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East Side Energy Storage:Battery Energy Storage Systems Accountability Action Plan

RiSE4EJ is an environmental health and justice organization dedicated to advancing community-led solutions, resisting chemical exposures, and dismantling environmental racism, primarily serving fenceline and overburdened communities. RiSE4EJ supports a transition from fossil fuels to clean energy that is based on community needs, aimed at reducing cumulative impacts in overburdened communities.

First and foremost, we appreciate Accelergen's commitment to being a good neighbor, transparent, and accountable to the local community. East Side Battery has shown a commitment to engaging with the community and considering the recommendations of local residents. We commend these efforts and appreciate their responsiveness to our concerns and feedback.

Because the issues around electrification, battery storage, and power sector are cumulative and do not impact communities in a silo, RiSE4EJ developed recommendations that reflect the importance of a holistic approach for safe development.

Equity in Energy Decisions

As the clean energy transition occurs, RiSE4EJ is committed to ensuring it is a just transition. The vision for a just transition is informed by decades of frontline struggle for

energy democracy, the long-term fight for equity, accountability, and local control over energy systems. A just transition focuses on identifying and rectifying the adverse health, environmental, and economic impacts of fossil energy and making sure clean energy doesn't follow industry patterns of extraction. It involves grassroots organizing to reverse historical marginalization and demands a just transition to equitable, clean energy solutions.

When implementing new clean energy projects, we must consider environmental justice impacts and priorities from cradle to grave. The unintended consequences of the implementation of clean energy technologies must be planned through, such as the waste stream. Battery energy storage systems and electrification must be accompanied by standards and regulations around renewable electricity generation, i.e., wind and solar, that will not further burden environmental justice communities. Decisions on siting new electricity infrastructure must be coordinated with environmental justice leaders to ensure cumulative impacts, health effects, and energy burden are addressed.

Public Health Benefits of Clean Energy

Kansas City is already living with the consequences of poor air quality. In 2025, the region again violated the national ambient air quality standard for ozone, extending a troubling multi-year pattern that underscores the need for stronger action (Mid-America Regional Council [MARC], 2026). These regional air-quality problems do not fall evenly across the metro, but instead compound longstanding neighborhood-level inequities in exposure and health risk. Communities located near highways, rail corridors, and industrial facilities have faced disproportionate exposure to environmental burdens for decades. Research demonstrates that pediatric asthma burden in Kansas City is not evenly distributed and is significantly associated with proximity to local pollution sources, underscoring that air pollution here is also an environmental justice issue (Friedman et al., 2024). Present-day pediatric asthma disparities in Kansas City remain linked to patterns of historic racism and neighborhood disinvestment, reinforcing that current health inequities did not arise by chance and should not be treated as disconnected from infrastructure and land-use decisions (Friedman et al., 2022).

Frontline community members face the compounding burdens of hazardous air pollutants and heat warming emissions such as black carbon, produced by the incomplete combustion of fossil fuels, biofuels and biomass, causing severe cardiovascular disease and respiratory health. The increasing frequency and severity of disasters hit these communities hardest, which are more likely to have inadequate infrastructure and insurance coverage, increased risk of cascading disasters from nearby industrial facilities, and lower levels of reinvestment after these events (Patnaik et al., 2020).

The public-health value of electrification and battery energy storage should be understood as part of a broader strategy to reduce combustion-related pollution, lower cumulative exposure, strengthen resilience during outages and extreme weather, and deliver cleaner, more reliable energy benefits to overburdened communities that have historically received the least protection and faced the greatest harm (MARC, 2026; Friedman et al., 2024; García et al., 2025). At the grid scale, BESS can help reduce dependence on fossil fuel peaker plants, that are often located near disadvantaged communities and contribute to harmful air pollution exposures, by storing electricity and discharging it during periods of high demand (Tarekegne et al., 2022).

The public health benefits of electrification are also supported by broader evidence showing that cleaner electricity systems can improve air quality and reduce pollution-related illness and death. In a 2024 study, researchers found that renewable electricity adoption combined with electrification pathways could reduce ambient PM2.5 concentrations and generate substantial public health benefits, largely through prevention of premature mortality. Although the study is not limited to battery storage alone, it is directly relevant because energy storage is a key enabling technology for integrating more renewable electricity into the grid while maintaining reliability (Li et al., 2024).

