Karen Rockow

To the Department of Ecology, Clean Energy Coordination:

My name is Karen Rockow and I currently reside at 36718 SE 86th St. 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 am moved to comment because Washington is siting stand-alone battery facilities near communities, including one 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:

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. 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. 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.

Q4 · Mitigation — The steps Ecology should require in order to reduce the harm.
I am requesting the study to identify specific, measurable protections a permit can require. Protections described "at a high level" are too vague and leave too much to interpretation and give my county nothing to write into a permit. 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.

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 your time and consideration regarding my concerns which are shared by many in Washington State. Please include it in the scoping record. Our community is following this PEIS

closely and intends to participate in the Draft PEIS comment period.

Respectfully,
Karen Rockow
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