Jennifer Good

To the Department of Ecology, Clean Energy Coordination:

My name is Jennifer Good and I live at 39664 SE Spruce Street, Snoqualmie WA98065. 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, 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. Closeness to existing infrastructure should not be used as a stand-in for a safe site. Being near a substation should not make a place "suitable." Our parks and neighborhoods have substations nearby by; however the damage a battery fire could cause to those homes, parks and businesses is a reason why these areas should be protected. Battery sites should be located far away from those.
The study's map should clearly say where facilities should not go, not only where they could, since nearly every kind of land is in play. 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. Earthquakes and floods could impact the integrity of the batteries, making these locations unsafe. These locations should not even be a consideration for storage. Private wells could also be impacted if there were a leak or chemicals were used to put out a fire. Locations near private wells shouldn't be allowed 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.

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,
Jennifer Good
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