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REVIEW COMMENTS ON CLIMATE-WEATHER

The Washington State Environmental Policy Act (SEPA) utilizes a checklist for scoping and analysis of environmental impacts for potential disturbances. The SEPA checklist utilizes 16 criteria to address potential disturbances. For this project, it is recommended that an additional criterion be added- CLIMATE-WEATHER. The natural and historical climate-weather needs to be addressed for this site.

1 The project plans to utilize wet wood chips as a process input. This may not be feasible for much of the year. The local climate is below freezing for part of the year. In cold weather, the chip storage buildings may become monolithic blocks of ice, which would render the chips difficult to utilize as a feed stock. In addition, the monolithic blocks of ice potentially could remain frozen long after weather warms above freezing. In below zero weather, truck loads of wet chips may freeze monolithically in the truck beds even before the loads are delivered to the plant.

Corrective Action- Ecology needs to add CLIMATE-WEATHER as an additional EIS criterion specifically as a site-specific need to reflect the local potential for severe weather.

Corrective Action- The project needs to consider weather impacts of truck loading and unloading wet wood chips, especially for below zero temperatures.

Corrective Action- The project needs to reconsider the impact of weather on the plant and process use of the wet wood feed stock.

Corrective Action- The project and Ecology may need to reconsider 365 day operations. Weather related plant shut downs may be in the feasibility of plant operations, safety, and the health of residents.

2. Roads

Area roads are subject to snow and ice storms. Weather may impact site access. Some regional roads close in the spring during the thaw so as to preserve the integrity of the roads, consequently, not all roads can be considered all-weather. Apparently, some of the roads do not have adequate seasonal structural integrity as relates to subgrade, base, subbase, foundation materials, and drainage.

Corrective Action- The permit should provide for shutting down the plant when road conditions are not supportive of heavy truck traffic. The EIS should contain criteria for shutting down heavy truck traffic.

3. Atmospheric Inversions

The mountain valley geography of the region is subject to seasonal air inversions that trap stagnating air in valleys. Consequently, plant air emissions may accumulate to unhealthy concentrations in residential areas. These air concentrations may exceed the permitted emission rates for the plant.

Corrective action- When local air conditions are adverse, the plant should be required to shut down. The EIS should specify local conditions when the plant should be shut down for the health of residents.

Corrective Action- Ongoing air monitoring in upwind and downwind areas adjacent to the plant area should evaluate local air conditions in addition to plant impacts to air quality.

Corrective Action- The permit should designate a specific individual to determine in real time when background air quality (inversions and fire smoke) is adverse to human health with the addition of plant emissions.

4. Forest Fires and regional smoke levels

Summertime regional and local fires degrade the Newport- Oldtown air quality to hazardous levels. Corrective action- When local air conditions are adverse the plant should be required to shut down to protect residents and down winders .