Nicole Caprice

To the Department of Ecology, Clean Energy Coordination:

My name is Nicole Caprice and I live in Snoqualmie. I am submitting 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). A stand-alone BESS facility is proposed near where I live, and Ecology has said project-level reviews will tier to this PEIS.

1. The study should evaluate large stand-alone facilities as they are actually being proposed in Washington: rows of container-based lithium-ion units located near homes, schools, wetlands, and constrained road networks. It should cover the range of battery chemistries and the largest facility sizes in use, not only smaller installations, and analyze them as built to the code Washington has actually adopted. When assessing failure risk, I ask that the PEIS rely on independent safety data rather than industry assurances, disclose the funding source of every dataset, and identify the most recent safety standards as required mitigation.

2. Proximity to a substation or power line should not make a site "suitable." Ecology's scoping document says it may consider proximity to existing infrastructure, but in many towns that infrastructure sits next to homes, schools, and water supplies. I ask that the PEIS define suitability by safety criteria first: proximity to homes, schools, and hospitals; wildland-urban interface and wildfire-prone areas; seismic hazard zones and floodplains; areas dependent on private wells; and communities with limited evacuation routes. Closeness to the grid can then be a secondary factor.

3. It's important that the study model what a battery fire's smoke does to the people living, working, and visiting nearby. First responder training matters, but the scoping document does not appear to address the everyday people who would be exposed with no protective gear: children in nearby schools, patients in hospitals, and adults in nearby offices. 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 where limited evacuation routes make leaving harder; contaminated fire-suppression water and its path to groundwater, private wells, and fish-bearing streams; multi-day 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.

4. General descriptions of protections "at a high level" are not enough for a county to act on. I ask that the PEIS identify specific, permit-ready measures so cities and counties have clear standards: minimum setbacks from homes, schools, hospitals, and drinking-water wells, based on the study's own smoke and hazard modeling; UL 9540A test results and compliance with the current edition of NFPA 855 regardless of state adoption status; developer-funded emergency-response plans, training, and equipment for local fire districts before operation, maintained for the life of the facility; a facility-specific emergency and evacuation plan completed before permitting, covering nearby schools, hospitals, workplaces, and areas with limited evacuation routes; containment and disposal plans for fire-suppression water; enforceable nighttime noise limits at the nearest residence; and ongoing monitoring, funded cleanup guarantees, and decommissioning bonds, noting where comparable financial assurance requirements already apply to other energy facilities in

Washington.

This is personal for my household. I live near the proposed Cascadia Ridge stand-alone BESS facility, and my children attend school near this proposed site.

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 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,
Nicole Caprice
Snoqualmie