

Timothy Anderson

To Whom It May Concern:

I have grave concerns regarding the proposed PacWest/ Hi Test Sands Smelter Project. I would like to see the following questions addressed:

Transportation:

Truck:

Currently the new North Spokane Corridor Project is under construction. This project is nearly half completed and already we are seeing an increase in Interstate/International North American Corridor cross border, pass-thru truck and commercial traffic utilizing the Designated US 2/395/95 corridor. Commercial Traffic that once accessed US 95/ID-MT 200 via Coeur d Alene and Interstate 90, traveling between PNW/CA/AZ and points in Western Canada (as well as Alaska) are already transitioning to utilize the new freeway that will, when completed, represent shortest miles between Sandpoint Idaho and Spokane, and will eliminate outdated mileage guides that traditionally steered such traffic further east to Coeur d Alene, Idaho and up US 95. These guides are also being update in non commercial utilizations such as GPS shortest miles, Navigational Systems, Routing programs and published interstate atlas routes. Prior to the smelter proposal the impact was considered so great to the communities along US 2 that Idaho Department of Transportation and the Washington State Department of Transportation had already launched a study to determine future traffic impacts along this corridor. At the present time, US 2 between Spokane does not have the infrastructure to accommodate this increased traffic. Current traffic counts under represent the impact of the completion of multiple funded projects and some estimates advise that traffic counts will surpass the current traffic counts on the four lane sections of US 95 north of Coeur d' Alene and traffic counts on US 2 in Mead, WA.

The Idaho section of US 2, representative of a thirty two mile length and the Washington Section, representative of a near 60 mile length, does not have a single rest area. This represents an 80 mile stretch where longer vehicle operators cannot get off the road to use the restroom, take a rest break, or to exercise pets.

On the Idaho Section, there is only one west bound passing lane, and a short one and one- half mile long four lane section through Dover Bay. Only one stop light, at Idaho highway 57 in Priest River, Idaho accommodates ease of intersecting with US 2, and a shared light at US 2 and Idaho Highway 41 represents the only traffic control device found in Oldtown, Idaho and Newport, WA. Idaho 41 is already over capacity between Interstate 90 and Rathdrum, Idaho. Both ID 41 and US 95 are already under funded construction projects to complete additional four lane/divided highway improvements near Granite Hill and between Rathdrum and Post Falls Idaho, which will only increase traffic volumes utilizing US 2 to access Priest Lake, the Selkirk Loop, Nelson BC, local ski resorts, the Kalispel Tribe of Indians economic revitalization projects in Usk, WA. Furthermore, ID 41 is already near capacity between Rathdrum and Spirit Lake, Idaho and not one passing lane or truck climbing lane currently exists on this route, which features an exceptionally dangerous set of corners on a steep grade north of Spirit Lake, Idaho that has resulted in numerous roll over, large truck accidents at the bottom of the hill. During spring break-up load limitations, truck traffic crawls along this corridor. During summer recreational periods, this is compounded by recreational vehicle traffic and long lines of delayed travelers unable to pass these vehicles and motorist engage

in increasingly risky passing attempts to get around these delays.

Should a catastrophic wildfire occur, these corridors represent the only evacuation routes in North Idaho, and as local first responders discovered during the wildfire firestorms driven by 50 mph winds that broke out during the 2014/2015 wildfire seasons, the US 395 corridor became impassable with clogged traffic trying to outrace a fire storm and first responders attempting to deploy to mitigate the situation.

A similar event happened during the summer of 2018 on Interstate 5 in Northern California when motorists were trapped by wildfire and multiple vehicles went up in flames. The highway was shut down for nearly a week as officials attempted to clear the wreckage.

On the Washington Section of US 2, there are two divided highway sections representative of approximately ten miles of the highway and one short passing lane in both directions near the Little Spokane River Crossing. There are no passing lanes or four lane highway sections northeast of the highway 211 junction to the Idaho State Line. Only one traffic control device exists beyond Mead, WA.

My Questions are as follows:

- 1.) Will traffic studies reflect projected growth once the I-95 corridor, ID 41 and North Spokane Corridor are fully improved? Will these studies address commercial traffic deficiencies, lack of parking, lack of space for required off duty/sleep breaks, lack of rest areas, lack of evacuation capacity during fire storms, and lack of alternative routes during incidents?
- 2.) Will these studies address realistic additional impacts commercial smelter traffic will generate on these corridors--many of which are already at or near capacity?
- 3.) What traffic infrastructure improvements will Pac West fund and will these projects be completed prior to their operation?
- 4.) What percent of Pac West transportation needs will be met by truck and by rail? If these percentages change due to capacity issues or service failures or new raw materials locations not serviced by rail and/or truck, will additional studies and permitting be sought?
- 5.) There is not a single truck stop along the entire 80 mile length that represent both states. Already, on many occasions the Oldtown Rotary Park is filled to capacity with truckers. There is no place for commercial drivers to pull off the highway to take their mandated US DOT required rest breaks. There are only two fuel stops, one located in Oldtown Idaho, the other in Laclede Idaho, neither allow overnight truck parking nor do they provide services long haul interstate truckers require such as showers, restaurants, or overnight or DOT required rest break parking. How does PacWest propose to address this so that long haul truckers are not put in violation of federal law?

