

Sean Smith

To the Department of Ecology, Clean Energy Coordination:

My name is Sean Smith and I live at 15825 SE 258th Street, Covington, WA. 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 in the Snoqualmie Valley, 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 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. Snoqualmie Valley's conditions 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.

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 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 am a Natural Resource Manager/Environmental Planner, 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,
Sean Smith
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