BESS can also improve health by providing backup power during outages. This is particularly important for older adults, people with chronic illnesses, households with electricity-dependent medical equipment, and residents exposed to extreme heat or cold during grid disruptions (Kallay et al., 2021). Resilient power systems, ideally batteries paired with solar photovoltaics, can provide clean and reliable backup power and help protect medically vulnerable populations during climate-induced outages (Mango et al., 2021). In this way, building-level storage can support continuity of care, refrigeration for medications, cooling, communication, and other essential needs that directly affect health and safety.

BESS may also support public health indirectly by helping reduce energy burden when paired with rooftop solar, community solar, or other affordability-oriented clean energy strategies. High energy burden is a public health and environmental justice concern because households with disproportionate utility costs may be forced to choose between energy, food, healthcare, and other necessities (Singla, 2022). In Armourdale, community leaders reported that high energy burdens and unreliable access to affordable energy were key community concerns, and that community-centered solar and storage strategies could support affordability, resilience, and local control (García et al., 2025).

The reliability and affordability benefits of storage are also reflected in federal energy planning. The U.S. Department of Energy (2023) notes that distributed energy

resources, including batteries, can reduce reliance on natural gas peaker plants, improve reliability, reduce strain on infrastructure, and lower energy cost burdens on consumers when effectively integrated through systems such as virtual power plants. From a public health standpoint, these functions matter because they can reduce exposure to combustion-related emissions while improving household and community resilience during emergencies and extreme weather.

At the same time, the public health case for BESS depends on how projects are designed, sited, and governed. Benefits are strongest when BESS is used to displace fossil fuel combustion, lower pollution exposure, and support vulnerable residents and critical community facilities. They are weaker, and potentially undermined, if projects are poorly sited or if safety planning is inadequate. The U.S. Environmental Protection Agency (2025) recommends that BESS projects comply with applicable siting and zoning requirements, follow key safety standards, coordinate with local emergency responders, and include clear emergency response planning and community communication measures. These safeguards are essential to ensuring that electrification infrastructure advances public health rather than shifting new risks onto already overburdened neighborhoods (U.S. Environmental Protection Agency, 2025).

One of the major risks to public health that BESS may pose is a thermal runaway fire. A thermal runaway fire can occur when a battery overheats in a self-feeding way until it catches fire or explodes and releases toxic gases and particulate matter (Bugryniec et al., 2024). A BESS facility in Moss Landing, California experienced a thermal runaway fire that led to surveyed community members reporting the following symptoms: headache (59.5%), sore throat (54.5%), cough (48.7%), itchy eyes (44.4%), a metallic taste in their mouth (38.7%), fatigue (34.4%), or congestion (32.9%) (County of Monterey Health Department & County of Santa Cruz Health Services Agency, 2025). While the BESS facility in Moss Landing used Nickel Manganese Cobalt batteries, a chemistry that carries a relatively higher risk of thermal runaway, all lithium-ion batteries carry some risk of thermal runaway.

RiSE4EJ gathered recommendations to make sure that clean energy projects, including BESS developments, prioritize community safety and wellbeing, especially in communities that have historically faced the greatest environmental and health burdens.

Accountability Plan

RiSE4EJ is committed to a transition to renewable energy, but projects must be scaled to local environmental priorities and social needs, and planned and run through community-led processes (Figueroa-Helland, 2026). Battery energy storage systems should be designed to support renewable energy integration and minimize emissions by prioritizing charging from renewable generation rather than fossil-fuel-based sources. Developers should also account for lifecycle impacts, including the environmental and

community effects of battery manufacturing and mineral sourcing, in their commitment to zero emissions. BESS should protect the safety, health, and well-being of surrounding communities in a precautionary approach while respecting their right to self-determination (Goldstein, 2001). Accordingly, we provide recommendations on community partnerships, labor practices, safety, emergency planning, and decommissioning.

Community Partnerships: Transparency, Inclusivity, and Accessibility

Authentic and equitable collaborative partnerships only work with transparency, accountability, inclusivity, and mutual respect towards environmental justice and environmental stewardship at all levels throughout the lifetime of the project. Developers must establish meaningful community engagement practices that focus on frontline community voices and accommodate and facilitate the ability for community members and frontline workers to fully participate in the process. To achieve this, we offer the following recommendations:

- Grassroots and frontline community-led organizations must be put in positions to lead in stakeholder and public engagement efforts.
- Community must be represented at a larger percentage than industry, corporations, and businesses in all stakeholder groups.
- Frontline communities and EJ groups must have full access to all information, research, and data throughout the project lifecycle.
- During permitting processes, sufficient time and accommodations must be made to allow for all stakeholders to read permit applications and participate in the process.
- Provide public access to key staff and decision-makers through regular meetings and ongoing availability to address questions and concerns. Ensure meetings are scheduled at times and locations that are accessible and convenient for community members.
- Establishing a community advisory that is representative of the community and includes youth through the lifetime of the project and decommissioning process.
- Support community-led research efforts and data collection that demonstrate the impacts associated with BESS programs and initiatives.

