

October 24, 2018

Mr. Grant Pfeifer
Regional Director Eastern Washington Office
Washington State Department of Ecology
4601 N. Monroe Street
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We are accepting the opportunity for community input for scoping questions.

However we would like to put forth to you that the order of this process seems to be pre-mature at best. We say premature in that we are being asked to spend our time, energy and public resources to participate in the development of scoping questions for an environmental impact statement, when # 1) there is a lawsuit in the works to determine if the PacWest/PUD sale was legal or not and # 2) the land in question is not even zoned for industrial use and does not fit in with current comprehensive plan/ nor has a conditional use permit been applied for much less granted for such heavy industrial use and #3) The PacWest Narrative submitted to DOE of their plans is sketchy and previous public meetings, media submissions and online information all by PacWest themselves appear ever changing at best, making it difficult for concerned members of the public to develop scoping questions.

It seems that these issues should be addressed first before going forward with the EIS process. To go forward with the EIS at this point in time can certainly give a concerned community the impression that perhaps the stage is being pre-set for a pre-determined outcome, and as such, does not help to instill confidence in the "process" and could be viewed as disrespectful to the people and environment that will be directly affected.

That being said we have prepared a few preliminary scoping questions:

Ecology, please ensure that PacWest prior to any EIS determination:

- 1) At their cost, provide an onsite baseline air quality data collection for a minimum of one year prior to any construction start up not only at the facility site but also in addition, establish at their cost a baseline air quality data collection station set up somewhere on the Newport School Districts grounds or nearby property owned by the City of Newport or County owned property. The town of Newport & surrounding area experiences inversion patterns that Pac West would certainly contribute pollutants to. This data must be made easily available to the public. Without this baseline data, what type of air quality assurances can PacWest give us regarding the safety and quality of the air we are subject to if and when they are permitted to go forward? Should Pac West be able to proceed, both data collection sites should be ongoing for the duration of their potential existence and operation as a smelter.

- 2) If Pac West were to become a reality and if the presence of Pac West shows to be detrimental to our air quality what recourse will we have for correction?
A fine is not enough to restore someone's compromised health, or amend environmental damage to our wildlife, air, water and soils. Will gardeners downwind of PacWest who choose to grow organically be affected? If so, what recourse will they have?
- 3) How can Ecology require of PacWest the need to show how their water use and waste processing will not adversely impact the Little Spokane and Pend Oreille Watersheds, including other neighboring households need for water, plus the needs of animals, birds, soils and plant life? What will Ecology do if their impact turns out to be detrimental?
- 4) What assurances or independent monitoring can be provided to prove that Pac West will always use the high quality materials they claim will be used for their finished product?
- 5) The green case for the carbon offset gain is not solid. With the promise of jobs but at the cost of local citizenry and surrounding environment we are being persuaded to become one of the top major emissions polluters in WA State, and to share our pollution with our Idaho neighbors, but yet, somehow we are to take comfort in the fact that the hit we take will be helpful in the long run because some but not all of Pac West product will be used for Solar Panels. Their own preliminary projected modeling protocols indicate very troubling numbers. Are there more effective ways/available technology they could utilize to reduce these projected emissions even though it may be more expensive?
- 6) Pac West will financially benefit from a variety of tax credits, not we the people who have to live with decreased air quality from the increased air emissions to our community. What type of benefit or credit will we receive for reduced air quality, decreased property values and increased need for ancillary services to benefit the presence of Pac West in our midst? Pac west has not provided any real proof of their customer base. To our knowledge the hidden costs of the transport of raw materials aren't even factored into this over celebrated carbon offset equation. What proof or assurances will be provided that Pac West is actually selling to a customer who produces solar panels? Shouldn't the actual producer of the panels receive the tax credit, not Pac West the material supplier?

- 7) Department of Ecology: Have you noticed that at all of the Public Meetings that have been recently held regarding the scoping process that the majority of comments are not in favor of the smelter? Are you willing to show respect to the will of the community over international investors? Just because some of our elected officials became smitten to the PacWest promise and just because something may fall within “allowed limits” of pollution does not mean that local or neighboring downwind citizens welcome it or want to become a sacrificial site for the purposes and profits of PacWest.

We are long-time residents, fully employed and active in our community. As citizens we care about the future of Pend Oreille County. Our grandchildren are the 4th generation of Pend Oreille Citizens in our family. We would hope better for them than to work in a smelter when they become of age and we are very concerned about the emissions they and the rest of our citizenry will be subjected too while playing out on the school playground, backyard or going about our daily lives. Our family property goes back several decades and our legacy of what we want to leave to our future generations is being compromised by this corporation’s desire to take advantage of our resources and in the process of their activities, will make us one of the top polluters of the state.

In conclusion we call upon, the Department of Ecology to follow their mission of protection for the people, environment and public they serve who rely on their expertise. In doing so, please insist on accurate science, accountability from all parties involved and importantly, DOE accountability to the citizens of this area and to the planet as a whole. In decision making, please respond with utmost care and long term concern for the overall good for our collective future and to consider the livelihood of many not just a smelter facility. Lip service is not in our best interest and is not in the spirit and intention of maintaining a transparent democracy. Your due diligence is imperative as you carefully determine our future, we are counting on you do right by us and that of our collective legacy.

Sincerely,

Mary Sterling and Darrell Johnson
Newport, WA