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Dear Grant,

Thank you for the opportunity to comment on the proposed PacWest smelter as part of the SEPA scoping process. My family has lived in the Newport area for 35 years, during which time we have witnessed many changes in our area. We are not opposed to sustainable rural economic development or job creation, one example of which is the Kalispel Tribe's recently opened retail market. The second phase which includes a recreation complex, restaurant, and lodging facilities are due to open in early 2019. However, we are opposed to the HiTest Sands/PacWest proposal for a coal and charcoal burning smelter to be constructed approximately one mile south of the town of Newport.

Following is a list of issues to be analyzed for the SEPA generated EIS.

1. Economic Impacts Resulting from Smelter Greenhouse Gas Emissions

- The economic environment must be part of this assessment, conducted by an independent entity and not by agencies or parties whose stated goal is to approve the smelter. Major economic timber, recreation, and agricultural resources could all decline if this smelter is permitted to go forward. They cannot be separated from environmental factors such as air and water quality due to the impacts that toxic greenhouse gas emissions have on these resources. Emissions contributing to acid rain could harm our valuable timber resources which are renewable assets of local landowners as well as county, state, and federal governments. Local farmers produce Timothy hay, blueberries, hops, nursery stock, and market produce. The Anheuser Busch Elk Mountain Hop Farm is the largest hop farm in the world (Brew Public 2016). The prime terroir superior for growing European hop varieties, located near Bonners Ferry, is downwind of smelter emissions. Newport's own Top Frog brewery located approximately five miles from the proposed smelter site could also be negatively impacted by smelter emissions. Also included in the greenhouse gas emissions area is the Green Bluff region. Dating to 1902, the Green Bluff Growers aids local farmers with agricultural tourism and is a major economic asset to the region (Green Bluff Growers Association 2018).
- Recreation is a large economic part of the local economy. People flock to the rivers and lakes year-round, to camp, hunt, fish, hike, bike, birdwatch, snowshoe, and ski. Schweitzer Mountain Resort is the largest ski resort in Idaho (Schweitzer Mountain Resort 2018) and is a major contributor to the Sandpoint area economy. Other resorts such as Mount Spokane Ski and Snowboard Resort and 49 Degrees North Resort are used year-round for winter sports, have hiking trails, an environmental center, and facilities where weddings and reunions are held. These recreation areas are all susceptible to smelter greenhouse gas emissions.

2. Impacts of Greenhouse Gas Emissions on Climate and Air Quality

- The United Nations recently published scientific panel report provides the sobering conclusion that in a mere twenty-two years, the current pace of climate change will cause irreversible environmental destruction and the food, water and breathable air, necessary for life on this planet (Intergovernmental Panel on Climate Change 2019).

- The United Nation study needs to be used as a tool for policy makers to increase greenhouse gas emissions, not reduce them. HiTest Sands/PacWest Silicon has stated that it will exceed greenhouse gas emission standards, modeling a 350-mile radius from the proposed smelter. However, as we know, ash from the Mt. St. Helens eruptions traveled around the world and our air quality is frequently impacted by air polluted in China which is blown across the Pacific Ocean. The proposed greenhouse gas emissions need to be analyzed considering the recently issued United Nations study.
- Greenhouse gas emissions must be analyzed for the impacts to human health, and the effects on wildlife, birds, fish, and plants. Our region is prone to periodic air inversions. We have just emerged from one such week-long episode (the week of October 15th). What impacts will smelter greenhouse gas emissions which exceed standards have during such episodes? How will the 24/7 operating schedule be adjusted during inversions to protect air quality or will it?
- The project description notes that ingots produced as a result of the smelting process can be crushed to dust depending on client needs. This entire process is hazy and ill-defined. What safeguards will be in place to ensure that this dust does not escape the filters? The smelting process schematic shows dust transported in bags, sacks, and bulk transport via truckload. How will this dust be handled, loaded, and transported? This part of the process needs to be critically examined in the EIS in relation to air and water quality.
- Once the smelter is in operation, is there a regulatory process in place if or when the smelter exceeds the stated emissions which are already above established standards? Does DOE intend to install a permanent air monitoring station at Newport and if so what steps would be taken to protect the air quality of our region? What is the regulatory process, and will it be sufficient to prohibit the smelter from further degrading air quality during inversions.

