Nikki Bragg

To the Department of Ecology, Clean Energy Coordination:

My name is Nikki Bragg, and I live at 36427 SE Woody Creek Lane in Snoqualmie, Washington. I am writing to submit a scoping comment on the Programmatic Environmental Impact Statement (PEIS) for stand alone, utility scale, lithium-ion battery energy storage system (BESS) facilities in Washington (Publication 26-06-017).

I am submitting this comment because a stand alone BESS facility is proposed near my home. Because the Department of Ecology has indicated that future project level environmental reviews will tier to this PEIS, I believe it is especially important that the PEIS fully address the concerns of communities that may ultimately live alongside these facilities.

The Department of Ecology has asked for input on several questions as part of the scoping process. My comments below address Questions 2, 3, and 4.

Q2 · Geographic Scope — Where the Study Assumes Batteries Will Go

I believe the geographic scope of this study needs to look beyond where a BESS facility can physically be built and consider where it can be safely located in relation to the people and communities around it.

Proximity to existing infrastructure should not be treated as a stand in for a safe or suitable site. Being near a substation, for example, should not automatically make an area "suitable." The Department of Ecology study should define suitable areas based on the conditions that affect the safety of the people who live there, not simply on whether a facility could be connected to the grid.

Conditions such as those found in the Snoqualmie Valley should be part of this analysis. This is the opportunity to shape the study area before the Department of Ecology establishes the assumptions that will guide later project level reviews. The geographic assumptions should therefore screen for locations with private wells, floodplains, earthquake faults, neighborhoods with limited access, and other conditions that could significantly affect the consequences of a BESS incident.

Wildfire exposure and local fire district capacity also need to be part of the geographic analysis. The Department of Ecology's own earlier studies identified wildfire risk associated with "new ignition sources in remote locations with limited response capabilities." That concern is particularly important when considering communities where emergency response resources may already be limited.

The Department of Ecology has committed to hearing from local communities. I believe that means taking seriously what residents know about the places where we live, including the characteristics that may not be apparent from a statewide infrastructure map.

For these reasons, I ask that the PEIS geographic scope assumptions explicitly account for:

1. Proximity to homes, schools, and hospitals;

2. Wildland and urban interface and wildfire prone areas;
3. Seismic hazard zones and floodplains;
4. Areas dependent on private wells; and
5. Communities with limited evacuation routes.

Most importantly, proximity to existing infrastructure should not be treated as a proxy for suitability.

Q3 · Impacts to Analyze — The Harms the Study Needs to Examine

I am particularly concerned that the PEIS fully examine what a battery fire could mean for the people living nearby, not only for firefighters responding to the incident.

The scoping document acknowledges that toxic gases released from damaged batteries can harm firefighters' skin and lungs. However, nearby residents are also potentially exposed, and unlike firefighters, they do not have protective equipment, cannot hermetically seal homes or businesses, or necessarily have the ability to leave immediately.

The study should therefore model what battery fire smoke means for the people living in the surrounding community. This should include dispersion modeling under conditions such as nighttime inversions and valley geography, where smoke and hazardous gases may not disperse as they would in an open or well ventilated setting.

Noise is another impact that deserves more careful consideration. The study should measure nighttime noise at the nearest residence, rather than simply at a property or facility boundary. The Department of Ecology's earlier studies found that noise from these facilities can reach 1,000 feet in quiet rural areas. The people and pets experiencing that noise are the residents who live nearby, so the analysis should reflect that reality.

The PEIS should also examine what a multi-day battery fire could demand from local fire, HazMat, hospital, and evacuation resources. This is particularly important for smaller rural fire districts. The Department of Ecology has previously been unable to say whether the burden placed on small rural fire districts can always be addressed, and that uncertainty should not be left for individual communities to discover only after a project is proposed.

I would like to see the study thoroughly examine the direct, indirect, and cumulative effects of:

1. Smoke and hazardous gases settling or being trapped in valleys;
2. Fire suppression runoff reaching groundwater, private wells, and streams;
3. Multiple BESS facilities being located along the same stretch of the electrical grid;
4. The ability of nearby residents to evacuate without being exposed to dangerous concentrations of toxic gas; and
5. The ability of local emergency services to respond to a prolonged incident.

