Melody Correia

To the Department of Ecology, Clean Energy Coordination:

My name is Melody Correia and I live at 6535 Fairway Ave, SE, Snoqualmie WA 98065. 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.
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.
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. 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." 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.
Evacuation, displacement, and offsite cleanup should count as impacts in their own right. Ecology's own example, the Moss Landing fire, forced 1,200 people from their homes. It's important that the study model what a battery fire's smoke does to the people living nearby. The scoping document acknowledges toxic gas from damaged batteries can hurt firefighters' skin and lungs. It does not mention neighbors, who have no protective gear and may not be able to leave. In the case of Cascadia Ridge, there are multiple facilities that serve thousands of children per week just a few hundred feet away, those include Sno-King, a skating facility that hosts over 500 children on a daily basis 7 days a week. As well as a church daycare and preschool at Church on the Ridge that has well over 100 babies, toddlers and pre school-aged children. Not to mention over 1,000 students being educated between the Timber Ridge and Cascade View Elementary schools who will need to be sheltered in place or evacuated and will have their education interrupted if there is an event at this facility. Being very familiar with both schools, the church and the skating rink, none of these facilities have the ability to filter out toxins from a fire nor would they have adequate emergency

planning to shelter these children in place nor means to quickly evacuate the children.

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.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed, the Cascadia Ridge project. My child attends a school near a proposed stand-alone BESS site, at Cascade View Elementary School, he skates at Sno-King, he went to Sunday school at Church on the Ridge. My household depends on Snoqualmie Parkway for evacuation, which is also an emergency route for everyone along it and many people in the valley.

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,
Melody Correia
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