Marla Gass

To the Department of Ecology, Clean Energy Coordination:

My name is Marla Gass and I live at 7832 Cortland Ave SE, Snoqualmie. I am writingu 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.
It's important that the study model what a battery fire's smoke does to the people, domestic animals and wildlife living nearby. The scoping document acknowledges toxic gas from damaged batteries can do harm to firefighters' lungs and skin. However, it does not consider neighbors, who have NO protective gear and in many instances won't be able to evacuate. Evacuation, displacement, and offsite cleanup should count as impacts in their own right. Ecology's own example of the "Moss Landing" fire that forced 1,200 people from their homes is evidence. In September 2026, "Moss Landing" has suffered yet another event. Even before the September 2026 event they were unsuccessful in their cleanup efforts from the previous fires of January 2025. It is also imperative that a study be done to measure nighttime noise at the nearest homes, NOT at the fence line. Ecology's earlier studies found that noise from these types of facilities can reach 1,000 feet in rural areas. Receiving a full analysis for responder training, hard-to-extinguish fires, toxic air, harm to water and fish, and cleanup, can't be just a mention, as the Ecology study scoping document states it "will evaluate" each of them. 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.

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,
Marla Gass
7832 Cortland Ave SE, Snoqualmie