Tarra Dockter

Dear Washington State Department of Ecology,

I am a Snoqualmie-area resident writing to express my strong opposition to the siting of large-scale Battery Energy Storage System facilities near established residential communities, including Jupiter Power's proposed Cascadia Ridge Resiliency Energy Storage project near Snoqualmie Ridge.

I urge Ecology to use this PEIS process to establish strong statewide protections that put the safety of residents, emergency responders, drinking water, wildlife, and environmentally sensitive lands ahead of accelerated development of utility-scale BESS projects.

I am particularly concerned by Jupiter Power's comments asking Ecology to streamline BESS permitting while limiting the extent to which traditional environmental impacts are addressed at the programmatic level. Jupiter argues that many issues involving water quality, wetlands, wildlife habitat and mitigation are too site-specific to be particularly useful in the PEIS.

I strongly disagree with that approach.

The fact that risks vary depending on location is exactly why Ecology should study them comprehensively now. The PEIS should identify locations where large-scale BESS facilities may simply be inappropriate because of proximity to homes, parks, schools, environmentally sensitive areas, wetlands, waterways, steep slopes, flood-prone areas, limited evacuation routes, or communities that do not have the emergency-response resources necessary for a major battery incident.

For communities such as Snoqualmie, these are not abstract concerns.

Jupiter Power is proposing a large utility-scale battery storage facility south of Fisher Creek Park near Snoqualmie Ridge. This project would place major energy infrastructure close to an established community and recreational and environmentally sensitive areas. Jupiter has also chosen to pursue approval through the Washington State Energy Facility Site Evaluation Council rather than continue through the local King County permitting process.

That makes strong statewide standards even more important.

At minimum, I ask Ecology to fully examine:

• Fire and thermal-runaway risks, including cascading failures and reignition.

• Toxic gases, smoke and particulate emissions from battery fires and their potential effects on nearby residents and emergency responders.

• Contaminated firefighting water, runoff, soil contamination, groundwater impacts and impacts to nearby streams and wetlands.

• Minimum setbacks from homes, schools, parks, trails and environmentally sensitive areas.

• Emergency evacuation requirements, including whether surrounding road networks can safely accommodate an evacuation during a major incident.

• Local fire-department capability, specialized equipment requirements, water requirements, training and costs placed on local taxpayers.

• Flooding, seismic hazards, steep slopes, landslide risks and other site-specific geological conditions.

• Noise and lighting impacts during both normal operation and emergency conditions.

• Wildlife, habitat and wetland impacts.

• Cumulative impacts when energy infrastructure is concentrated near existing communities.

• Full end-of-life requirements, including battery replacement, decommissioning, disposal, recycling and financial responsibility if a developer or operator ceases operations.

• Independent monitoring and emergency-response requirements rather than relying primarily on information supplied by project developers.

I also ask Ecology not to assume that the economic or grid benefits claimed by BESS developers outweigh the environmental or public-safety risks of a particular site. Those questions should be evaluated independently and transparently.

Jupiter Power states that battery projects may continue to grow in capacity and duration and asks Ecology not to limit the PEIS analysis based on facility size or storage duration. If increasingly large projects are contemplated, then increasingly strong siting, setback, environmental and emergency-response protections should be examined as well.

Washington should not create a permitting framework that makes it easier to place increasingly large battery facilities near residential communities without first establishing clear safety standards and identifying locations where this type of development should not occur.

For Snoqualmie, I oppose the Cascadia Ridge project and do not believe a utility-scale BESS facility of this nature belongs next to our community.

I respectfully ask Ecology to ensure that this PEIS does not become a tool primarily for accelerating BESS permitting. It should instead provide state and local decision-makers with strong, independent standards for determining when a site presents unacceptable risks and when a project should not proceed.

Please fully consider the concerns of communities that will be asked to live next to these facilities.

Thank you for considering my comments.