

Caitlin Hodges

To the Department of Ecology, Clean Energy Coordination:

My name is Caitlin Hodges and I live in Snoqualmie Ridge. 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 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:

Q1 · Facility types — Which kinds of battery facilities get studied.

I would like the study to look at stand-alone sites near homes like mine, not the remote ones it studied before, since Ecology admits these sites are smaller and "could be sited in a variety of locations." The study should include the largest container-style installations now being proposed near neighborhoods, not just small substation batteries, since Ecology has not yet decided what kind of facility it will study. The study should picture rows of container-sized battery boxes beside homes and schools, because that is what is being proposed and how Ecology itself describes these sites. The study should assume facilities would be built to the rules Washington has actually adopted, and say what the newest standards would change, since Ecology admits the state's fire code is behind them. I ask that the PEIS evaluate the full range of stand-alone facilities actually being proposed in Washington — including large container-based lithium-ion installations sited near homes, schools, and constrained road networks — and that it analyze those facilities as built to the code Washington has actually adopted, drawing on independent safety data rather than industry assurances, and identify the most recent safety standards as required mitigation.

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 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 1–2 miles from the proposed site. My children go to school nearby, at Timber Ridge Elementary. In an emergency my household would evacuate via Snoqualmie Parkway, along with everyone else who depends on that road.

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,
Caitlin Hodges
Snoqualmie Ridge Resident