



October 26, 2018

Grant Pfeifer, Director
Eastern Regional Office
Washington State Department of Ecology
VIA email: <http://sepa.ecology.commentinput.com>

Dear Mr. Pfeifer:

Please accept the following scoping comments submitted on behalf of the City of Sandpoint regarding the proposed PacWest Silicon Smelter. We appreciate your careful consideration of these comments when developing the draft Environmental Impact Statement (EIS) for the project.

Given the scale and potential regional impacts of this project, it is appropriate that the Washington State Department of Ecology (DOE) adopt a broad scope that includes the City of Sandpoint and the surrounding region when preparing the draft EIS for the proposed project. DOE has already set this precedent when reviewing other projects¹ that had the potential to seriously impact the quality of life of residents that lived outside of the immediate project area. We respectfully request that DOE perform the same due diligence in this case and that future public hearings be held in the City of Sandpoint. We would also like to request that the EIS address the project at full build out rather than the proposed initial phase in order to capture the full scope of impacts to the region throughout the project duration.

The overall project description provided by the DOE² is too vague and lacks clarity. Please refer to the following areas of impact for a more detailed explanation of the components of the project description and study that are lacking.

Regional Economic Impact:

The City of Sandpoint, along with the wider region, is experiencing significant growth due in large part to the high quality of life attributes of the area. In fact, according to 2017 census data, the Sandpoint Micropolitan Statistical Area is the seventh fastest growing in the nation. In Bonner County, nearly 20% of jobs are directly related to the travel and tourism sector.

¹ <https://fortress.wa.gov/ecy/publications/documents/1706013.pdf>

² <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/PacWest-Silicon-project>

The competitive aspects of our region relative to the broader economy are dependent on the quality of our air, water and recreational amenities. These “quality of life” characteristics are essential to our identity, our branding and are responsible to a large degree for our economic growth as local employers have stated the importance of “quality of life” in their decision to locate in the greater Sandpoint region.

The City therefore requests the draft EIS report study the potential economic impacts the proposed project would have on greater Sandpoint’s ability to attract and retain employers who are drawn to our “quality of life” amenities, which include the perception of clean air and water?³

Our economic success is also dependent on sustainable transportation infrastructure that may be impeded by the proposed project. **What type and volume of traffic would be created by the proposed project? How specifically would the applicant mitigate these impacts?**

Air Quality:

In 1997, the City of Sandpoint was designated a moderate PM-10 nonattainment area by the U.S. Environmental Protection Agency for particulate matter pollution. Since 1997, significant improvements in air quality have been realized due to collaborative and proactive efforts of City leaders, staff and residents to reduce local sources of particulates. In April 2013, the EPA re-designated Sandpoint to attainment status.

The project description does not articulate the specific types of pollutants that will be released into the air as byproducts of the silicon smelting process. These primarily include carbon dioxide, sulfur dioxide, nitrogen oxides and particulate matter among others. The byproducts could put our attainment status at risk.

The PSD Modeling Protocol⁴ provided by PacWest in October 2017 (then called HiTest Sands), states that operation of the smelter will emit approximately 320,000 metric tons per year of carbon dioxide, 760 metric tons per year of sulfur dioxide and 700 metric tons per year of nitrogen oxides. These compounds are in addition to small (2.5) and large (10) sized

³ <https://headwaterseconomics.org/economic-development/local-studies/bonner-county-economic-diversification/>

⁴ https://9b37abdd1c3135d9659b-298f012ea728efea7c302ad9a6f7bba0.ssl.cf2.rackcdn.com/knrd/HiTest_Sand_Newport_PSD_Modeling_Protocol.pdf

particulate matter in amounts that are also expected to exceed the Prevention of Significant Deterioration (PSD) threshold. **A comprehensive and accurate accounting of byproduct concentrations must be included in the project description and any analyses/findings included in the draft EIS.**

Furthermore, the modeling methods proposed by PacWest to DOE to assess air quality impacts of the proposed smelter do not utilize site-specific meteorological monitoring data and are therefore inadequate. **We respectfully request that on-site meteorological data is collected for one year to most accurately model pollutant dispersal as these pollutants have the potential to significantly degrade Sandpoint's air quality.**

The draft EIS also needs to study and detail the following:

- **How airborne pollutants will impact the respiratory health of residents and visitors of Sandpoint, particularly more vulnerable populations like children and the elderly**
- **How airborne pollutants will impact visibility in Sandpoint over the course of the year in accordance with other factors such as wood burning stove and wildfire smoke**
- **How compromised air quality will impact the local economy**
- **How risks from compromised air quality will be mitigated for**
- **The effects of airborne pollutants on bird migratory patterns**
- **The effects of Silica dust from open rail cars traveling through Bonner County**

Water Quality:

Sulphur dioxide and nitrogen oxide airborne pollutants that will result from the operation of the proposed smelter can be transported long distances. These compounds react with water and oxygen in the air to form sulfuric and nitric acids that fall to the ground as "acid rain" in the form of rain or snow, and even fog and hail. These acidic particles and gases can also attach to surfaces in the absence of moisture via dry deposition.

