Matthew Gray

To the Department of Ecology, Clean Energy Coordination:

My name is Matthew Gray and I live at 10826 428th Ave SE, North Bend, WA 98045. 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 just the remote ones it has studied before, since its not about size but the potential for harm from a number of different sources and failures. The study should include all container-style installations being proposed since Ecology has not yet fully understand the potential harm and be consistent across the state. The study should pictures of all potential situations including container-sized battery boxes beside homes and schools to support Ecologies descriptions of sites. The study should assume facilities would be built to the rules Washington has actually adopted similar to other development rules and regulations such as development in floodplains, stormwater, wetlands, and state that any updates will immediately be included similar to road and stormwater standards adopted by other state agencies. 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 the PEIS evaluate the full range of stand-alone facilities actually being proposed in Washington — including large container-based lithium-ion installations sited near homes, schools, and constrained road networks — and that it analyze those facilities as built to the code Washington has actually adopted, drawing on independent safety data rather than industry assurances, and identify the most recent safety standards as required mitigation.

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. 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 prior to application to fully understand possible impacts similar to how new technologies are evaluated prior to implementation. It's important that the study model

what a battery fire's smoke does to the people living nearby and downwind. The scoping document acknowledges toxic gas from damaged batteries can damage firefighters' skin and lungs. It does not mention neighbors, who have no protective gear and may not even be aware of the event. Evacuation, displacement, and offsite cleanup should be included in evaluating impacts. 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. The study should look at what a multi-day battery fire demands from local fire, hazmat, hospital, and evacuation capacity, since Ecology could not say whether the burden on small rural fire districts can be fixed. 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. Standards need to be quantified so that they can hold developers to standards and permit writers don't have to guess. The siting and design considerations Ecology plans to give developers from the study must include minimum distances from homes, schools, hospitals, streams, parks, and drinking-water wells that are proven to be safe for the surrounding community. 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 downwind of a proposed stand-alone BESS site, in the same air basin, fire district, and hospital service area.

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,

Matthew Gray
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