Barbara Anderson

To the Department of Ecology, Clean Energy Coordination:

My name is Barbara Anderson and I live in Snohomish, Washington. 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 Washington is siting stand-alone battery facilities near communities, including one proposed in the Snoqualmie Valley where a lot of my family lives, 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:

Q4 · Mitigation — The steps Ecology should require to reduce the harm.

I would like the study to name specific, measurable protections a permit can require. Protections described "at a high level" give counties nothing to write into a permit and provide little protection for communities.

The siting and design considerations Ecology plans to give developers from the study must include minimum distances from homes, schools, hospitals, drinking-water wells, and rivers that are proven to be safe for the surrounding community, not just general guidelines.

The study should recommend large-scale fire testing be required for every facility, whether or not the state has adopted the newest code, since Ecology itself credits it with reducing risk.

The study should detail what it would take to reduce wildfire and fire-response harms, including funded training and equipment for local responders before a facility opens, since Ecology's earlier studies could not say whether they can be reduced enough.

If harm from a BESS facility cannot be fixed, such as a fire that a small rural district cannot contain, the study should say so plainly and label it unavoidable.

The study should recommend developer-funded monitoring, cleanup guarantees, and decommissioning bonds, as state rules already require these for other energy facilities.

The study should state that local governments may require stronger protections than the state minimum. State standards should be a floor, not a ceiling.

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 considering this comment. Please include it in the scoping record.

Sincerely,
Barbara Anderson
Snohomish, Washington