Neil Thibert

To the Department of Ecology, Clean Energy Coordination:

My name is Neil Thibert and I live at 7726 Douglas Avenue SE, 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:

Q1 · Facility types — Which kinds of battery facilities get studied.
The study should include large, container-based lithium-ion installations near residential areas. I would like the study to look at stand-alone sites near homes and neighborhoods, 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 look at 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 Ecology define the facility types studied, and that the analysis assumes the fire codes currently in force in Washington, rely on independent safety data, and call for the newest safety standards as a condition of approval.

Q2 · Geographic scope — Where the study assumes batteries will go.
The Ecology study should define "suitable" areas by what is safe for the people who live there, not just by where a facility could physically be built. Being near a substation should not make a place "suitable." Economics of construction should not replace safety. The study's map should clearly say where facilities should not go, not only where they could, since nearly every kind of land is in play. Conditions like those in the Snoqualmie Valley should be part of what the study considers, because this is the one chance to shape the study area before Ecology draws it. I ask that Ecology not define "suitable" areas by grid proximity alone, and that the geographic-scope assumptions screen for nearby homes and schools, wildfire exposure, mapped seismic and flood hazards, private-well dependence, emergency vehicle access, availability of fire-fighting water, and limited evacuation routes.

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. Shelter-in-place is not an adequate response for a school when a fire can last for days. 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 impact analysis cover battery-fire smoke and hydrogen fluoride under valley inversion conditions, fire-suppression runoff reaching wells and salmon streams, the load a multi-day incident puts on rural fire, HazMat, hospital, and evacuation capacity, all-night mechanical noise well past 1,000 feet, and how container-based facilities perform in an earthquake.

Q4 · Mitigation — The steps Ecology should require to reduce the harm.
I would like the study to name specific, measurable protections a permit can require. Protections described "at a high level" give my county nothing to write into a permit. The study should be specific enough to give local reviewers something to hold a developer to, because my county will lean on it when it reviews a real project. 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. I ask that Ecology name specific mitigation that lead agencies can adopt as permit conditions: real setbacks from homes, schools, and wells; UL 9540A testing and the current NFPA 855 edition; funded training and equipment for local responders before a facility operates; capture and disposal of fire-suppression water; nighttime noise limits measured at the nearest home; and decommissioning bonds.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed, the Cascadia Ridge BESS project. My household depends on Douglas Avenue SE, which is also an emergency route for hundreds of homes and a school. I am a Licensed Civil Engineer, and I offer this comment with that professional background.

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,
Neil Thibert
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