3. Impacts of the Proposed Smelter on Water Supply and Quality

- Exactly how much water will be used in smelter operations? HiTest Sands/PacWest has published varying water needs ranging from 800 to 5,000 or 6,000 or more than 200,000 gallons plus per day. The EIS needs to identify the source, amount, and withdrawal impacts on Newport residents, the Little Spokane River Watershed, and water users downstream of the proposed smelter.
- HiTest Sands/PacWest stated that there will be no holding ponds or other discharge areas for used water and that it will all be used in the smelting process. The site plans note that various structures and their locations are ON HOLD including a cooling water plant, fire water location, and potable water location. If all the water is vented as steam, how does the cooling water plant function and where will the water go once it is cooled?
- The project description notes that stormwater will be collected to be used as dust abatement. Our area is a Mediterranean climate regime and as such can go months without experiencing rain. Our appreciable moisture arrives as snow during the winter season. How much additional water will be needed for dust abatement when stormwater collection ponds are dry and where will the water used in sorting and crushing operations be discharged? The ON HOLD portion of the blueprint does not provide a location for the sewage disposal area. Is this where the used water will be discharged into? Clarification is needed in the EIS to define this method of water collection and disposal of used water.

4. Waste Disposal Impacts of the Proposed Smelter

- HiTest Sands/PacWest has repeatedly stated that no waste will be generated, that all waste will be burned in smelter operations which defies the laws of physics. Why is there no description of waste disposal such as slag produced in any furnace, in the project description posted on the DOE website? The EIS needs to define waste disposal, for example, what is in the waste, what is the level of toxicity, where will the waste be stored, where is the final waste depository, and how will it be transported? Mine tailings piles are ubiquitous across our region, many of which are simply too large and toxic to be disposed of and are simply capped in place (eg. Metaline Falls, the Alladin area in Stevens County, Smelerville). Will this be the preferred method of waste disposal at the proposed smelter and if so who will this impact the environment?

5. Noise and Light Impacts of the Proposed Smelter

- The project notes that new noise will be generated by the proposed smelter, but that it will always be operated in compliance with noise levels. The introduction of noise and light into a previously quiet, dark rural environment must be evaluated for the impact on human health and effects to migrating wildlife and waterfowl. Additionally, analyses must be conducted as to the long-term impacts to the existing rural environment and lifestyle.

6. Transportation Impacts from the Proposed Smelter

- According to the project description, raw materials would be delivered by rail and truck once the smelter is operational. The description fails however, to include information on additional vehicle traffic for materials and workers during construction. Impacts to be analyzed include the effects of additional greenhouse gas emissions due to increased rail and vehicle traffic during smelter construction as well as operation, the impacts to roads which are not constructed to all season standards, and what procedures to protect existing roads will be in effect during the spring breakup. If the smelter is a 24/7 operation, will chip trucks and other heavy vehicles be allowed to bypass the breakup limits, causing further road damage?
- Who will be responsible for the cost of constructing and maintaining roads for the profit of a private entity? HiTest Sands/PacWest has stated that the access road improvements costs will be shared with local landowners because it is an improvement to their property and they will benefit financially. By this logic, will all the local taxpayers see a tax increase destined for roads because the smelter benefits us all financially? This is another reason that an independent cost/benefit analysis must be a part of the EIS process.

7. Impacts from the Proposed Smelter on Public Health and Safety

- Dust created from cutting, grinding, drilling or disturbing quartz can contain crystalline silica particles, known as respirable silica dust. Respirable silica dust causes lung disease and lung cancer, and only a small amount of airborne silica dust can create a health hazard. This is another impact of the smelting process, also covered under air quality, which needs to be addressed in the EIS for the effects of escaped dust on workers as well as the public.
- Evidence that tiny carbon particles have been found in human placentas has recently been published by researchers at Queen Mary University in London (Liu et al. 2018). The research noted that air pollution is associated with reduced life quality, and pollutant particles inhaled by

pregnant women can affect fetal development (Evolving Science 2018). Health effects of greenhouse gases on humans with an emphasis on those most vulnerable such as pregnant women, children, seniors, and those with respiratory illness must be addressed by the EIS. HiTest Sands/PacWest has stated that they will exceed emission standards so what possible mitigation measures could be put in place to protect our most vulnerable citizens?

- Under the Trump administration, new replacement EPA regulations will allow for increased fine particulate matter, linked to heart and lung disease. Within a mere 12 years the result could be as many as 1,400 premature deaths and 15,000 new cases of upper respiratory disease annually as well as new health care costs in the billions (Freidman 2018). How will this health crisis be mitigated in terms of the proposed smelter's greenhouse gas emissions? How will this health problem be addressed in the EIS?
- Newport is a Public Hospital District, funded by county taxpayers. While residents have wonderful medical care, the hospital district is not equipped to deal with large scale industrial accidents or multiple victims of accidental gas releases. Our first responders would be overwhelmed. The project description notes that an on-site fire suppression system and risk management plans will be in place. The city of Newport has already seen the results of an industrial accident when the Zodiac Aerospace plant exploded (Culver 2016) and what guarantees can HiTest Sands/Pac West provide to prevent possible industrial accidents or unplanned toxic releases?

