Christina Stembler

Public Comment Regarding the Washington State Programmatic Environmental Impact Statement for Utility-Scale Battery Energy Storage Systems

To the Washington State Department of Ecology:

I am writing as a resident of the Snoqualmie Valley and as a mother who has called the City of Snoqualmie home for approximately 20 years. I am submitting this comment because I believe the proposed statewide evaluation of utility-scale battery energy storage systems must fully examine what happens when large-scale lithium-ion battery facilities are proposed directly adjacent to established communities, parks, forests, wildlife habitat, trails, homes, and the places where children live and play.

For me, this is not an abstract environmental issue. This is my home.

My family has lived in Snoqualmie for 20 years. My four children have had the opportunity to grow up here surrounded by an exceptional school district, history, forests, trails, parks, and the remarkable natural beauty of the Snoqualmie Valley. They have been able to experience the kind of childhood that is becoming increasingly difficult to find—a childhood where nature is not simply something viewed from a distance, but something that is part of everyday life.

I know this forest personally.

The forest behind my home has been a gift throughout the years. From my own backyard, I have witnessed wild turkey, quail, owls, a pileated woodpecker, bear, bobcat, and deer. I have watched wildlife move through a landscape that is also deeply intertwined with the human community.

I have even had a little girl emerge from the forest and sit on the swings in my backyard after becoming separated from her group. As it turned out, she was in my son's kindergarten class. I have had people traveling the trail make their way into my backyard to ask for directions. And I have been the person walking those same trails, becoming completely lost in the wonder of the trees.

That forest is not an empty piece of land. It provides joy. It provides education. It provides exploration. It provides peace. It provides connection. It provides habitat. And, for many people in this community, it provides something increasingly precious: hope.

Over the two decades I have lived here, I have also watched Snoqualmie change. I have watched construction and tree removal alter the landscape, and I have personally noticed that the wildlife visiting my backyard has become less frequent.

That experience has taught me something important: environmental impacts do not always arrive as one dramatic event. Sometimes they happen incrementally—one tree, one parcel, one construction project, one habitat disturbance at a time—until the community eventually realizes that something irreplaceable has been lost.

That is why I am deeply concerned about the continued movement toward large-scale industrial development in locations immediately adjacent to our established community.

The proposed Cascadia Ridge Resiliency Energy Storage project illustrates the importance of this statewide review. The proposal is for a 130-megawatt utility-scale battery energy storage facility on up to approximately 30 acres within roughly 45 acres of land just south of (touching the boundary) Fisher Creek Park, across Snoqualmie Parkway from Snoqualmie Ridge, in unincorporated King County.

Although the proposed project is outside Snoqualmie's municipal boundaries, its proximity means that the people, parks, trails, homes, wildlife, roads, emergency responders, and community spaces of Snoqualmie are directly relevant to the discussion.

This is precisely why I believe Ecology's statewide PEIS must examine not only whether BESS facilities can be engineered to operate safely under normal conditions, but also whether certain

locations create unacceptable or substantially different risks because of their surrounding environment and population.

Children and Community Safety

I am the mother of four children. My youngest two are now approaching the age when they will leave the nest, but that does not lessen my responsibility for the children who will grow up here after mine are gone. I believe we have a responsibility to protect the children of our entire community—not simply our own.

Fisher Creek Park is one of the places where Snoqualmie children gather to play, laugh, explore, and build memories. Our trails are used by families, walkers, runners, cyclists, and people simply looking for a moment of peace in nature.

When evaluating utility-scale lithium-ion battery facilities, I believe proximity to children, homes, parks, schools, trails, and other heavily used community spaces must be treated as a significant environmental and public-safety consideration.

The question should not simply be:

Can a battery facility be built here?

The question should also be:

Is this an appropriate place for a facility of this scale and technology, given everything that surrounds it?

Fire, Air Quality, Emergency Response, and Environmental Consequences

I am particularly concerned about the consequences of a serious battery failure, including thermal runaway and fire.

Ecology itself has identified potential concerns associated with battery storage, including hazardous air emissions risks for emergency responders if batteries are damaged or fail, increased wildfire danger, noise, and limitations related to fire response. Ecology has also stated that the purpose of this PEIS is to examine potential impacts, identify mitigation measures, and identify gaps in regulations, codes, and emergency response.

I strongly urge Ecology to examine these issues with the assumption that prevention and mitigation are not the same thing as elimination of risk.

A facility may have monitoring systems, alarms, fire suppression equipment, trained responders, and other safeguards. Those measures are important. But the existence of safeguards should not end the environmental analysis.

Ecology should also ask:

- What happens when those safeguards fail?
- What happens when multiple battery units are involved?
- What hazardous substances may be released during a catastrophic battery fire?
- What happens to surrounding air quality?
- What happens to soil, surface water, groundwater, wetlands, vegetation, and wildlife?
- What happens to people living, walking, working, or playing nearby?
- What is the evacuation plan?
- How quickly can emergency responders access the facility?
- What resources are required from local fire departments?
- Can local emergency-response agencies realistically sustain the demands of a large-scale BESS incident?
- What happens when smoke, fire, or hazardous conditions affect surrounding roads and neighborhoods?
- Who is responsible for long-term environmental monitoring and cleanup?
- Who pays when the consequences extend beyond the facility's fence line?
- What happens to the community if an incident makes nearby land unsafe or unusable for an

extended period?
These questions deserve rigorous scientific analysis before this technology becomes normalized in locations adjacent to communities.

