



IDAHO DEPARTMENT OF FISH AND GAME

PANHANDLE REGION
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Coeur d' Alene, Idaho 83815

C.L. "Butch" Otter/Governor
Virgil Moore/Director

October 25, 2018

Mr. Grant Pfeifer
Regional Director, Eastern Regional Office
Washington Department of Ecology
4601 N Monroe Street
Spokane, WA 99205
PacWestSiliconEIS@ecy.wa.gov

Dear Mr. Pfeifer:

REFERENCE: PacWest Silicon Smelter Scoping

We have reviewed the project information regarding the PacWest Silicon Smelter available on your department's website (ver. 9/18/2018), proposed in Newport, Washington. As the state agency charged with preserving, protecting, perpetuating, and managing Idaho's fish and wildlife resources, we are responding to your agency's scoping request to ensure Idaho's species and habitats are given due consideration in the review process for the proposed smelter. The purpose of these comments is to assist the decision-making authority by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated. It is not the purpose of Idaho Department of Fish and Game to support or oppose this proposal.

The PacWest silicon smelter is proposed on a 188 acre parcel bordering the state of Idaho. Given the proximity and activities proposed, there is the potential for impacts to Idaho's fish and wildlife resources that call for further analysis. The project proponents, PacWest Inc., and the Washington Department of Ecology (Ecology) have agreed to prepare an Environmental Impact Statement (EIS) under the State Environmental Policy Act. The public scoping for this process has been initiated prior to PacWest submitting an application for permit. Therefore, our comments are broad and pertain to components we would like to see included in the forthcoming EIS related to Idaho's fish, wildlife, and their habitats.

The proposed project will produce silicon metal by heating quartz, coal, charcoal, and wood in submerged-arc furnaces. The project description acknowledges that the facility will emit toxic and hazardous air pollutants and greenhouse gases, with at least one pollutant exceeding a major source threshold. The types of air pollutants were not disclosed. Given prevailing wind patterns and known emissions from coal combustion, we recommend analyzing the potential for atmospheric deposition of environmental contaminants and the associated risk to sensitive

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species and habitats. We are specifically interested in the magnitude and radius of air quality impacts (including atmospheric deposition) that could affect the ecological conditions which support Idaho's wildlife, and the hunting, fishing, trapping and other recreational opportunities Idaho's wildlife provide for the citizens of Idaho. Idaho's wildlife also provide significant social and economic benefits to the people of Idaho, with wildlife based recreation generating well over \$1 billion dollars of economic activity annually.

Nitrogen oxides, sulfur dioxide, and heavy metals are particular pollutants of concern because these compounds are byproducts of coal burning. Nitrogen oxides and sulfur dioxides have the potential to deposit acid on the landscape, of particular risk to aquatic environments if these systems cannot effectively buffer a decreasing pH. The headwaters of our streams and lakes originate in high mountain areas in the Selkirk, Cabinet, Purcell and Bitterroot mountains that could intercept wet and dry deposition. Many of these tributaries are federally designated critical habitat to bull trout, a salmonid species particularly sensitive to changes in water chemistry. These systems furthermore support culturally, ecologically, and economically important recreational fisheries.

Priest Lake, Lake Pend Oreille, and Coeur d'Alene Lake are all within 40 miles of the project site. Based on the 2011 Idaho Sportfishing Economic Survey, the recreational fisheries on these three lakes alone were estimated to generate over \$30 million per year in food, lodging, gear, fuel, guiding, and licenses. Lake Pend Oreille is designated mercury impaired by the Idaho Department of Environmental Quality, with fish consumption advisories for some species and user groups. If emissions will include mercury or other heavy metals, we recommend analysis include potential cumulative effects on fisheries, bioaccumulation in the food web, and consumptive anglers. The Clark Fork/Pend Oreille basin in Idaho and Montana supports one of the healthiest known populations of adfluvial bull trout, an ESA listed species, in the species range. Fish passage facilities are currently proposed at both Albeni Falls and Cabinet Gorge dams, both down wind of the proposed smelter, to further bolster bull trout in the basin. Given bull trout requirements for high water quality standards being met, it will be important that emissions from the proposed smelter do not negatively affect bull trout habitat.

In addition to aquatic ecosystems, several sensitive habitat types and Species of Greatest Conservation Need (SGCN) are identified in Idaho's State Wildlife Action Plan. Namely, alpine habitats and subalpine-high montane conifer forests in Idaho contain several Tier I and II SGCN including wolverine, grizzly bear, Clark's nutcracker, mountain goat, and hoary marmot. Alpine and subalpine habitats that support these species have a short growing season and take longer to recover from disturbances and therefore may be particularly sensitive to atmospheric deposition of pollutants.

The Department-led Multi-species Baseline Initiative (MBI) collected abundance and distribution data across a wide array of wildlife species and habitats in the Idaho Panhandle from 2010-2014. In this study effort, numerous ecological guilds were represented from forest carnivores to amphibians to ground-dwelling invertebrates and furthermore included paired

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microclimate information. This dataset could be a useful tool analyzing potential ecological impacts from the proposed project. Future monitoring efforts with methodology consistent with the MBI could set up a statistically sound examination of changes to baseline wildlife conditions.

We would expect localized changes to wildlife use of the area due to increased noise, light, traffic, and fencing. Most of the area on the Idaho side of the project site is previously disturbed and now managed for agriculture or timber production. The five mile section of Highway 2 between Priest River and Oldtown has a high number of wildlife-vehicle collisions, primarily from whitetail deer. The nearby Hoodoo Mountain area consists of mesic lower montane forest and is popular for hunting and other outdoor recreation. Best management practices in the design and operation of the facility may reduce some impacts to wildlife.

The Idaho Department of Environmental Quality (IDEQ) is the lead Idaho agency regarding this project. We will rely on IDEQ's expertise in the analysis and interpretation of the PacWest proposal and EIS, therefore recommend close coordination with our state and its lead agency. Additional information on expected emissions, water use, stormwater control, construction, and operations will help us refine our review of potential impacts to fish and wildlife resources in Idaho.

Thank you for the opportunity to comment.

Sincerely,



Charles E. "Chip" Corsi
Regional Supervisor

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