Conservation Northwest (Jordan Ryckman)

Thank you - Comment attached.

Conservation Northwest
Keeping the Northwest Wild

Clean Energy Coordination
Department of Ecology
P.O. Box 47709
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October 1, 2026

RE: Battery Energy Storage Systems Scoping for Programmatic Environmental Impact Statement

Dear Clean Energy Coordination members,

Thank you for the opportunity to comment on the scope of the Programmatic Environmental Impact Statement (PEIS) for Battery Energy Storage Systems (BESS). Conservation Northwest works to protect, connect, and restore native habitats, with particular attention to landscape-scale linkages and the species that depend on them. Through our Sagelands Heritage Program, we participate in clean energy planning across Washington's Columbia Plateau region, with a focus on protecting shrub-steppe habitats and wildlife while also supporting the statewide clean energy transition. We support community-led, collaborative siting and planning approaches that advance climate goals while protecting wildlife, wildlands, productive agricultural lands, Tribal rights and resources, and local communities. We recommend that the PEIS address the following:

I. Types of facilities to be evaluated

Although the PEIS is set to focus primarily on utility-scale BESS, it should also evaluate residential and commercial systems as distinct facility types that will contribute to our energy grid and have different footprints, risks, and infrastructure needs. This broader analysis could identify opportunities to meet demand closer to load centers and distribute impacts more equitably, rather than continuing to concentrate clean energy development in Washington's rural landscapes.

II. Assumptions to identify the geographic scope of study used for the PEIS analysis

The geographic scope should account for access to existing infrastructure, suitable transmission lines, fire districts, and areas of high energy demand. Alternatives could prioritize degraded sites, brownfields, previously disturbed lands, and locations near existing energy or industrial facilities – especially when those choices would reduce pressure on intact habitat, productive farmland, and

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culturally important areas. If possible, the PEIS should also identify existing BESS networks[1] alongside potential development areas.

Identifying areas unsuitable for development as well as areas with development potential will support strategic review and planning efforts. In addition to early, meaningful and consistent Tribal consultation and community engagement, the PEIS can also be informed by spatial priority data resources like the Washington Department of Fish and Wildlife's Wind and Solar Guidelines[2] (where relevant to BESS and co-located projects); the Washington Shrub-steppe Restoration and Resiliency Initiative[3] (WSRRI); the Washington Habitat Connectivity Action Plan[4] (WAHCAP); the Washington Information System Architectural and Archaeological Records Database[5] (WISAARD); related PEISs for utility-scale solar, onshore wind, and transmission; and other regional energy infrastructure and land-use maps.

III. Potential impacts to environmental resources to analyze

BESS facilities often require fencing, graveled surfaces, container arrays or warehouse buildings, concrete foundations, access roads, and supporting infrastructure. Construction and site preparation can remove habitat and topsoil, displace native species, create barriers to wildlife movement, and fragment habitat. We strongly encourage that the PEIS include additional research and resources addressing the direct and indirect impacts of these facilities on wildlife and ecosystems, as well as the potential cumulative impacts of concentrating projects in certain areas.

Because lithium-ion batteries can pose significant fire hazards to susceptible shrub-steppe environments, the PEIS should evaluate appropriate setbacks and facility design; prevention and mitigation measures; responder training and emergency preparedness, and how risks may differ among habitat types.

We support the inclusion of potentially significant impacts identified in prior PEISs for BESS co-located with wind and solar, including Tribal rights, interests, and resources; environmental justice; health and safety; biological resources; noise and vibration; and public services and utilities in addition to determining potential impacts for standalone facilities. Using consistent methods and terminology will align the BESS PEIS with related statewide analyses.

[1] https://www.nwcouncil.org/energy/energy-topics/power-supply/map-of-power-generation-in-the-northwest/
[2] https://wdfw.wa.gov/sites/default/files/publications/02662/wdfw02662.pdf
[3] https://wdfw.wa.gov/species-habitats/habitat-recovery/shrubsteppe
[4] https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan
[5] https://dahp.wa.gov/project-review/wisaard-washington-information-system-for-architectural-and-archaeological-records-data

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IV. Potential mitigation measures to consider

Proposed mitigation measures often outlined in this section tend to work under the assumption that the replacement, enhancement, or substitution of resources or environments would be possible. We encourage the council to consider and apply an avoid-minimize-mitigate framework, prioritizing avoidance for imperiled or irreplaceable resources. This would include shrub-steppe, Oregon white oak woodlands, old-growth forests, wildlife corridors, cultural resources and traditional sites, and productive agricultural lands that cannot easily be restored, replaced, or mitigated.

In addition to project-specific mitigation, the PEIS should identify clear standards and practices for BESS siting, construction, operations, and decommissioning. These standards should address site selection, system design and configuration, wildfire prevention and response, public safety, preservation of cultural resources, and threatened wildlife and habitat avoidance.

Lastly, we would appreciate clarification in this PEIS of the expected lifespan of BESS facilities and the requirements for decommissioning, site restoration, repowering or other upgrades.

V. Cumulative Impacts and Co-Location

We encourage the evaluation of standalone BESS facilities as well as their potential cumulative impacts with nearby transmission, generation, data centers, and other supporting infrastructure. The cumulative impacts analysis should address habitat loss and fragmentation, barriers to wildlife movement, agricultural land conversion and productivity, Tribal rights and cultural resources, public services, and community safety. It should also assess whether co-location with existing clean energy projects, industrial facilities, or data centers could reduce new disturbance or whether concentrated development could create additional environmental or community burdens.

In summary, we recommend that the PEIS evaluate BESS facilities of all scales; prioritize avoiding impacts to irreplaceable resources; establish clear mitigation measures and standards; address wildfire prevention and emergency response needs specific to shrub-steppe habitats; incorporate existing state data and analyses; and evaluate individual and cumulative impacts, including the potential benefits and risks of co-location.

Thank you for considering these comments and for advancing strategic clean energy planning that protects habitat, wildlife, cultural resources, agricultural lands, and the communities that depend on them.

Sincerely,

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