Wildlife and Forest Habitat

My concern is not limited to the immediate footprint of a facility. The surrounding forest is an ecosystem. The wildlife I have personally observed—bear, bobcat, deer, turkey, quail, owls, and pileated woodpeckers—is evidence of the living community that exists here.
I ask Ecology to examine the cumulative effects of BESS development on habitat, wildlife movement, vegetation, forest fragmentation, water resources, noise, lighting, construction disturbance, and the potential consequences of a catastrophic fire or release.
We cannot evaluate the loss of habitat simply by calculating the number of acres cleared.
An acre of forest is not merely an acre. It is trees. It is soil. It is water. It is food. It is shelter. It is nesting habitat. It is wildlife movement. It is shade. It is carbon storage. It is part of an interconnected ecosystem. And it is also part of the identity of the community surrounding it.

Snoqualmie Is Different

Snoqualmie is not simply another location on a map where an industrial facility can be placed because electrical infrastructure happens to be nearby.
Snoqualmie has a history, a landscape, and a community identity that people have chosen to protect and preserve.
I have spent years walking our trails and hiking our mountains. I have walked past community gardens and parks filled with children laughing and playing. I have encountered deer and horses along the trails. I have experienced the quietness of the forest and the sense of connection that comes from living alongside it.
This is what makes Snoqualmie special. It is the history. It is the beauty. It is the forest. It is the wildlife. It is the trails. It is the children. It is the Valley of The People Of The Moon. It is the people who come together when something important is at stake. It is a community that understands that the natural environment is not separate from the community—it is part of it.

Economic Value Cannot Be the Only Measure

I understand that utility-scale battery storage can provide services to the electrical grid and that developers identify economic and energy benefits associated with these facilities.
Those benefits should be examined. But they should be examined alongside the full environmental and community costs.
When a project is described in terms of financial investment, tax revenue, jobs, or grid benefits, I believe we must also ask what value is being assigned to clean air, healthy forests, wildlife habitat, children's safety, emergency-response capacity, peace of mind, and the long-term character of a community.
If financial assurance is proposed as protection against potential losses, Ecology should examine whether that assurance is actually proportional to the potential consequences of a catastrophic event.
A dollar amount can compensate for certain documented losses. It cannot replace a human life.
It cannot restore a childhood memory. It cannot bring back a destroyed forest overnight. It cannot restore a wildlife habitat exactly as it was. It cannot erase exposure to hazardous smoke.
It cannot purchase back a community's sense of safety. Life is priceless and cannot be bought.

What I Am Asking Ecology to Consider

I respectfully ask the Department of Ecology to make the statewide BESS PEIS as comprehensive as possible and to give particular attention to facilities proposed near established communities and environmentally sensitive areas.
I ask that the study thoroughly evaluate:

1. Fire and thermal-runaway risks, including worst-case and cascading scenarios.
2. Air emissions and toxic substances associated with battery fires and emergency response.
3. Impacts to surface water, groundwater, soil, wetlands, and wildlife following fires or fire suppression.
4. Wildlife habitat and forest fragmentation, including cumulative impacts.
5. Proximity to homes, parks, schools, trails, and other populated areas.
6. Emergency-response capacity, including whether local agencies have sufficient equipment, staffing, training, and resources.
7. Evacuation requirements and realistic evacuation scenarios.
8. Long-term monitoring, decommissioning, and environmental cleanup.
9. Financial responsibility and liability, including whether proposed financial assurances could realistically address worst-case consequences.
10. Cumulative impacts when BESS facilities are developed in or near communities already experiencing substantial growth and habitat loss.
11. Alternative siting considerations, including whether utility-scale BESS facilities should be located farther from homes, children, parks, forests, and other sensitive uses when suitable alternatives exist.
12. Whether current regulations and safety standards are sufficient for the scale of BESS facilities now being proposed.

Most importantly, I ask Ecology to examine where these facilities should be located, not merely how they can be mitigated after a location has already been selected.

My Personal Position

I know that one person cannot stop every change that comes to a community.

But communities are built by people who are willing to speak when something matters.

I am one of those people.

I have lived in Snoqualmie for 20 years. I have raised my children here. I have walked these forests. I have watched wildlife from my backyard. I have watched my children experience the parks, trails, schools, and natural beauty of this Valley.

I have also watched pieces of that natural environment disappear as development has continued.

I do not want to look back years from now and wonder why we failed to speak when we still had the opportunity to protect what remained.

We have a choice about what kind of communities we build.

We can treat forests, wildlife, children, parks, and the natural landscape as obstacles to development.

Or we can recognize them as assets that have intrinsic value and that deserve to be protected.

I am asking the Washington State Department of Ecology to choose the latter in its evaluation of utility-scale battery energy storage systems.

I am asking you to look beyond the fence line of a proposed facility. Look at the homes. Look at the children. Look at Fisher Creek Park. Look at the trails. Look at the forest. Look at the wildlife. Look at the people who have built their lives here.

And please remember that environmental protection is not simply about protecting land.

It is about protecting the living community that depends upon that land.

I am unequivocally opposed to placing the proposed large-scale BESS facility adjacent to the Snoqualmie community, and I strongly urge the Department of Ecology to ensure that the statewide PEIS fully examines the environmental, health, safety, emergency-response, wildlife, and community consequences associated with utility-scale lithium-ion battery energy storage—particularly when these facilities are proposed immediately alongside established communities and sensitive natural areas.

Thank you for accepting and considering my comments.
Respectfully,
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