Bryan Keller

To the Department of Ecology, Clean Energy Coordination:

My name is Bryan Keller and I live at 6511 W Crest View Loop 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:

Q2 · Geographic scope — Where the study assumes batteries will go.
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. I live in Snoqualmie, about 1 mile from the proposed site, and I oppose siting large lithium battery facilities in communities like ours. I ask that the programmatic EIS address the following. Do not treat valleys like ours as "suitable" by default. The study should weigh valley terrain that traps smoke, floodplains, wildfire-urban interface zones, limited evacuation routes, and distance from schools. Set minimum setbacks from schools and homes based on smoke modeling rather than noise alone. I ask that Ecology not define "suitable" areas by grid proximity alone, and that the geographic-scope assumptions screen for nearby homes and schools, wildfire exposure, mapped seismic and flood hazards, private-well dependence, and limited evacuation routes.

Q3 · Impacts to analyze — The harms the study has to look at.
Analyze worst-case thermal runaway events, not just typical failures. The Moss Landing fire in January 2025 burned for days and forced evacuations. Model how toxic smoke, including hydrogen fluoride, would travel and settle in a narrow valley prone to temperature inversions, and what that means for schools, homes, and outdoor activities within several miles. Study contamination of groundwater and the Snoqualmie River from firefighting runoff. Assess whether rural fire districts have the equipment, training, and water supply to respond, and how long mutual aid would take to arrive. Include a socioeconomic analysis of impacts on nearby property values. 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.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed, the BESS Snoqualmie Fischer Creek project. 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,
Bryan Keller
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