Callie Brady

October 1, 2026

Clean Energy Coordination
Washington State Department of Ecology
PO Box 47709, Olympia, WA 98504-7709

Re: Scoping comments on the Battery Energy Storage System Facilities PEIS, and response to Jupiter Power's October 1, 2026 comments

Dear Ecology:

I am a Snoqualmie resident and I support a rigorous PEIS. I am writing because Jupiter Power's scoping comments ask Ecology to narrow the hazard analysis in ways that would make the PEIS less useful to the public and to permitting agencies. Ecology's scoping document notes that the facilities studied in the 2025 solar and wind PEISs were unlikely to be in or near cities, while stand-alone facilities could be sited in a variety of locations. The Cascadia Ridge proposal, across Snoqualmie Parkway from Snoqualmie Ridge and near Cascade View Elementary School, shows this is not hypothetical. I ask Ecology to scope the PEIS as follows.

1- Analyze each battery chemistry separately. Jupiter asserts that chemistry makes "little difference" for most impacts. For the impacts that matter most near homes (fire behavior, off-gassing, toxic releases, and water contamination), chemistry is the primary variable. Lithium-ion subtypes, sodium-ion, flow, and metal-air systems fail in different ways and require different mitigation. If Ecology expands beyond lithium-ion, each chemistry should receive its own hazard profile. Any chemistry not individually analyzed should be ineligible to tier to the PEIS.

2- Define facility tiers by stored energy and by distance to people. Jupiter asks that the analysis not be limited by capacity or duration. The consequences of a failure scale with stored energy, so tiers should be defined in MWh, not only MW. Ecology should also define proximity tiers by distance to homes, schools, childcare, and medical facilities. The PEIS should state plainly that projects outside the studied envelope require full project-level analysis.

3- Require independent expertise. I agree that fire safety analysis requires specialists. Those specialists should have no financial ties to BESS developers, manufacturers, or suppression vendors, and should disclose any conflicts. Ecology should also consult the State Fire Marshal, local fire districts, public health agencies, and independent academic researchers. The evidence base should include independent post-incident research, such as the peer-reviewed study that found elevated nickel, manganese, and cobalt in Elkhorn Slough soils after the January 2025 Moss Landing fire, which led to evacuation orders for about 1,200 residents.

4- Identify mitigation clearly. Jupiter urges caution in identifying potential impacts and recommending mitigation. That is contrary to the purpose of a PEIS and to SEPA. RCW 43.21C.031(2) requires an EIS to analyze probable significant adverse impacts and addresses alternatives including mitigation measures. The PEIS should set baseline mitigation, and the applicant should carry the burden of showing a measure is unnecessary at a given site. Mitigation

should be measured against codes actually enforceable here. The scoping document acknowledges that the 2026 edition of NFPA 855 has not been adopted into state code and that state code references earlier UL editions. Where that gap exists, the PEIS should recommend mitigation beyond code minimums. This matters more for projects permitted through EFSEC, which may not be bound by local BESS ordinances.

5- Establish minimum setbacks based on generalizable harms. Jupiter argues that traditional impacts are too site-specific to analyze. Many are not: plume dispersion from thermal runaway, contaminated firefighting runoff, continuous noise from cooling systems and inverters, and local emergency response and evacuation capacity. Ecology's 2025 PEISs already identified noise within 1,000 feet of residents, hazardous air emissions from battery failure, and fire response as potential significant impacts. The PEIS should recommend minimum setbacks from homes, schools, drinking water wells, floodplains, and fish-bearing streams, scaled to the MWh tiers in item 2, and should model dispersion under adverse conditions including temperature inversions.

6- Analyze evacuation capacity as a siting factor. The PEIS should treat evacuation as a generalizable impact under public services and environmental health and safety. For any facility near a populated area, it should call for modeled evacuation time estimates based on the number and capacity of exit routes, the population inside a potential plume zone, dismissal and pickup logistics at multiple schools, and possible hospital evacuation. It should also analyze evacuation during a concurrent hazard such as flooding, landslides, or a highway closure. Snoqualmie Ridge illustrates the problem. The community has two ways in and out, and the proposed Cascadia Ridge site sits between them, off Snoqualmie Parkway. On December 10, 2025, a landslide closed eastbound I-90 near North Bend for nearly 24 hours. With traffic diverted onto local roads, traffic was snarled for hours. The PEIS should recommend against siting where the surrounding population cannot be evacuated within a defined time, and should have it's own independent studies to address when shelter-in-place is and is not protective. (Source: KIRO 7, https://www.kiro7.com/news/local/landslide-i-90-blocks-lanes-cars-near-north-bend/Q3VLQLQ6XVI

7- Analyze earthquakes as an initiating event. Western Washington is exposed to both Cascadia subduction zone and shallow crustal fault earthquakes. Unlike a single-unit failure, an earthquake can damage many battery enclosures at once while also disabling grid power, cooling, monitoring, and suppression systems. The same event would damage roads, bridges, and water supply and would commit fire crews elsewhere. The PEIS should analyze this common-cause scenario, including aftershocks, rather than relying on failure rates drawn from normal operating conditions. It should identify seismic design and anchoring mitigation beyond code minimums, and recommend siting exclusions for fault zones, liquefaction-prone soils, and landslide hazard areas.

Thank you for considering these comments.
Sincerely,
Callie Brady
Snoqualmie, WA