Rail:

The primary rail access point to Newport, WA is along the rail corridor intersections found in Dover Bay and Sandpoint Idaho. Here the trackage utilized by POVA intersects Union Pacific/Canadian Pacific tracks and Burlington Northern Santa Fe tracks. The POVA corridor lies exclusively along the Pend Oreille River, while the UP/CP and BNSF utilize corridors that parallel the Columbia, Pend Oreille, Frasier, Moyie, Kootenai, Clark Fork, Flathead, and Snake River fragile eco systems. All of these corridors are currently at capacity and at the present time, UP/CP corridors are not under electronic signal monitoring beyond Athol. Haz Mat spill clean up,

mitigation, and restoration teams are hours away and both railroads have checkered environmental records, with multiple derailments, watershed contamination incidents, and Haz Mat spills--some of which have shut down alternate surface transportation routes for weeks at a time. Rail reliability is hit and miss, and congestion results in spoilage, shut downs, and shortages.

My questions are as follows:

- 1.) If rail capacity continues to be an issue, which is already well documented and has necessitated a second rail bridge proposal over Lake Pend Oreille, what alternatives will PacWest deploy to ensure continued, reliable access to raw materials, fuels, and their need to transport finished product shipments? Will any shift from rail to trucking trigger a new EIS?
- 2.) What contingency plans will PacWest deploy should derailments/environmental contamination shut down rail access?
- 3.) What detailed plans will PacWest submit as to how they intend to construct access to utilize rail (and truck) supply chain needs? Will these projects require a separate EIS?
- 4.) Where will this infrastructure be located? Will local residents be subject to eminent domain? Are such rail access plans technically feasible? If they are not, will this also trigger a new EIS?
- 5) What Haz Mat preparations is/are the company deploying to address both on site and off site contamination /spill issues? Will a significant bond be posted to ensure taxpayers are not forced to subsidize PacWest contamination clean up issues?

Insurance:

- 1.) Will a bond be required to fund residents medical costs should future smelter related health disparities present?
- 2.) Will relocation, property value degradation and a levee canal type event be born by the tax payers or funded by bonds that PacWest is required to fund?
- 3.) Will PacWest contribute to offset increased risk ratings utilized by home insurance providers, and if a property is now deemed uninsurable by underwriters, will PacWest be required to pay off the mortgage and/or provide insurance to satisfy lending requirements?
- 4.) Wildfire risk has already resulted in cancellation of multiple homeowner policies in Pend Oreille County as wildfire scores exceeded underwriters expectation of total loss and substantial claims. Is PacWest prepared to compensate local residents who suddenly find themselves uninsurable due to the presence of a 24/7 3000°F industrial use underwriters determine has maxed out local first responder capacity, response times, or ability to mitigate?

Access:

- 1.) Will rail traffic/rail switching impede travel between Newport neighborhoods, cutting off access to schools, hospitals and first responders? How long will trains be permitted to block grade

crossings?

2.)What about Oldtown Idaho access to these vital services?

3.)Who is responsible for funding upgraded crossings to include flashing signals, crossing gates and limited access? Who will respond in a timely manner should these safety devices malfunction?

First responders:

Currently Newport/Oldtown are entirely reliant upon first responder networks involving rural districts, tribal assets, Department of Natural Resources and United States Forest Service resources. We do not have paid first responders and their response is based on volunteer force expectations. We do not have local major event or surge capacity first response. We do not have haz mat expertise. Our local hospital is ill equipped to handle a major triage event, and is understaffed. We rely on air response to transport patients to regional trauma centers. The smelter industry is well documented to experience explosions, fires, safety equipment failures, and unintended toxic gas, emissions, and environmental contamination. My questions are as follows:

1.) What funding expectations will PacWest contribute to train, equip, staff and mitigate smelter impacts on local community first responder expectations, infrastructure, and response times.

2.) Will such infrastructure expectations also consider multiple simultaneous event situations such as a major wildfire or ice storm occurring at the same time as a plant emergency, explosion, or fire?

3.) Will the plant be required to shut down during times of critical fire danger or when first responders are already committed to ongoing emergencies to ensure local first responder expectations are not jeopardized.

4.)During evacuations, will PacWest close to ensure local first responders and evacuees are able to seek shelter or get out of harm's way.

5.)Will PacWest subsidize or cover any life flight occurrence resulting from their operations or a disaster that impacts local residents.

6.)Should PacWest be found to have contributed to a decline in local resident health, will PacWest fund the cost of transportation to Spokane specialists, fund their co pays, prescription medications cost, lost wages, property damage, and mileage reimbursements?

7.)What steps will PacWest take to ensure they are not contributing to visibility issues that would prohibit life flight from accessing extractions points?

8.)What expectations will be enforced regarding PacWest communication between Pend Oreille and Bonner County emergency management agencies, first responders and local media? Will sirens be

deployed to warn local residents of an emergency?

9.) Who will fund training, certification, and first responder costs during plant construction?

10.) Will the plant be forced to shut down during extreme fire danger periods or when local power infrastructure is taxed due to ice storm or weather outages?