Whitney Schrader

To the Department of Ecology, Clean Energy Coordination:

My name is Whitney Schrader and I live at 7722 Greenridge Ct 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.
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 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. The study should describe the safest current standard and treat it as the baseline for every facility, because safety rules vary from one local government to the next. The study should use independent safety data and count evacuations and cleanup as harms, not only fires, rather than relying on failure data from an industry-funded research institute. I ask that Ecology define the facility types studied to include large, container-based lithium-ion installations near residential areas, and that the analysis assume 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. Closeness to existing infrastructure should not be used as a stand-in for a safe site. Being near a substation should not make a place "suitable." 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. The study's geographic assumptions should screen out places with private wells, floodplains, earthquake faults, and neighborhoods with one road out, because site details will be left to later reviews. Wildfire exposure and fire-district capacity should be part of the map, since Ecology's own earlier studies flagged wildfire risk from "new ignition sources in remote locations with limited response capabilities." I ask that the PEIS's geographic-scope assumptions explicitly account for 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 — and that proximity to existing infrastructure not be treated as a proxy for suitability.

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.

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. The study should detail what it would take to reduce wildfire and fire-response harms, including funded training and equipment for local responders before a facility opens, since Ecology's earlier studies could not say whether they can be reduced enough. 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. 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.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed, the Cascadia Ridge project. My children attend school near a proposed stand-alone BESS site. My household depends on Snoqualmie Parkway, which is also an emergency route for everyone along it.

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,
Whitney Schrader
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