Elizabeth Vaughan

To the Department of Ecology, Clean Energy Coordination:

My name is Elizabeth Vaughan and I live at 34821 SE Burrows Way, Snoqualmie WA 98065. 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:

Q3 · Impacts to analyze — The harms the study has to look at.
Responder training, hard-to-extinguish fires, toxic air, harm to wildlife (incl. fish), water and cleanup each get a full analysis, as the Ecology study scoping document states it "will evaluate" each of them. The study must model what a battery fire's smoke does to the people and wildlife, living and migrating nearby. The scoping document acknowledges potential harm to firefighters' skin and lungs but does not mention neighbors, who lack protective gear and may not be able to leave. Nor are lingering impacts to water and wildlife considered. Evacuation, displacement, and offsite cleanup should count as impacts in their own right. 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. The study should look at what a multi-day battery fire demands from local fire, hazmat, hospital, and evacuation capacity, since Ecology could not say whether the burden on small rural fire districts can be fixed. 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 near a site where a stand-alone BESS facility is proposed, the Cascadia Ridge project. My household depends on SR 18 and Railroad Ave (SR202), which are emergency routes for everyone along them.

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,

Elizabeth Vaughan
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