Labor Recommendations

Clean energy projects must make sure those most in need are receiving the economic benefits of a clean energy transition. A just transition should bring quality careers and not displace workers. A way to achieve this is by partnering with communities, labor groups, and others to develop workforce development programs and apprenticeships to ensure that workers are prepared to fill jobs created by the transition, which can be accomplished by:

- Embedding workforce requirements into project delivery by setting local hiring targets, funding training as part of project budgets, and tying contractors to clear workforce expectations.
- Using project agreements to formalize outcomes, including community workforce agreements, and project labor agreements
- Building direct pipelines to jobs by partnering with workforce development agencies, educational institutions, unions, and community based organizations to create pre-apprenticeship and apprenticeship pathways to a zero emission economy
- Expanding access to jobs by working with community-based organizations to recruit and place workers from underrepresented groups, such as at-risk youth, displaced workers, veterans, the formerly incarcerated, and others facing barriers to employment, and communities near project sites.
- Prioritizing direct hiring instead of relying on third-party logistics firms and temporary staffing agencies. Even with strong workforce standards, third-party staffing can weaken enforcement or dilute accountability in the form of decreased wages for workers, lack of access to benefits, and precarious work structures that make it more difficult to organize for better working conditions.
- Supporting worker transition and retention through targeted upskilling and retraining opportunities that allow existing workers to move into clean energy roles.

Across the country, worker centers, labor programs, unions, etc. are developing worker rights recommendations which include standards that are necessary to protect workers. Below are some of the recommendations (Gross, 2007; Ruckelshaus et al., 2014; Scott, 2021):

- First Source Hiring : Developers should prioritize interviewing and hiring local, economically disadvantaged, or unemployed residents for new jobs. This should include construction as well as operation and maintenance.
- Living Wage: all jobs, including work performed by contractors, temp services, and tenants, should earn livable wages, indexed for inflation, as well as full benefits for full-time employees.
- Paid Sick Days: all jobs at a site, including work performed by contractors, temp services, and tenants, should have access to paid sick days
- Health & Safety Committee: All parties share a sense of responsibility to the community and workplace health and safety. As such, a health and safety committee should be formed and meet quarterly to address those needs, as well as labor conditions in general.

BESS Safety Recommendations

Based on the Kansas City context, we adapted the recommendations developed by Never Again Moss Landing informed by their experience with a BESS fire (Never Again Moss Landing, 2026).

1. Only allow outdoor battery energy storage systems
2. Conduct Fire Safety Inspection sequence by an independent 3rd party and local fire department before approval is given for the operator to begin energy storage.
    a. of the to-be-built blueprints of the designed storage layout,
    b. of the as-built outdoor storage layout blueprint, showing changes from the original layout design
    c. of the built energy storage layout (National Fire Protection Association, 2026).
3. The BESS operator must inform and coordinate with the county permitting body, as well as fire and emergency response agencies on how to handle/respond to the worst-case uncontrollable thermal runaway fire scenario.
4. The BESS operator must conduct an environmental impact review (EIR) and then inform and coordinate with the county permitting body and health department about the risks to the public and sensitive environmental sites for the worst-case uncontrollable thermal runaway fire scenario.
5. The outer edge of battery storage containers must be set back at least a 1,000 feet from the following local sites: hospitals, care centers, schools, residences, and environmental preserves or sanctuaries.
6. The BESS operator must use an energy storage battery or mechanism safer than NMC lithium-ion batteries. The specific BESS chemistry used (including specific types of lithium-ion chemistries) should be transparently shared with agencies, fire departments, and the public.
7. The BESS operator cannot install or operate zero-separation islands with shoulder-to-shoulder, double-stacked, and double-backed racks.
8. A robust fire safety strategy requires a multi-layered approach involving prevention, suppression, and physical containment.
9. The operator must conduct an operational test and report the results of the fire suppression water system and water funneling network to the water suppression containment tanks.
10. The BESS must include spectroscopic devices to instantly identify and quantify toxic gases during a thermal runaway event (Yan et al., 2025).
11. To prevent dangerous degrading of operational batteries, operator should share a monthly report to the fire and county emergency response agencies including Transparent Real-time Independent Monitoring (TRIM) for loading levels, above

