Carlo Spani

To the Department of Ecology, Clean Energy Coordination:

My name is Carlo Spani and I live at 35124 SE Kinsey St. 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. 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.
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.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed. 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,

Carlo Spani
35124 SE Kinsey St