Memo

To: Department of Ecology

From: Salina Lyons, Community Development Director

CC: Regan Bolli, City Manager

Date: September 22, 2026

Re: Covington's Comments: BESS PEIS Scoping Document (Publication 26-06-017)

SCOPING COMMENTS THE CITY CAN CONSIDER PROVIDING

Covington recommends that Ecology provide additional analysis and guidance on the following topics within the proposed scope:

1. **Demands on local fire departments and emergency services**. This includes response time, training, specialized equipment, evacuation, water supply, and air pollution monitoring. The PEIS should recognize that smaller jurisdictions may have limited response capacity. (*Environmental Health, Safety & Public Services*)

    a. **Mitigation**: Should identify and address project related training, equipment, monitoring, and response costs that are to be assigned to the applicant/facility when attributed to the project.

2. **Impacts to water systems**. This includes water used in a fire response, damaged battery materials, and contaminated runoff that would affect stormwater systems, groundwater, and critical areas. (*Water Resources and Environmental Health*)

    a. **Mitigation**: Identify general measures for containment, monitoring, cleanup, and financial responsibility for cleanup and remediation.

3. **Proximity and Demand**. The scoping document states that Ecology may focus the PEIS on areas where BESS development is more likely, including areas near existing electrical infrastructure. Ecology should explain the assumptions used to identify these areas and consider a range of settings, including urban areas, smaller cities, towns, and rural counties. *(Land Use and Cumulative Impacts)*

    a. **Mitigation**: Identify general siting and design considerations for facilities near schools, hospitals, homes, care facilities, and other locations with vulnerable populations or limited evacuation options.

4. **Cross-Jurisdictional Impacts**: A BESS facility may be in one jurisdiction while affecting a neighboring city, school district, fire authority, or utility service area.

The PEIS should address how project level review identifies and evaluates impacts outside the permitting jurisdiction. This should include impacts to nearby populations, schools, emergency services, evacuation routes, roads, and public infrastructure.

The PEIS should also provide guidance on when to notify and consult neighboring jurisdictions and affected service providers. *(Land Use and Cumulative Impacts)*

a. **Mitigation**: The PEIS should identify best practices for coordinating emergency planning, public communication, response responsibilities, and project related costs when the permitting jurisdiction and affected communities or service providers are different. The PEIS should also identify which matters must be resolved during project level review. Additional documents could include a sample interlocal agreement, method for calculating and assigning project related costs, and a list of emergency planning topics.

5. **Local Review:** The Final PEIS should clearly identify which findings may be used in a future project-level SEPA review and which issues will require new site specific information.

   This distinction is important for smaller jurisdictions. It will help applicants understand what information must be submitted and help local agencies determine when additional technical review, mitigation, or environmental analysis is needed. *(Land Use and Cumulative Impacts)*

   a. **PEIS Guidance:** Provide a project review checklist that identifies information covered by the PEIS, information typically required from an applicant, and issues that must be evaluated based on the proposed facility and site. The checklist should also identify when specialized technical review may be needed**.**

6. **Noise, Visual Impacts, and Site Design:** The PEIS should evaluate common noise and visual impacts of utility scale BESS facilities, including cooling equipment, transformers, inverters, lighting, fencing, and security features. The analysis should consider how these impacts may differ in residential, urban, and rural settings. *(Noise and Vibration, Land Use, and Aesthetics and Visual Quality)*

   a. **Mitigation**: Identify when an engineered fire barrier may be appropriate and the factors that should be considered, including fire resistance, wall height and location, battery testing, nearby uses, ventilation, drainage, security, and emergency access.

7. **Construction and Operations:** The PEIS should distinguish between temporary construction employment and permanent operational employment. It should describe typical construction duration, workforce size, construction traffic, and long term staffing for utility scale BESS facilities. *(Transportation, Public Services and Utilities, and Environment and Safety)*

a. **PEIS Guidance**: The PEIS should explain typical monitoring, alarm response, maintenance, security, and emergency contact practices for the facility once it becomes unmanned. This information will help communities understand both the short term benefits and the long term demands of these facilities.

8. **Facility Closure and Financial Responsibility**: The PEIS should evaluate battery replacement, damaged equipment, recycling, facility closure, site cleanup, and restoration. It should also consider the risk that a facility owner could sell, abandon, or cease operating the project. *(Environmental Health and Safety, Land Use, and Cumulative Impacts)*

    a. **Mitigation**: Identify general approaches for decommissioning plans and financial assurance so removal, cleanup, and restoration costs do not become the responsibility of the property owner or the City.