Sydney Zvara

To the Department of Ecology, Clean Energy Coordination:

My name is Sydney Zvara and I live at 7252 Fairway Ave SE. 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 has said that project-level reviews will tier to this PEIS. Ecology has asked for input on questions for the study. My comment addresses the following:

Q2 · Geographic scope — Where the study assumes batteries will go.
The Ecology study should define "suitable" areas by what is safe for the people who live there, not just by where a facility could physically be built. The study's map should clearly say where facilities should not go, not only where they could, since nearly every kind of land is in play. I ask that Ecology not define "suitable" areas by grid proximity alone, and that the geographic-scope assumptions screen for nearby homes and schools, wildfire exposure, mapped seismic and flood hazards, private-well dependence, and limited evacuation routes.

Q3 · Impacts to analyze — The harms the study has to look at.
It's crucial that responder training, hard-to-extinguish fires, toxic air, harm to water and fish, and cleanup each get a full analysis, not a mention, as the Ecology study scoping document states it "will evaluate" each of them. It's important that the study model what a battery fire's smoke does to the people living nearby. The scoping document acknowledges toxic gas from damaged batteries can hurt firefighters' skin and lungs. It does not mention neighbors, who have no protective gear and may not be able to leave. 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. The study needs to measure nighttime noise at the nearest home, not at the fence line, since Ecology's earlier studies found that noise from these facilities reaches 1,000 feet in quiet rural areas. I ask that the impact analysis cover battery-fire smoke and hydrogen fluoride under valley inversion conditions, fire-suppression runoff reaching wells and salmon streams, the load a multi-day incident puts on rural fire, HazMat, hospital, and evacuation capacity, all-night mechanical noise well past 1,000 feet, and how container-based facilities perform in an earthquake.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed. Our neighborhood children attend school very near a proposed stand-alone BESS site and play at the park that adjoins it. My household depends on Snoqualmie Parkway, which is also an emergency route for everyone along it.

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,
Sydney Zvara
7252 Fairway Ave SE