CITY OF
SUMNER
WASHINGTON

1104 MAPLE STREET, SUMNER WA 98390

September 30, 2026

Department of Ecology

RE: Scoping Comments for Battery Energy Storage Systems (BESS) Programmatic Environmental Impact Statement (PEIS)

Dear Reviewer:
Thank you for the opportunity to comment on this important document. The City of Sumner has a utility-scale BESS facility under construction and will bring on 200MW of storage capacity in the next 6 months. Our experience with permitting the BESS and drafting zoning code text amendments related to BESS has informed our comments presented as follows:

1. **Land Use.** Consider dividing the analysis between *rural geographies* and *urban geographies* as potential impacts will vary based on development densities, sensitive areas, proximity to sensitive uses such as schools and hospitals, etc. The analysis can then address urban related issues in a separate discussion from rural land uses and be more helpful to the end user.

2. **Land Use.** Geographical areas that should not be available for utility-scale BESS:
   - Shorelands per the Shoreline Management Act
   - Critical areas such as geologically hazardous areas, wetlands and buffers, streams and buffers;
   - Wellhead protection areas
   - Municipal watersheds
   - Wildlife conservation/preservation areas

3. **Noise.** Noise impacts could be substantial for large systems that are 25MW and larger and may contain mechanical and cooling systems, transmission equipment, etc. that have a high decibel or low-frequency hum that could be impactful to neighboring residential uses whether urban or rural in character. Mitigation measures such as required minimum distances from residentially zoned properties, mandatory noise studies, using C-weighted decibel scales to best identify low frequency noises, and physical/structural noise mitigation as part of the design and commissioning of a BESS.

4. **Aesthetic.** Address the potential for the use of short (less than 1000 feet) transmission lines that may be necessary for connecting to the electrical grid.

5. **Fire and explosion mitigation**:

- Require that battery equipment be UL9540A tested and shown not to propagate, etc.
- Prohibit BESS from being located within a structure to prevent build-up of flammable and explosive gases if there is a fire.

6. **Land Use/Fire/Safety.** Utilize a minimum separation between BESS facilities within and urban area to avoid a concentration of these facilities in any one location burdening neighborhoods or just a few cities.

7. **Aesthetic Impacts:** Assess impacts as it relates to aesthetic and mitigation that could include safely screening a BESS with vegetation, structures, to reduce visual impacts, especially in urban areas.

8. **Environmental Justice.** Consider analyzing demographics, median income, and other factors when determining where a BESS should be allowed. Tribal lands and residential uses/zones adjacent to industrial areas are both likely to be closer to a future BESS facility than more affluent neighborhoods and therefore face increased risks of noise, fire, emissions, etc.

9. **Public Services and Utilities.** Analyze and discuss the abilities of rural fire districts to properly and adequately prepare for and manage an incident at a BESS. Address how they keep up with annual training, equipment requirements and adequate staffing levels when siting BESS facilities. Mitigation such as additional permitting fees or ongoing funding for rural fire districts may be an option to keep up with necessary preparedness and be able to respond effectively and promptly to an incident.

10. **Water Resources.** Analyze potential for ground water and surface water contamination if there is a battery failure/fire and fire response that involves large amounts of fire-activity water that goes into the stormwater system uncontrolled and untreated.

Please let me know if you have any further questions or would like to discuss. Email: ryanw@sumnerwa.gov.

Sincerely,
Ryan Windish
Community & Economic Development Director