8. Cultural Resource Impacts from the Proposed Smelter

- While the project description notes that an archaeological survey was conducted in 2017, project plans have not been finalized. Additional cultural resource surveys must be considered in future revisions or additions to the project, particularly where ground disturbing activities will take place and in areas of limited ground visibility.

9. Non-Quantifiable Proposed Smelter Impacts

- Population in our area is growing due to our clean air and water, rural lifestyle, an environment geared to recreation and sustainable economic development, and affordable land prices. The recent installation of a fiber network, made possible by a grant from the Obama administration to our PUD, has made our area even more attractive. We are seeing an increase in new people from out of state relocate to our area for these reasons as more people realize the benefits of a small town, rural lifestyle.
- While not quantifiable, personal experiences should be taken into consideration during this process. I can share a few of my conversations. I met recent retirees from Edmunds, forced out of the Seattle area due to the high cost of living. This couple now regrets their choice of Pend Oreille County due to the proposed smelter and wondering where to go. Personal friends and family from western Washington are expressing their dismay and concerns about possibly relocating to our area or even visiting due to the proposed smelter. Colleagues and friends with small children have expressed their concerns about recreating using the rivers, lakes, trails, resorts or even visiting backyards of the area impacted by the smelter. I do not believe the best PR campaign in the world will convince most residents that the proposed smelter is safe or allay their fears that our area will not be the next Superfund Cleanup site or convince visitors to recreate in contaminated air. The harm has already been done. The proposed smelter sacrifices an entire

region’s health, air and water quality, rural environment and lifestyle for some future down the road gain. The following table (Marlon et al. 2018) from Yale University researchers provides the most recent data for public opinions on climate change. How does a greenhouse gas emitting smelter merge with Governor Inslee’s vision of a green Washington? It does not. The smelter is simply not a good fit based on the opinion of most northeast Washington/north Idaho residents.

Percentage of Adults who Agree with Climate Change Questions by County

Question	Pend Oreille County	Bonner County
Global warming is happening	67%	66%
Worried about global warming	57%	54%
Global warming will harm plants and animals	70%	67%
Global warming will harm future generations	70%	64%
Regulate CO2 as a pollutant	75%	73%
Corporations should do more to address global warming	67%	66%
Congress should do more to address global warming	60%	56%
Environmental protection is more important than economic growth	68%	64%

Data from Marlon et al. 2018

Thank you for the opportunity to comment on this proposed project.

Dana and Don Komen,
Newport, Washington

Sources Cited

BrewPublic

2016 A Visit to Elk Mountain Farms, the World’s Largest Hop Farm. Electronic document, <https://brewpublic.com/beer-education/a-visit-to-elk-mountain-farms-the-worlds-largest-hop-farm>, accessed October 15, 2018.

Culver, Nina

2016 Zodiac Aerospace's Newport Plant Fined 1.3 Million for Safety Violations related to Explosion. *The Spokesman Review*, 12 January. Spokane, Washington. Electronic document, <http://www.spokesman.com/stories/2016/jan/12/zodiac-aerospaces-newport-plant-fined-13-million>, accessed October 15, 2018.

Evolving Science

2018 Evidence of Air Pollutants in Placenta. Electronic document, www.evolving-science.com/environment/air-pollutant-particles-00789, accessed October 15, 2018.

Green Bluff Growers Association

2018 Visitor Information. Electronic document, <http://greenbluffgrowers.com>, accessed October 15, 2018.

Liu, Norrice

2018 Late Breaking Abstract-Do Inhaled Carbonaceous Particles Translocate from the Lung to the Placenta? Electronic document, <https://erscongress.org/about-ers-2018/media-centre/press-releases/143-press-releases/612-soot-pollution-placenta.html>, accessed October 15, 2018.

Marlon, Jennifer, Peter Howe, Matto Mildenerger, Anthony Leiserowitz, and Xinran Wang.

2018 Yale Climate Opinion Maps, 2018. Yale Program on Climate Change Communication, Visualizations and Data. Electronic document, <http://climatecommunication.yale.edu/visualizations-data/ycom-us-2018>, accessed October 20, 2018.

Schweitzer Mountain Resort

2018 Electronic document, <https://www.schweitzer.comMountain>, accessed October 15, 2018.

United Nations Intergovernmental Panel on Climate Change

2018 An IPCC Special Report on the Impacts of Global Warming of 1.5° Above Pre-Industrial Levels and Related Greenhouse Gas Emission Pathways, in the Context of Strengthening the Global Response to the Threat of Climate Change, Sustainable Developments, and the Efforts to Eradicate Poverty. Electronic Document, <http://www.ipcc.ch/report/sr15>, accessed October 22, 2018.