Henrika Stich

Dear Department of Ecology:

I strongly object to recommendations provided by Clean Energy Coordination/CIP Terra Technologies that could allow compliance with the BESS PEIS to substitute for meaningful project-specific environmental review.

CIP asks Ecology to accommodate technologies that may not yet exist, allow certain equipment substitutions without new review, permit important technology information to remain unresolved during permitting, and establish a PEIS "consistency" process designed to reduce subsequent project-level analysis.

Ecology should reject any categorical approach of this kind.

Washington law requires agencies to properly define the proposal undergoing environmental review. Closely related proposals that effectively constitute a single course of action must be evaluated together where the criteria of WAC 197-11-060 are satisfied.

Equally important, WAC 197-11-600 expressly preserves additional or supplemental environmental review when substantial project changes or new information indicate probable significant adverse environmental impacts not covered by existing environmental documents. Ecology therefore should not declare in advance that future battery technologies, altered equipment, or post-permit substitutions will automatically be covered by today's PEIS.

CIP's own comments demonstrate why this protection is necessary. CIP identifies wildfire exposure, emergency-response capability, proximity to streams, wetlands and drinking-water sources, firefighting-water containment, battery chemistry, enclosure configuration, extreme-weather performance, and Tribal interests as relevant considerations. These factors cannot reasonably be presumed identical at every future location.

I therefore respectfully request that Ecology expressly provide that:

PEIS consistency does not constitute automatic project approval or eliminate independent SEPA review.
Future technology and material equipment changes remain subject to additional environmental review when required under SEPA.
Material safety and environmental information necessary to evaluate significant impacts cannot simply be deferred until after project approval.
A PEIS checklist or consistency worksheet cannot replace site-specific evaluation of fire, water, wildfire, emergency-response, noise, public-health, Tribal-resource, and other significant environmental impacts.
The PEIS must remain a baseline for environmental analysis, not a ceiling limiting what local agencies may examine when site conditions or new information demonstrate additional environmental risk.

Programmatic review can promote efficiency, but efficiency cannot come at the expense of

meaningful environmental review or the safeguards Washington's SEPA regulations expressly preserve.

Respectfully submitted,
Henrika Stich
Washington Resident