Vasileios Zois

My name is Vasileios Zois, and I am a resident of Snoqualmie, Washington. I am submitting this scoping comment regarding the Programmatic Environmental Impact Statement (PEIS) for stand-alone, utility-scale, lithium-ion battery energy storage system (BESS) facilities in Washington State (Publication No. 26-06-017).

This PEIS directly impacts my family and community. A stand-alone utility-scale BESS facility is currently proposed in the Snoqualmie Valley, in close proximity to residential neighborhoods and Quantum STEM School, which my child attends. Furthermore, our community relies on single-access transit corridors—including SR 202, SR 18, and I-90—which serve as vital daily transit and sole emergency evacuation routes for valley residents.

Because Ecology has explicitly stated that future project-level SEPA reviews will tier to this PEIS, and because stand-alone facilities are increasingly being proposed near populated suburban communities rather than remote industrial zones, this PEIS must evaluate real-world siting conditions. I request that Ecology incorporate the following key parameters into the PEIS scope:

Key Scoping Requests
Q1 · Facility Types & Baseline Standards
The PEIS must evaluate the full operational spectrum of stand-alone, containerized lithium-ion BESS installations as they are actually being proposed in Washington State, specifically those sited near residential neighborhoods, schools, and constrained transportation corridors.

Code Baseline vs. Modern Standards: The PEIS should explicitly model risks based on the building and fire codes Washington has currently adopted, while evaluating updated safety standards—such as the most recent edition of NFPA 855 and full-scale UL 9540A fire testing—as essential, mandatory mitigation measures rather than optional upgrades.

Independent Failure Data: Safety, failure-rate, and thermal runaway analyses must rely on independent, peer-reviewed safety data rather than self-reported or industry-funded research data.

Expanded Definition of Harm: The study must define offsite impacts to include mandatory evacuations, shelter-in-place orders, prolonged community displacement, and hazardous waste remediation—not just direct fire or structural damage.

Q2 · Geographic Scope & Site-Suitability Screening
Suitability must be defined by public health, safety, and environmental protection—not merely electrical grid proximity or land availability.

Exclusionary Screening Criteria: The PEIS geographic scope should establish clear environmental and safety screening thresholds. Siting assumptions must explicitly account for and screen out:

Proximity to high-density residential areas, schools, child-care facilities, and medical centers.

Areas dependent on private drinking-water wells or located within critical aquifer recharge areas.

100-year floodplains, liquefaction zones, and mapped seismic fault lines.

Wildland-Urban Interface (WUI) and fire-prone zones.

Communities with constrained egress or single-road evacuation bottlenecks (such as the Snoqualmie Valley).

Infrastructure Proximity: The PEIS must not treat proximity to existing electrical substations or transmission lines as a proxy for environmental or community suitability.

Q3 · Environmental & Community Impacts to Analyze
The PEIS must model realistic, worst-case catastrophic events and their cascading direct, indirect, and cumulative environmental impacts:

Atmospheric Dispersion & Valley Inversion: Model toxic gas emissions (including Hydrogen Fluoride, Hydrogen Cyanide, and Carbon Monoxide) during thermal runaway events using local atmospheric models that specifically account for valley thermal inversions, where stagnant air traps toxic smoke plumes near ground level.

Offsite Human Health Risks: Evaluate toxic plume exposure for unprotected neighborhood residents and schoolchildren who lack firefighter PPE and may be unable to evacuate due to traffic bottlenecks.

Contaminated Firewater Runoff: Quantify the volume and chemical composition of fire-suppression water required during a multi-day thermal runaway event. Trace its migration path into shallow groundwater, private drinking wells, and local fish-bearing surface waters.

Emergency Response & Infrastructure Strain: Analyze the multi-day operational burden placed on local rural fire districts, HazMat teams, regional hospitals, and evacuation corridors (e.g., SR 202, SR 18, I-90).

Acoustic Environment: Model low-frequency, continuous nighttime noise impacts generated by industrial HVAC units and power inverters at distances exceeding 1,000 feet in quiet rural/suburban baselines.

Cumulative Impacts: Analyze the compounding risks of clustering multiple BESS facilities along the same utility corridor or watershed.

Q4 · Required Mitigation Measures & Regulatory Boundaries
The PEIS must provide concrete, enforceable mitigation strategies that local agencies (such as King County) can rely upon during project-level review:

Mandatory Siting Setbacks: Establish science-based minimum separation distances (setbacks) from homes, schools, hospitals, critical public infrastructure, and drinking-water wells.

Safety Protocols: Require facility-specific UL 9540A unit-, system-, and structure-level fire test data prior to project approval.

First Responder Support: Require developer-funded specialized equipment, continuous HazMat training, and dedicated fire-suppression infrastructure for local fire districts prior to facility commissioning.

Water Containment: Mandate secondary and tertiary containment systems engineered to capture 100% of contaminated firewater and chemical coolant leaks onsite.

Financial Assurance: Recommend developer-funded environmental monitoring, strict liability insurance, and mandatory decommissioning bonds to ensure site remediation without public expense.

Local Authority: State clearly that state standards represent a regulatory floor, not a ceiling, and that local jurisdictions retain the authority to enforce stricter local zoning, noise, and safety protections.

Unavoidable Adverse Impacts: Where impacts cannot be mitigated below significance (such as a catastrophic fire exceeding rural response capacity), the Draft PEIS must state this plainly as an unavoidable significant adverse impact under SEPA.

Conclusion
Because stand-alone BESS facilities "could be sited in a variety of locations" across Washington, proximity to residential communities and vulnerable environmental features must be treated as a core condition of your programmatic analysis.

Thank you for accepting and considering this scoping comment. Please keep me informed of all future notices, public hearings, and the release of the Draft PEIS for Publication No. 26-06-017.

Sincerely,

Vasileios Zois

6506 Douglas Avenue Southeast

Snoqualmie, WA 98065