Cecilia Novak

To the Department of Ecology, Clean Energy Coordination:

My name is Cecilia Novak and I live at 8830 Satterlee Ave SE, 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 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. 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.

Snoqualmie Ridge has a population of over 13,500 residents. Locally, there are over 40 parks and more than 30 miles of trails. Near these parks and trails are critical wetlands, native plants, and protected animals.

Q3 · Impacts to analyze — The harms the study must consider.

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.

King County Fire Protection District 38 has formally sent a letter to the WUTC that they do not have the proper resources to handle a BESS emergency. The local, small hospital, Snoqualmie Valley Health, has a Level 5 Trauma designation. Handling only minor to moderate injuries mean that they do not have the capability to care for more serious injuries. The Snoqualmie Valley School district also requests an environmental review to mitigate impacts to its students and staff. This is important to note since those under 18 years of age make up more than 33% of the population.

This is personal for my household. I live near a site where a stand-alone BESS facility is proposed. My household depends on Snoqualmie Parkway, which is also an emergency route for Snoqualmie Ridge.

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,

Cecilia Novak

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