Karl de Jong

Subject: Scoping comments on the Battery Energy Storage Systems PEIS, Publication 26-06-017

Dear Ecology Clean Energy Coordination Team:

I am submitting these comments as an individual resident of Sedro-Woolley, Washington. I generally support battery energy storage with appropriate safeguards. I want this study to help communities make informed decisions about where facilities belong, how people will be protected, and who will remain responsible throughout a facility's life.

I appreciate Ecology's inclusion of environmental health and safety, land use, water resources, public services, and cumulative impacts. My requests concern the practical detail needed to make that analysis useful, particularly for smaller communities. I understand that this statewide study will inform subsequent project reviews and does not decide individual permits. [1]

Siting and compatibility

For Sections 5.2 and 5.3, please explain how the study will compare facility types and identify suitable geographic areas. Proximity to electrical infrastructure should be considered alongside environmental constraints and the ability to protect nearby people.

Evaluate how siting considerations change with power output, total stored energy, battery chemistry, enclosure design, and protective systems. Please identify which differences materially affect potential impacts and what information local reviewers need to evaluate them.

Develop screening guidance addressing nearby homes, schools, care facilities, waterways, flood and seismic hazards, emergency access, and evacuation routes. Include routine operating noise and cumulative demands where multiple facilities depend on the same response resources. Explain how disproportionate impacts and tribal rights and resources will inform the analysis.

The useful result would be evidence-based criteria for identifying lower-conflict locations and conditions requiring closer review. Where separation distances are discussed, explain their purpose, supporting evidence, and limits. Distinguish equipment spacing from protection of neighboring uses and incident-specific emergency zones.

Public notification and understandable information

Within Section 5.4 and any companion guidance, please evaluate how early public information can improve siting decisions and implementation of safeguards.

Residents should have an opportunity to understand a proposal while meaningful choices remain available. Please identify the information needed at that stage, including facility scale, technology, potential impacts, proposed safeguards, responsible contacts, and opportunities to comment. Evaluate notification that reaches renters, nearby residents across jurisdictional boundaries, and

people who need translated or accessible information.

Separately, examine emergency alerts: who issues them, how agencies coordinate, and how people without reliable internet access receive instructions. Include residents who may need assistance evacuating and facilities responsible for people in their care.

Please recommend a public-information checklist and criteria for renewed notice when changes materially affect impacts or response plans. Distinguish required disclosures from recommended practices, and identify legitimate security limits without unnecessarily withholding useful safety information.

Fire response and local preparedness

For Section 4 and Section 5.4, please evaluate credible incident scenarios and the capabilities needed to manage them. EPA's guidance supports advance coordination with responders and consideration of emissions, runoff, and damaged-battery handling. [2]

The study should distinguish relevant battery chemistries and configurations when drawing lessons from incidents. Explain limitations in incident data and identify remaining uncertainty, including the possibility of extended incidents or re-ignition.

Please develop a method for assessing readiness before operation. It should address detection and notification, site access, trained personnel, equipment, operator support, mutual aid, and continued emergency coverage elsewhere in the community. Include how training and plans remain current through staffing, ownership, or equipment changes.

Evaluate air monitoring, public protective actions, and water supply and runoff containment where relevant to the response strategy. Identify what would trigger post-incident sampling and how results would be communicated.

Please explain what equipment certification and representative fire testing establish and what still requires evaluation for the actual installation. UL 9540A is a test method; local reviewers need help understanding the applicability and limitations of test results. [3] Clearly separate enforceable Washington requirements from newer standards or recommended practices. Response guidance should account for the installation and incident rather than prescribe one tactic for every facility.

Decommissioning and site restoration

Please make end-of-life responsibilities explicit in Section 5.4. Evaluate normal retirement alongside early closure, abandonment, ownership changes, repowering, and incident-damaged facilities.

Identify the components of a credible plan: responsible parties, implementation triggers, schedules, removal and transport arrangements, waste destinations, contamination assessment, restoration, and verification that work is complete.

The analysis should address whether suitable contractors and disposal or recycling capacity would be available when needed, particularly for damaged batteries. Explain what happens if the original operator is no longer available or an intended recycling arrangement falls through.

NYSERDA's advisory model offers examples of decommissioning and ownership-transfer provisions for comparison, although it does not establish Washington requirements. [4] Please evaluate which approaches could usefully inform Washington guidance.

Financial responsibility and implementation

Please evaluate how the safeguards identified in the study would remain funded when they are needed. A plan should identify both the responsible party and a reliable means of carrying out the work.

Compare the purposes and limitations of insurance, decommissioning security, contractual commitments, and cost-recovery arrangements. Consider independently reviewed cost estimates, inflation, changes in facility design, uncertain salvage value, insolvency, coverage exclusions, and access to funds following an incident.

Distinguish routine retirement costs from incident cleanup and ongoing preparedness. Examine whether obligations and financial protection remain effective through ownership transfers and how deficiencies would be identified and corrected.

For each approach, identify the responsible agency, available authority, and any need for additional policy or legislation. Washington's SEPA rule ties applicant mitigation obligations to identified project impacts and requires consideration of existing requirements. [5] Recommendations should respect those limits while addressing gaps that could leave necessary work unfinished or costs with the public.

I would find a concise local-government checklist especially useful: what must be evaluated, what evidence is needed, who implements each safeguard, and how completion is verified. Please distinguish existing requirements, recommended practices, and questions reserved for individual project review. Where an issue falls outside this PEIS, identify a practical route for companion guidance or interagency work.

Thank you for considering these requests. My goal is responsible battery storage development supported by clear expectations that communities, responders, and project owners can put into practice.

Karl de Jong
Sedro-Woolley, Washington

References

[1] Washington Department of Ecology. Battery Energy Storage Systems PEIS Scoping Document, Publication 26-06-017, September 2026. Sections 1.3–1.4, pp. 11–12; Section 4, pp. 16–19; Sections 5.2–5.4, pp. 20–22.

https://apps.ecology.wa.gov/publications/documents/2606017.pdf

[2] U.S. Environmental Protection Agency. Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response, EPA 530-F-25-013, July 2025, pp. 1–3. https://www.epa.gov/system/files/documents/2025-08/battery_energy_storage_systems_fact_sheet.pd

[3] UL Solutions. Installation Codes and Requirements for Energy Storage Systems (ESS) – FAQs. Accessed September 22, 2026. https://www.ul.com/resources/installation-codes-and-requirements-energy-storage-systems-ess-faqs

[4] NYSERDA. New York Battery Energy Storage System Guidebook for Local Governments, November 2024. Advisory status, p. 1; model-law provisions, printed pp. 10–13. https://www.nyserda.ny.gov/-/media/Project/Nyserda/files/Programs/clean-energy-siting/battery-stora

[5] Washington Administrative Code, WAC 197-11-660, particularly subsection (1)(a)–(e). https://app.leg.wa.gov/WAC/default.aspx?cite=197-11-660