Valerie Berglund

To the Department of Ecology, Clean Energy Coordination:

My name is Valerie Berglund and I live at 6717 Elderberry Ave SE, Snoqualmie WA 98065, United States. 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:

Q3 · Impacts to analyze — The harms the study has to look at.
It's crucial that responder training, hard-to-extinguish fires, toxic air, harm to water and fish, and cleanup each get a full analysis, not a mention, as the Ecology study scoping document states it "will evaluate" each of them. 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. 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. The study needs to measure nighttime noise at the nearest home, not at the fence line, since Ecology's earlier studies found that noise from these facilities reaches 1,000 feet in quiet rural areas. I ask that the impact analysis cover battery-fire smoke and hydrogen fluoride under valley inversion conditions, fire-suppression runoff reaching wells and salmon streams, the load a multi-day incident puts on rural fire, HazMat, hospital, and evacuation capacity, all-night mechanical noise well past 1,000 feet, and how container-based facilities perform in an earthquake.

Q4 · Mitigation — The steps Ecology should require to reduce the harm.
I would like the study to name specific, measurable protections a permit can require. Protections described "at a high level" give my county nothing to write into a permit. The study should be specific enough to give local reviewers something to hold a developer to, because my county will lean on it when it reviews a real project. I ask that Ecology name specific mitigation lead agencies can adopt as permit conditions: real setbacks from homes, schools, and wells; UL 9540A testing and the current NFPA 855 edition; funded training and equipment for local responders before a facility operates; capture and disposal of fire-suppression water; nighttime noise limits measured at the nearest home; and decommissioning bonds.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed, the Cascadia BESS in Snoqualmie project. My household drinking water comes from a private well. My household depends on The parkway , which is also an emergency route for everyone along it. I am a Im a small business owner that operates within the evacuation limits. My business is primarily outside. I am concerned, 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,
Valerie Berglund
6717 Elderberry Ave SE, Snoqualmie WA 98065, United States