

SCOPING COMMENT

Programmatic Environmental Impact Statement for Stand-Alone, Utility-Scale Lithium-Ion Battery Energy Storage Systems Publication 26-06-017

Submitted to: Washington State Department of Ecology, Clean Energy Coordination

Submitted by: Henrika Stich

Address: 36702 SE Gravenstein Ct.

Subject: Formal Scoping Comment on the Programmatic Environmental Impact Statement

To the Department of Ecology, Clean Energy Coordination:

My name is Henrika Stich, and I reside at 36702 SE Gravenstein Ct. I respectfully submit this scoping comment concerning the Programmatic Environmental Impact Statement (PEIS) for stand-alone, utility-scale lithium-ion battery energy storage system (BESS) facilities in Washington, identified as Publication 26-06-017.

This comment is submitted because a stand-alone BESS facility has been proposed in the Snoqualmie Valley, and the Department of Ecology has indicated that subsequent project-level environmental reviews will tier from this PEIS. Because Ecology has requested public input regarding the questions and matters that should be addressed in the study, I request that the scope of the PEIS include the issues set forth below.

Q1. Facility Types: Categories of Battery Facilities to Be Evaluated

The PEIS should evaluate stand-alone BESS facilities proposed near residences and other sensitive receptors, rather than limiting its analysis to remote facilities of the type previously studied. Ecology has acknowledged that these facilities may be smaller and “could be sited in a variety of locations.” Accordingly, the study should encompass the largest containerized installations currently being proposed near residential neighborhoods and should not be limited to small battery installations located at substations.

The PEIS should depict and evaluate the reasonably foreseeable configuration of multiple container-sized battery units located near homes and schools, because such configurations are currently being proposed and are consistent with Ecology’s own description of these facilities. The analysis should evaluate facilities as constructed pursuant to the codes and standards presently adopted in Washington and should expressly identify how more recent safety standards would alter the anticipated risks and impacts, particularly in light of Ecology’s acknowledgment that the State fire code does not incorporate the most current standards.

The PEIS should identify the safest current standard and evaluate it as the appropriate mitigation baseline for all facilities, recognizing that local safety requirements vary among jurisdictions. The analysis should rely upon independent safety data and should treat evacuation, displacement, environmental remediation, and cleanup as impacts in their own right, rather than limiting the assessment to the occurrence of a fire or relying primarily upon failure data produced by an industry-funded research institution.

For these reasons, I request that the PEIS evaluate the full range of stand-alone facilities reasonably anticipated to be proposed in Washington, including large, container-based lithium-ion installations

located near residences, schools, and constrained transportation networks. The PEIS should analyze such facilities under the codes adopted by Washington, rely upon independent safety data rather than industry assurances, and identify compliance with the most recent safety standards as required for mitigation.

Q2. Geographic Scope: Siting Assumptions and Areas to Be Evaluated

The PEIS should define “suitable” areas by reference to public safety and the protection of affected communities, not merely by whether a facility can be physically constructed at a particular location. Proximity to existing electrical infrastructure, including substations, should not be treated as a substitute for a site-specific determination of suitability and safety.

The geographic analysis should identify locations where stand-alone BESS facilities should not be sited, rather than only mapping locations where development may be technically feasible. The conditions present in the Snoqualmie Valley should be included in the study’s geographic assumptions before Ecology establishes the final study area. Those assumptions should screen for locations involving private wells, floodplains, seismic faults, and residential communities dependent upon limited evacuation routes, particularly because detailed site-specific conditions may otherwise be deferred to later project-level review.

The geographic analysis should also account for wildfire exposure and the capacity of local fire districts. Ecology’s prior studies identified wildfire risk associated with “new ignition sources in remote locations with limited response capabilities.” Ecology has also committed to receiving input from local communities. Accordingly, the PEIS should consider the knowledge and concerns of the residents who would be directly affected by these siting decisions.

I therefore request that the PEIS expressly account for proximity to homes, schools, and hospitals; wildland-urban interface and wildfire-prone areas; mapped seismic hazard zones and floodplains; areas dependent upon private wells; and communities with limited evacuation routes. Proximity to existing infrastructure should not, by itself, be deemed evidence that a site is suitable.

Q3. Environmental Impacts Requiring Full Analysis

The PEIS should provide a complete and substantive analysis of responder training needs, fires that are difficult to extinguish, toxic air emissions, impacts on water and fish, and post-incident remediation and cleanup. These matters should not be addressed only in passing, particularly because Ecology’s scoping document states that the PEIS “will evaluate” each of them.

