Mann-Ling Thibert

To the Department of Ecology, Clean Energy Coordination:

My name is Mann-Ling Thibert and I live at 7726 Douglas Ave SE, Snoqualmie, WA 98065. I am writing to submit a scoping comment on the Programmatic Environmental Impact Statement (PEIS) for stand-alone, utility-scale, lithium-ion battery energy storage system facilities in Washington (Publication 26-06-017).

I am commenting because Washington is siting stand-alone battery facilities near communities, including one 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 latest code Washington actually adopted, drawing on independent safety data rather than industry assurances, and identify the most recent safety standards as required mitigation. PEIS should also evaluate the maximum limit allowed for economic losses in the community should the project fail during any phase of the project. PEIS should evaluate and determine the size allowed on the container-based lithium-ion installations to be sized appropriately with the certain size and complexity of the community.

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 just because it is close to a substation does not make it suitable.

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. Review traffic impact caused by any nearby congested freeway or three-way intersection which is the major supply line from west to east coast.

Q4 · Mitigation — The steps Ecology should require for reducing 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, supply budget for effective extinguishing equipment and training for utility-scale, lithium-ion battery

energy storage system facilities; containment and disposal plans for fire-suppression water; enforceable nighttime noise limits at the nearest residence; and decommissioning and financial-assurance requirements. Ensure project accidents do not cause any long term or permanent harm to the community.

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. All hazards and negative impacts by manmade projects rather than caused by mother nature should be prevented or minimized as much as possible prior to build. Therefore, I ask Ecology to thoroughly review the proposed BESS project and make sure the code is updated and relevant to the new BESS technology. 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,
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