Acid rain and the addition of acidic particles to Lake Pend Oreille and other water bodies in the greater Sandpoint area can have serious impact on ecosystem health. As pH decreases over time, aquatic plants and wildlife will have different abilities to cope, with some species exhibiting higher sensitivities than others. The draft EIS should include a detailed analysis and findings of the following:

- **How prolonged acid exposure resulting from the operation of the silicon smelter will impact the health of aquatic plants and wildlife in the greater Sandpoint area.**
- **How deterioration of Lake Pend Oreille, Little Sandcreek and other waterways within the greater Sandpoint area will impact the economy of Sandpoint.**
- **How risks to ecosystem health and the local economy will be mitigated for.**

Transportation:

The project description does not include information about the number of trucks and trains that will be necessary to transport 170,000 tons of quartz rock (by train), 150,000 tons of blue gem coal (by train), and 130,000 tons of wood chips (by truck) each year to the proposed project site in Newport, WA.

The routes that these trucks and trains will travel is also not articulated in the project description. The City of Sandpoint is currently investing approximately \$5.3 million in improving our downtown streets and invests approximately \$1.4 million annually on street maintenance throughout the city. Transportation routes and truck/train volumes through Sandpoint must be examined in detail in the draft EIS. Specific questions include:

- **What are the maintenance costs associated with increased truck traffic through Sandpoint related to silicon smelter operations?**
- **Will the anticipated increase in truck traffic necessitate intersection improvements within Sandpoint or other urban areas within Bonner County?**
- **Who is responsible for paying for road maintenance, repair or intersection improvements in Sandpoint associated with increased truck traffic related to silicon smelter operations?**
- **What kinds of traffic delays can be expected in Sandpoint because of increased truck and train traffic related to the operation of the silicon smelter? How will associated risks be mitigated?**
- **What are the impacts to emergency response (police, fire/EMS) from increased truck and train traffic related to the operation of the silicon smelter? How will associated risks be mitigated for?**

Noise:

Noise within the Sandpoint city limits will increase as a result of the number of trucks and trains required to transport raw materials to the proposed project site in Newport, Washington. Impacts on noise levels also necessitate a thorough analysis of truck/train numbers and routes through the City of Sandpoint. The following should be studied and results detailed as part of the preparation of a draft EIS:

- **How truck/train transport will increase ambient noise throughout the city.**
- **The impact of and risks (health and well-being) associated with increased noise from truck/train transport. How will associated risks be mitigated?**

Penalty Structure, Decommissioning, Cleanup & Alternate Locations:

The draft EIS should articulate how the existing penalty structure will be revised or additional requirements will be imposed above and beyond the typical “pay to pollute” practice so that when violations occur, there is relief and remedy for water and air resources.

- **The draft EIS should require a full decommissioning and cleanup plan.**
- **The draft EIS should require the applicant fully evaluate other sites that will not have impacts on the City of Sandpoint.**

Alternatives:

We respectfully request that DOE consider the “No Action” alternative for the proposed project. Under this scenario, DOE should compare the socioeconomic, health and environmental impacts (to Sandpoint) of the PacWest Silicon Smelter as currently proposed versus if the proposal were not to occur at all.

Thank you for your careful consideration of these scoping comments. For your reference, I have also attached Sandpoint City Council Resolution 18-50 and the public comments entered into the record at our October 17, 2018 City Council meeting.

We look forward to participating in and reviewing a draft EIS that addresses how the proposed PacWest Silicon Smelter at all phases, including full build out, would directly and indirectly affect the residents, businesses, and visitors of Sandpoint. Clean air, clean water, and good stewardship of taxpayer dollars has a significant impact on our current and future economic and social vitality as local jobs, tourism, and livability are all fueled by a healthy environment.

Sincerely,



Shelby Rognstad, Mayor

Attachments: Resolution 18-50
Public Comments – 10/17/18 Council Meeting

Grant Pfeifer, Director
Eastern Regional Office
Washington State Department of Ecology
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Cc: Bonner County Board of County Commissioners
Governor Butch Otter
Idaho State Senator Shawn Keough
Idaho State Representatives Heather Scott, Sage Dickson
Senators Mike Crapo, James Risch
Representatives Raul Labrador