The PEIS should model the dispersion and public-health consequences of smoke and hazardous gases generated by a battery fire for persons residing near a facility. Although the scoping document recognizes that toxic gases released from damaged batteries may injure firefighters’ skin and lungs, neighboring residents have no protective equipment and may be unable to evacuate promptly. Evacuation, displacement, and offsite remediation should therefore be evaluated as separate and material impacts. Ecology’s own example involving the Moss Landing fire states that 1,200 people were displaced from their homes.

The PEIS should evaluate continuous and maximum nighttime noise at the nearest residence, rather than solely at the facility boundary. Ecology’s prior studies found that noise associated with these facilities may extend 1,000 feet in quiet rural areas. The PEIS should also evaluate the operational burden that a multi-day battery fire would place upon local fire, hazardous-materials response,

hospital, and evacuation capacity, particularly where Ecology has not determined whether the resulting burden on small rural fire districts can be adequately mitigated.

At a minimum, the PEIS should analyze: (1) thermal-runaway fires and hazardous-gas emissions, including hydrogen fluoride, using dispersion modeling appropriate for inversion-prone valleys; (2) contaminated fire-suppression water and its potential migration to groundwater, private wells, and fish-bearing streams; (3) demands created by multi-day incidents upon local fire, HazMat, hospital, and evacuation resources; (4) continuous nighttime noise from cooling equipment and inverters at distances exceeding 1,000 feet; and (5) the seismic performance of container-based installations located within mapped fault zones.

Q4. Mitigation Measures

The PEIS should identify specific, measurable, and enforceable mitigation measures capable of incorporation into project permits. Mitigation described only “at a high level” would not provide local jurisdictions with sufficiently definite standards for permit conditions or enforcement. Because local reviewing agencies are expected to rely upon the PEIS when evaluating individual projects, its recommended protections should be sufficiently precise to establish objective requirements for project applicants.

The siting and design recommendations should include minimum protective setbacks from homes, schools, hospitals, and drinking-water wells, supported by evidence demonstrating that the distances are protective of the surrounding community. General guidance, without measurable criteria, is insufficient. The PEIS should also recommend large-scale fire testing for every facility, regardless of whether Washington has yet adopted the latest code edition, because Ecology has recognized that such testing reduces risk.

The PEIS should further make clear that any statewide siting, design, or operational standards establish minimum requirements only and do not preempt or otherwise restrict a local jurisdiction from imposing more protective measures when warranted by site-specific conditions. State standards should therefore operate as a regulatory floor, not a ceiling. In addition, the PEIS should recommend enforceable, developer-funded obligations for ongoing environmental and safety monitoring, post-incident investigation and remediation, financial assurances for cleanup, and decommissioning security, including bonds or equivalent instruments sufficient to ensure that the costs of closure, removal, restoration, and remediation are borne by the facility owner or operator rather than affected communities or public agencies. Such financial-assurance measures should be evaluated in light of analogous requirements applicable to other energy facilities under existing state regulatory programs.

The PEIS should specify the measures necessary to reduce wildfire and emergency-response impacts, including fully funded training and equipment for local responders before a facility becomes operational. Where a material impact cannot be reduced to an acceptable level, including a fire beyond the containment capacity of a small rural fire district, the PEIS should clearly identify that impact as unavoidable rather than presuming that mitigation will be adequate.

I therefore request that the PEIS identify, at a minimum, the following mitigation requirements: minimum setbacks from homes, schools, hospitals, and drinking-water wells; large-scale fire testing in accordance with UL 9540A; compliance with the current edition of NFPA 855 regardless of State adoption status; funded emergency-response plans, training, and equipment for local fire districts before operation; containment and lawful disposal plans for contaminated fire-suppression water;

enforceable nighttime noise limits measured at the nearest residence; and enforceable decommissioning and financial-assurance requirements.

Site-Specific Community Considerations

The matters identified above directly affect my household. My residence is located less than one mile from the proposed site. My children attend Snoqualmie Middle School nearby. In the event of an emergency, my household would be required to evacuate by way of Snoqualmie Parkway, together with other residents who depend upon the same roadway.

Because Ecology has stated that stand-alone facilities “could be sited in a variety of locations,” including locations near cities, the PEIS should not assume that these facilities will be remote from population centers. Proximity to residents should be treated as a defining condition of environmental analysis. The Draft PEIS should clearly identify any significant impacts that cannot be reduced below the applicable significance threshold so that lead agencies and the public are not left to speculate regarding the nature or severity of unresolved impacts.

Request for Inclusion in the Scoping Record

Thank you for considering this comment. I respectfully request that it be included in the official scoping record. The affected community is closely following the development of this PEIS and intends to participate in the public-comment process for the Draft PEIS.

Respectfully submitted,

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