Teresa Bechtold

To the Department of Ecology, Clean Energy Coordination:

My name is Teresa Bechtold and I live at 35328 SE Kinsey Street, Snoqualmie, WA. 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 near where I live, and Ecology states project-level reviews will tier to this PEIS. Ecology asked for input on questions for the study. My comment addresses geographic scope and what studies should be required:

Q2 · Geographic scope — The Ecology study should define "suitable" areas by what is safe for the people who live there. Proximity to existing substations should not be used as a stand-in for a safe site. Existing substations weren't built for energy storage: they were built to translate high voltage into lower voltage usable by homes, schools, and small businesses. The study's map should clearly say where facilities should not go, and eliminate places with private wells, floodplains, earthquake faults, and neighborhoods with limited evacuation routes. Wildfire exposure and fire-district capacity should be part of the map, since Ecology's own earlier studies flagged wildfire risk from "new ignition sources in remote locations with limited response capabilities." The PEIS's geographic-scope assumptions should 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. Proximity to existing infrastructure isn't a proxy for suitability.

Q3 · Impacts to analyze — Adequate equipment and trained experts to extinguish industrial fires and evacuate all people from the toxic plume with at least two evacuation routes from the site should be fully analyzed and independently verified. Similarly, contamination of drinking water and riparian habitat should be fully analyzed. Ecology's scoping document states it "will evaluate" each of those areas but doesn't demand independent scientific data specific to the proposed site. Ecology's study should model what a battery fire's smoke does to the people and wildlife living nearby. Ecology acknowledges toxic gas from damaged batteries can hurt firefighters' skin and lungs. It does not mention residents who have no protective gear and may not be able to escape. Evacuation, displacement, and offsite cleanup should count as impacts in their own right. Ecology's own example, the Moss Landing fire, forced 1,200 people from their homes in 2025 and forced people from their homes again when it reignited in 2026 during EPA cleanup. Nighttime noise should be measured at the nearest homes; Ecology's earlier studies found that noise from these facilities reaches 1,000 feet in quiet rural areas. For stand-alone facilities the PEIS should analyze: thermal-runaway fires and hazardous-gas emissions (including hydrogen fluoride) with dispersion modeling, including 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 near a site where a stand-alone BESS facility is proposed.

My household depends on Railroad Ave / SR 202, which is also an emergency route for everyone along it. Our neighborhood suffered severe flooding in December, 2025 and couldn't flee a toxic plume the BESS envisioned in Ecology's draft produces.

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.

Thank you for considering how best to protect our environment and include this comment in the scoping record.

Kind regards,
Teresa Bechtold
35328 SE Kinsey Street, Snoqualmie, WA