Alona Petett

To the Department of Ecology, Clean Energy Coordination:

My name is Alona Petett and I live at 38002 SE Northern Street. 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.
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. 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 Ecology not define "suitable" areas by grid proximity alone, and that the geographic-scope assumptions screen for nearby homes and schools, wildfire exposure, mapped seismic and flood hazards, private-well dependence, and limited evacuation routes.

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.

We live in a beautiful area and plan to take care of the land and resources to the best of our ability. I know there are other ways being developed for energy so put the resources into those and not into a plan that is in the process of becoming outdated before it is installed. I ask that the impact analysis cover battery-fire smoke and hydrogen fluoride under valley inversion conditions, fire-suppression runoff reaching wells and salmon streams, the load a multi-day incident puts on rural fire, HazMat, hospital, and evacuation capacity, all-night mechanical noise well past 1,000 feet, and how container-based facilities perform in an earthquake.

Q4 · Mitigation — The steps Ecology should require to reduce the harm.
The study should recommend developer-funded monitoring, cleanup guarantees, and decommissioning bonds, as state rules already require these for other energy facilities. The siting and design considerations Ecology plans to give developers from the study must include minimum distances from homes, schools, hospitals, and drinking-water wells that are proven to be safe for the surrounding community, not just general guidelines. I ask that the PEIS identify concrete mitigation measures, including minimum setbacks from homes, schools, hospitals, and drinking-water wells; large-scale fire testing (UL 9540A) and compliance with the current edition of NFPA 855 regardless of state adoption status; funded emergency-response plans, training, and equipment for local fire districts before operation; containment and disposal plans for fire-suppression water; enforceable nighttime noise limits at the nearest residence; and decommissioning and financial-assurance requirements.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed.

My household depends on Railroad Ave / SR 202, 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,
Alona Petett
38002 SE Northern Street