Marcia Spani

To the Department of Ecology, Clean Energy Coordination:

My name is Marcia Spani and I live at 35124 SE Kinsey St. 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 Washington is siting stand-alone battery facilities near communities, including one proposed in the Snoqualmie Valley, 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.
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 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. The study should properly model whether neighbors can evacuate without breathing dangerous levels of toxic gas in places such as a valley that traps air, which is what the fire code requires.
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.

Q4 · Mitigation — The steps Ecology should require to reduce the harm.
The siting and design considerations Ecology plans to give developers from the study must include minimum distances from homes, schools, hospitals, and drinking-water wells that are proven to be safe for the surrounding community, not just general guidelines. The study should recommend large-scale fire testing be required for every facility, whether or not the state has adopted the newest code, since Ecology itself credits it with reducing risk. If harm from a BESS facility cannot be fixed, such as a fire that a small rural district cannot contain, the study should say so plainly and label it unavoidable. The study should state that local governments may require stronger protections than the state minimum. State standards should be a floor, not a ceiling.
I ask that the PEIS identify concrete mitigation measures, including minimum setbacks from homes, schools, hospitals, and drinking-water wells; large-scale fire testing (UL 9540A) and 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 disposal plans for fire-suppression water; enforceable nighttime noise limits at the nearest residence; and decommissioning and financial-assurance requirements.

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,
Marcia Spani
35124 SE Kinsey St