

Anonymous

Thank you for the opportunity to comment on the scope of the Programmatic Environmental Impact Statement (PEIS) for stand-alone Battery Energy Storage Systems (BESS).

The 2025 programmatic environmental reviews for wind, solar, and green hydrogen facilities, including co-located battery storage, provided valuable analysis of operational and siting-related concerns such as wildfire risk, hazardous air emissions from battery failures, noise, emergency response, and environmental justice. The standalone BESS PEIS presents an opportunity to build upon that work by more fully examining the broader material and resource systems that would be needed to support large-scale battery deployment in Washington.

Battery storage systems are not merely energy technologies. They are highly material-intensive industrial products that depend upon extensive supply chains, mineral extraction and processing, energy-intensive manufacturing, transportation networks, and end-of-life management systems. Understanding these dependencies is important to providing decision-makers and the public with a more complete picture of the environmental context surrounding large-scale deployment.

The PEIS should evaluate not only the environmental impacts associated with the siting, operation, maintenance, and decommissioning of battery facilities in Washington, but also the reasonably foreseeable upstream and downstream environmental effects associated with battery production, replacement, recycling, and disposal. Such analysis need not attempt to regulate activities occurring elsewhere. Rather, it should help characterize the broader systems upon which battery deployment depends and identify potential cumulative environmental implications associated with increasing deployment over time.

Because Ecology has identified Earth Resources, Energy and Natural Resources, Environmental Justice, Tribal Interests, and Cumulative Impacts as key areas of study, consideration of upstream material requirements (and disposal considerations) appears directly relevant to the scope of this review. Sound environmental review requires consideration of the material inputs, infrastructure needs, and lifecycle requirements associated with the technologies being deployed. Thank you in advance! A meaningful assessment of battery energy storage will help provide decision-makers and the public with a clearer understanding of the cumulative environmental implications associated with large-scale deployment.