credible incident.

Noise. Analyze continuous cooling-system and inverter noise at the nearest affected residences, particularly nighttime conditions when rural background sound levels are low.

Seismic risk. Evaluate the performance of containerized battery installations under the seismic conditions where facilities may actually be constructed.

Cumulative impacts. Study what happens when multiple BESS facilities or other major energy infrastructure are concentrated along the same electrical, transportation, watershed, or emergency-response corridor.

Wildlife and habitat. Analyze habitat fragmentation, fencing, lighting, noise, construction disturbance, and disruption of wildlife movement associated with industrial-scale BESS development.

A PEIS that evaluates only whether an incident is statistically likely will miss the fundamental land-use question. Ecology should also evaluate the consequences when a low-frequency event occurs in a location where people, critical roads, drinking water, wildlife, and emergency services may be affected.

Q4. Mitigation: Give Local Governments Enforceable Protections

The PEIS should identify specific mitigation measures that state agencies and local governments can actually incorporate into permits, including consideration of:

- Minimum setbacks from residences, schools, hospitals, and drinking-water wells.
- Current large-scale battery fire testing requirements, including UL 9540A.
- Application of current nationally recognized BESS safety standards, including NFPA 855.
- Site-specific hazardous-gas dispersion analysis.
- Firewater containment, testing, removal, and disposal plans.
- Emergency-response plans developed with the responsible local fire district.
- Developer-funded specialized training and necessary response equipment before operations begin.
- Enforceable nighttime noise limits measured at affected residences.
- Emergency evacuation and traffic-management plans.
- Groundwater and surface-water monitoring where appropriate.
- Decommissioning requirements and adequate financial assurance for cleanup and restoration.

The PEIS should also address financial responsibility following a serious incident. The public, local governments, emergency responders, and neighboring landowners should not bear the financial consequences of contamination, emergency response, evacuation, long-term monitoring, or site cleanup caused by a privately developed facility.

Where an impact cannot reliably be mitigated, the PEIS should say so plainly.

Why This Scoping Decision Matters

The Snoqualmie Valley demonstrates why a statewide PEIS cannot assume BESS facilities will be isolated from people or sensitive environments. Here, homes, schools, wildlife habitat, streams, groundwater, steep terrain, emergency-response resources, and transportation corridors exist together within a constrained landscape.

The photograph accompanying my comment was taken behind my own home. That cougar does not know where a parcel boundary ends. Neither does smoke, contaminated runoff, groundwater, wildfire, or an evacuation emergency.

That is precisely why the PEIS should evaluate BESS siting at the landscape and community level, rather than treating each individual impact in isolation.

I respectfully ask Ecology to ensure that the Draft PEIS:

1. Treats proximity to residents and sensitive resources as a defining condition of the analysis.
2. Identifies locations and conditions where BESS development may be environmentally unsuitable.
3. Evaluates realistic worst-case consequences in addition to incident probability.
4. Establishes specific, enforceable mitigation measures.
5. Clearly identifies significant impacts that cannot reliably be mitigated.
6. Fully considers wildlife habitat and movement in areas proposed for stand-alone BESS development.

Thank you for considering my comment and including it, along with the accompanying wildlife photograph, in the official scoping record.

Our community is following this PEIS closely and intends to participate in the Draft PEIS process.

Brock J. Brady
Snoqualmie, Washington

Attachment 1: Cougar Photograph

Photograph reference for the scoping record

Subject: Cougar observed on the trail directly behind my home in Snoqualmie, Washington.
Date photographed: Monday, September 14, 2026.
Photographer: Brock J. Brady.
Location description: Trail directly behind my residence at 7927 Cortland Ave SE, Snoqualmie, WA 98065.
Purpose: Submitted with this scoping comment as site-specific documentation that large wildlife actively moves through the residential landscape near my property and to support my request that the PEIS analyze wildlife habitat, movement corridors, fencing, lighting, noise, construction disturbance, and habitat fragmentation.

INSERT / UPLOAD COUGAR PHOTOGRAPH HERE

Suggested filename: Brady_Cougar_Snoqualmie_2026-09-14.jpg