

Charles Vision

To the Department of Ecology, Clean Energy Coordination:

My name is Charles Vision and I live at 34602 Cottonwood Dr 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 have a master's degree in Mechanical engineer and have 30 years of experience specializing in failure analysis, and I offer this comment with that professional background.

I am commenting because a stand-alone BESS facility is 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:

Q1 · Facility types — Which kinds of battery facilities get studied.

The study should assume companies will build facilities to the exact rules Washington has actually adopted. So, the rules should be updated regularly to the latest standards as they are being modified as failures occur and the states learn more about the issues. This technology is quite young and changing regularly so the state should be ready to revise their rules to keep up with the technology. The study should also use independent safety data rather than just relying on a limited set of failure data being documented by EPRI. As EPRI has stated many times in their database, their failure data is inadequate since no laws on the state or federal level require companies to admit when failures occur that do not make the news. Unless we force the companies to document all failures, we will never know the full scale of what issues this technology poses.

This study also needs to look at the effect of evacuations and cleanup since the closer these sites are to homes, the more this will dramatically affect the neighborhoods. 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.

This is personal for my household. I live under 1 mile from the proposed site. In an emergency my household would evacuate via Snoqualmie Parkway, along with everyone else who depends on that road.

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,
Charles Vision
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