Hannah Prall

To the Department of Ecology, Clean Energy Coordination:

My name is Hannah Prall and I live in Snoqualmie, WA. 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 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:

It's important that the study models what a battery fire's smoke does to the people living nearby based on the regional conditions for that area. 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. It is also should be explicitly stated that environmental conditions should be factored into the safety studies. I live in an area with high winds so standard safety testing does not take into account the effects of 40mph winds on fires and smoke dispersion. Washington's unique terrain leads to environmental challenges and geographic constraints (mountains, wind, limited access to towns, etc.) that will impact first responder and citizens' safety in event of a runaway battery event. 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.

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,
Hannah Prall
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