

Scoping comment — Stand-alone BESS Programmatic EIS (Publication 26-06-017)

To the Department of Ecology, Clean Energy Coordination:

My name is Jesse Skorupa and I live at 35312 SE Kinsey St. I am writing to submit a scoping comment on the Programmatic Environmental Impact Statement for stand-alone, utility-scale, lithium-ion battery energy storage system facilities in Washington (Publication 26-06-017).

I am commenting because a stand-alone BESS facility is proposed in the Snoqualmie Valley, and Ecology has said that project-level reviews will tier to this PEIS. What the study leaves out now will be harder to add back later. Ecology has asked for input on four questions: what facilities to evaluate, what geographic assumptions to use, what impacts to analyze, and what mitigation to consider. My comment addresses the following:

Q2 · Geographic scope — Where the study assumes batteries will go.

Being near a substation should not make a place “suitable.” I ask that closeness to existing infrastructure not be used as a stand-in for a safe site. Nearly every kind of land is in play, so the study’s map has to say where facilities should not go, not only where they could. I ask that the PEIS’s geographic-scope assumptions explicitly account for proximity to homes, schools, and hospitals; wildland-urban interface and wildfire-prone areas; seismic hazard zones and floodplains; areas dependent on private wells; and communities with limited evacuation routes — and that proximity to existing infrastructure not be treated as a proxy for suitability.

Q3 · Impacts to analyze — The harms the study has to look at.

Ecology notes toxic gas from a battery fire can hurt firefighters. Neighbors have no protective gear. I ask that the study model what a battery fire’s smoke does to the people living nearby.

Indirect and cumulative effects are in scope. I ask that the study cover smoke that settles into valleys, runoff that reaches wells and streams later, and several facilities on the same stretch of grid. I ask that the PEIS analyze, for stand-alone facilities: thermal-runaway fires and hazardous-gas emissions (including hydrogen fluoride) with dispersion modeling for inversion-prone valleys; contaminated fire-suppression water and its path to groundwater, private wells, and fish-bearing streams; multi-day incident demands on local fire, HazMat, hospital, and evacuation capacity;

continuous nighttime noise from cooling and inverters at distances beyond 1,000 feet; and seismic performance of container-based installations in mapped fault zones.

This is personal for my household. I live under 1 mile from the proposed site. My children go to school nearby, at Cascade View Elementary School. In an emergency my household would evacuate via Snoqualmie Parkway, along with everyone else who depends on that road.

Because Ecology itself says stand-alone facilities “could be sited in a variety of locations,” including near cities, the PEIS should not assume facilities will be far from people. I ask that Ecology treat proximity to residents as a defining condition of the analysis, and that the Draft PEIS state plainly which impacts cannot be mitigated below significance, so that lead agencies and the public are not left to guess.

Thank you for considering this comment. Please include it in the scoping record. Our community is following this PEIS closely and intends to participate in the Draft PEIS comment period.

Sincerely,
Jesse Skorupa
35312 SE Kinsey St