Marla Person

To the Department of Ecology, Clean Energy Coordination:

My name is Marla Person and I live at 7828 Douglas Ave, SE. 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.
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." 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. 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. Conditions like those in the Snoqualmie Valley should be part of what the study considers, because this is the one chance to shape the study area before Ecology draws it. 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.
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. The study should look at what a multi-day battery fire demands from local fire, hazmat, hospital, and evacuation capacity, since Ecology could not say whether the burden on small rural fire districts can be fixed.

We have just begun to see the effects of lithium battery fire events, Warwick New York, Moss Landing California, 2021, 2022, 2025 and September 18, 2026. There was even a fire at a small accessory BESS In Laverne California September 22, 2026. A tiny, newer facility with the latest technology batteries exploded and caught fire. That facility was new, having just been commissioned early in summer 2026, was only 1 MW and evacuated over 500 residents. Here Jupiter/Black Rock and EFSEC are considering allowing a 130 megawatt facility, over 33 football fields of batteries where we have over 2000 children, babies and students using facilities within a few hundred feet to one half mile of the proposed Cascadia Site. You need to be absolutely sure that you are doing the right thing by placing this adjacent next to so many residential homes and

children. One in three residents in our neighborhood is a child..... Any event large even or small will incite a huge lawsuit after the fight the community presented. With well-documented issues brought up including: evacuation planning shortfalls, lack of egress, failing bridges and large amounts critical areas including our watershed that supplies drinking water for thousands of king county residents. Fallout or issues here will also taint and hinder any future infrastructure buildout as far as BESS facilities in our state, forever.

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 Cascades Ridge project. My children attend school near a proposed stand-alone BESS site, at Cascade. 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,
Marla Person
7828 Douglas Ave, SE