The study should properly model whether neighbors can safely and effectively evacuate without breathing dangerous levels of toxic gas in locations such as valleys that can trap air, consistent with what the applicable fire safety requirements are intended to protect against.

I ask that the PEIS specifically analyze, for stand alone facilities:

1. Thermal runaway fires and hazardous gas emissions, including hydrogen fluoride, with dispersion modeling for inversion prone valleys;
2. Contaminated fire suppression water and its potential path to groundwater, private wells, and fish bearing streams;
3. Multi-day incident demands on local fire, HazMat, hospital, and evacuation capacity;
4. Continuous nighttime noise from cooling systems and inverters at distances beyond 1,000 feet; and
5. Seismic performance of container based installations in mapped fault zones.

Q4 · Mitigation — The Steps the Department of Ecology Should Require to Reduce Harm

I also believe the PEIS needs to be specific enough that local governments and communities have meaningful standards to rely on when an actual project comes before them. My county may ultimately depend on the findings and mitigation measures in this PEIS when reviewing a proposed facility, so the recommendations need to be concrete and enforceable rather than simply general guidance.

The siting and design considerations the Department of Ecology develops for project proponents should include minimum distances from homes, schools, hospitals, and drinking water wells that are demonstrated to provide meaningful protection for surrounding communities.

The study should also recommend that large scale fire testing be required for every facility, regardless of whether Washington has adopted the newest applicable code, particularly because the Department of Ecology itself credits this testing with reducing risk.

Where a potential impact cannot realistically be mitigated, for example where a fire could exceed the containment capabilities of a small rural fire district, the PEIS should say so plainly and identify that impact as unavoidable rather than leaving the issue for residents and local decision makers to determine on a project-by-project basis.

The study should also clearly state that local governments may require protections stronger than state minimum standards. State standards should serve as a floor, not a ceiling, particularly when local conditions create risks that statewide minimums may not adequately address.

In addition, I ask that the PEIS recommend developer funded monitoring, cleanup guarantees, and decommissioning bonds, consistent with the financial and environmental protections that state rules already require for other energy facilities.

Specifically, I ask that the PEIS identify concrete mitigation measures, including:

1. Minimum setbacks from homes, schools, hospitals, and drinking water wells;
2. Large scale fire testing (UL 9540A) and compliance with the current edition of NFPA 855, regardless of state adoption status;
3. Funded emergency response plans, training, and equipment for local fire districts before a facility begins operation;
4. Containment and disposal plans for contaminated fire suppression water;

5. Enforceable nighttime noise limits measured at the nearest residence; and
6. Decommissioning and financial assurance requirements.

The Impact on My Household and Community

This issue is personal for my household. I live near a location where a stand alone BESS facility is proposed, so these are not abstract concerns to me. They are questions about the safety and quality of life of the community where my family lives.

My household depends on the Snoqualmie Parkway, which is also the emergency route for everyone living along it. The ability of residents to evacuate safely, and the ability of emergency responders to reach us, are therefore very real considerations when evaluating the suitability of a proposed facility.

Because the Department of Ecology itself states that stand alone facilities "could be sited in a variety of locations," including near cities, I do not believe the PEIS should make assumptions that these facilities will generally be located far away from people.

I respectfully ask the Department of Ecology to treat proximity to residents as a defining condition of the analysis. Communities should not have to wait until a project level review happens to discover whether the characteristics of their particular neighborhood create risks that were not adequately considered at the programmatic level.

I also ask that the Draft PEIS clearly identify which impacts cannot be mitigated below significance. The public and local lead agencies should not be left to guess about the remaining risks or whether proposed mitigation is actually sufficient.

Thank you for taking the time to consider my comments and for including them in the scoping record. Our community is following this PEIS closely, and I intend to continue participating in the Draft PEIS comment period.

Sincerely,

Nikki Bragg
36427 SE Woody Creek Lane
Snoqualmie, WA 98065