JUDY PANKRATZ-WHITE

To the Department of Ecology, Clean Energy Coordination:

My name is Judy PankratzWhite and I live at 4631 357th Ave SE, Fall City, WA 98024. 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 for Snoqualmie, 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. The study's geographic assumptions should screen out places with private wells, floodplains, earthquake faults, and neighborhoods with one road out, because site details will be left to later reviews. Wildfire exposure and fire-district capacity should be part of the map, since Ecology's own earlier studies flagged wildfire risk from "new ignition sources in remote locations with limited response capabilities." 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 important that the study model what a battery fire's smoke does to the people living nearby and the potential for long term damages. 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 should consider what equipment might be necessary for safe evacuation for residents and the availablilty of equipment, transportation and routes during all seasons and weather conditions. I suffer from asthma and congestive heart failure. I am extremely susceptible to polluted and contaminated air. 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. Noise travels well in rural areas, especially downhill and over water. I would like to see the study thoroughly examine the direct, indirect, and cumulative effects of how smoke settles into valleys, runoff reaches wells and streams, and what happens when there are several facilities on the same stretch of grid. Smoke, chemicals and contamination tend to flow down in elevation...My home is on the valley floor, about 1000 feet in elevation below a proposed site. It is in a restricted area because of water recharge to wells and the Snoqualmie River. It's crucial that responder availability, training, hard-to-extinguish fires, toxic air, harm to air, 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. Our first responders are volunteer firemen, and a single county sheriff

officer for an area that takes hours to cross. 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 downstream and downwind of a proposed stand-alone BESS site, in the same air basin, fire district, and hospital service area. My household drinking water comes from a private well. My household depends on SR 202, which is our only route to and from home, and is often closed during flood events. SR 202 is a limited, 2-lane 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.

I understand these batteries are needed for modern living, but the quality of living and the resources to deal with emergencies MUST be thoroughly investigated BEFORE siting and construction.

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,
JUDY C. PANKRATZ-WHITE
4631 357th Ave SE, Fall City, WA 98024