# Henrika Stich

Dear Department of Ecology:

I strongly oppose any BESS PEIS framework that creates a presumption that utility-scale battery facilities are environmentally acceptable merely because they comply with industry standards such as NFPA 855.

Renewable Northwest's comments emphasize industry standards, future design flexibility, siting near urban load centers and substations, and the separation of normal operations from failure events. BESS PEIS Scoping Comments RNW also acknowledges concerns involving fire, water and air impacts, noise, contamination during incidents, and BESS siting.

These issues require independent environmental analysis, not presumptions of safety.

Washington's SEPA rules provide that:

Environmental significance is site-specific. WAC 197-11-330 expressly recognizes that the same proposal may have a significant adverse impact in one location but not another.
Multiple impacts matter collectively. The same regulation recognizes that several marginal impacts considered together may result in a significant adverse impact.
Direct, indirect, and cumulative impacts must be considered within SEPA scoping.
An EIS must provide an impartial discussion of significant environmental impacts and reasonable alternatives, including mitigation measures.

Accordingly, I respectfully request that Ecology:

Reject any presumption that NFPA 855 compliance alone establishes environmental acceptability or appropriate siting.
Require meaningful site-specific analysis of fire and thermal-runaway consequences, air and water impacts, soil impacts, noise, wildfire conditions, emergency-response capability, and sensitive receptors.
Independently evaluate credible accident and contamination scenarios, rather than relying primarily on industry representations concerning fire behavior or contaminated runoff.
Do not presume that proximity to substations or urban load centers makes a site environmentally appropriate. SEPA expressly recognizes that environmental significance can depend on location.
Preserve environmental review of future battery technologies and materially different designs rather than assuming future systems are adequately addressed simply because they comply with an industry standard.
Evaluate direct, indirect, and cumulative impacts, including circumstances where multiple facilities or related infrastructure may affect the same community or environmental resources.
Do not allow claimed economic, reliability, or clean-energy benefits to replace impartial analysis of significant adverse environmental impacts, alternatives, and mitigation.

Washington's energy objectives are important, but they do not eliminate SEPA's environmental protections.

The BESS PEIS should establish a rigorous environmental baseline, not a statewide shortcut around meaningful project-specific environmental review. Public safety, environmental protection, and independent scientific analysis must remain central to every BESS siting decision.

Respectfully submitted,
Henrika Stich
Washington Resident