80% and below 20% of individual batteries, and highlighting concerning degradation and batteries that should be removed from storage

Emergency Operations Plan

A copy of the approved Emergency Operations Plan shall be publicly available for the local fire department, local fire code officials, and the community. A permanent copy shall also be placed in an approved location to be accessible to facility personnel, fire code officials, and emergency responders. The emergency operations plan shall include the following information:

- Procedures for safe shutdown, de-energizing, or isolation of equipment and systems under emergency conditions to reduce the risk of fire, electric shock, and personal injuries, and for safe start-up following cessation of emergency conditions.
- Procedures for inspection and testing of associated alarms, interlocks, and controls.
- Procedures to be followed in response to notifications from the Battery Energy Storage Management System, when provided, that could signify potentially dangerous conditions, including shutting down equipment, summoning service and repair personnel, and providing agreed upon notification to fire department personnel for potentially hazardous conditions in the event of a system failure.
- Emergency procedures to be followed in case of fire, explosion, release of liquids or vapors, damage to critical moving parts, or other potentially dangerous conditions. Procedures can include sounding the alarm, notifying the fire department, evacuating personnel, de-energizing equipment, and controlling and extinguishing the fire.
- Response considerations similar to a safety data sheet (SDS) that will address response safety concerns and extinguishment when an SDS is not required.
- Procedures for dealing with battery energy storage system equipment damaged in a fire or other emergency event, including maintaining contact information for personnel qualified to safely remove damaged battery energy storage system equipment from the facility.
- Other procedures as determined by the community advisory and government bodies to provide for the safety of occupants, neighboring properties, and emergency responders.
- Procedures and schedules for conducting drills of these procedures and for training local first responders on the contents of the plan and appropriate response procedures.
- Extend safety signage requirements beyond the BESS unit itself to include perimeter fences or security barriers and include a map of the site, BESS enclosures, and associated equipment.
- Include a requirement for an Emergency Response Plan (ERP) and annual local first responder training every BESS installation.

It is critical that this information be accessible outside the fence line of the project for the health and safety of first responders. All relevant hazard warnings indicated on signage or maps should identify and display isolation distances response personnel should maintain from BESS involved in fire or where there may be a risk of explosion or deflagration.

Decommissioning Plan

Kansas Senate Bill 131 (2025), as introduced, would classify commercial battery energy storage systems as “large energy facilities” and would require a code of conduct permit before construction in rural areas, along with decommissioning plans and adequate financial assurance to ensure infrastructure removal and land restoration if a project is retired or abandoned. Although the bill was referred to the Senate Committee on Utilities and does not appear to have advanced further during the 2025 session, it still illustrates a relevant policy principle for Kansas City where energy storage projects should plan through their full life cycle.

Developers must submit a decommissioning plan, developed in accordance with the stakeholder community input, to be implemented upon abandonment and/or in conjunction with removal from the facility. The decommissioning plan shall include:

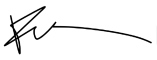
- A narrative description of the activities to be accomplished, including who will perform that activity and at what point in time, for complete physical removal of all battery energy storage system components, structures, equipment, security barriers, and transmission lines from the site;
- Disposal of all solid and hazardous waste in accordance with local, state, and federal waste disposal regulations;
- The anticipated life of the battery energy storage system;
- The estimated decommissioning costs and how said estimate was determined;
- The method of ensuring that funds will be available for decommissioning and restoration;
- The method by which the decommissioning cost will be kept current;
- The manner in which the site will be restored, including a description of how any changes to the surrounding areas and other systems adjacent to the battery energy storage system, such as, but not limited to, structural elements, building penetrations, means of egress, and required fire detection suppression systems, will be protected during decommissioning and confirmed as being acceptable after the system is removed; and A listing of any contingencies for removing an intact operational energy storage system from service, and for removing an energy storage system from service that has been damaged by a fire or other event.

The owner and/or operator of the energy storage system, shall continuously maintain a fund or bond for the removal of the battery energy storage system and restoration of the land, for the period of the life of the facility. All costs of the financial security shall be borne by the owner and/or operator.

Conclusion

RiSE4EJ maintains that project approval requires strict, binding, and transparent safeguards. We call for accountable processes characterized by regular, community-led reviews. Centering public health and protecting the residents who will live with long-term consequences is not a hindrance to development; it is a foundational requirement. We must ensure that growth does not exacerbate existing inequities or externalize costs onto overburdened communities.

Respectfully,



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