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EIS COMMENTS RELEVANT TO TOTAL AREA OF THE EIS, OFFSITE TRANSPORTATION ACCESS, WETLANDS, AND CULTURAL RESOURCES

1. The EIS scoping process should be stopped until sufficient background information is generated to permit a basic understanding of what environmental areas might be impacted adjacent to the project site. Starting an EIS scoping solely on the plant area is inadequate and the process is significantly incomplete with respect to preliminary engineering planning. The area and nature of environmental impacts is not completely identified in the exiting project description. If areas for site transportation routes are not incorporated into this EIS, then a second EIS may need to be initiated to address offsite environmental disturbances.

1A. The project description identifies surface relief of 40 feet. The USGS topographic map (cultural resources report, Figure 1) suggests 80 plus feet of relief within the project area. It seems likely that over 2.5 million cubic yards will be used in leveling just on the project property, perhaps much more. This will generate a lot of dust, noise, and vibrations. The existing USGS quadrangle map (cultural resources, Figure 1) is insufficient for site planning with respect to scale, contour intervals, and details.

Corrective Action- A preliminary civil engineering onsite design is needed to determine on site impacts to grading.

Corrective Action- Water resources will be needed for dust suppression during excavation, transportation, soil placement, and compaction during the construction phase. Sources and quantities of water are needed for construction and related impacts and needs.

Corrective Action- A more detailed topographic map is needed for input to planning for the onsite project area and associated offsite alternative transportation routes.

1B. The USGS quadrangle topographical map portion provided in the cultural survey is insufficient to project if wet lands are present on the west that would be associated with the rail and road access.

Corrective Action- an initial civil engineering design is needed to determine what natural resources and specific areas will be impacted with respected to the routes and areas impacted. Grades for the rail and road need to be identified along with excavations and other engineering design features.

Corrective Action- The area on the west should be added to the scope of the EIS. Other alternative transportation access routes, i.e., in Idaho, should be added to the EIS for completeness.

Corrective Action- Re-compaction methods (such as dynamic compaction) for placed excavated soil need to be identified. Soil will need to be recompacted to an engineering specification to establish structural stability for the construction of facilities. The compaction method needs to be related to resultant ground vibrations and noise subjected on nearby, offsite, residential structures.

Corrective Action- New environmental and cultural surveys need to be conducted to address offsite areas of environmental disturbances.

Corrective Action- Land acquisition as purchases, condemnations, or leasing for transportation routes need to be identified for inclusion in the EIS.

Corrective Action- Vibration monitoring maybe necessary during the construction phase.

1C. In the event that the rail route from the west is not feasible for any number of reasons, a back-up alternative plan for truck traffic, possible rail- to-truck transfers, and rail sidings may be necessary at an offsite location to be determined. The potential offsite areas may be subject to environmental disturbances as part of the project

Corrective Action- Until a preliminary civil engineering plan and a land acquisition plan are

available and deemed feasible, generate offsite alternative plans and schematics for rail to truck transfers.

1D because the plant site area will undergo extensive excavation and fill, it is undefined what elevation the plant will be designed to be at. This will create a lot of uncertainty relative to light exposures, sound exposures, and air contaminant exposures. It seems likely that the plant will need to be located at an elevation of approximately 2230 feet. The relative elevation differences in elevations of the plant and adjacent residences will be significant to evaluating potential exposures of residents.

The residences immediately south of the south property line probably will be looking down on the plant area (probably about 30 feet below); this is significant because these residences probably will be subject to maximum light and noise levels as worst cases.

If the stack height is set too low on the back side (west) of the hill, then residences at higher elevations may be subject to undesirable air exposures.

Corrective Action- The elevation design for the plant needs to be established, as part of the civil engineering plan grading plan for the site as well as a major input to modeling of noise, light, and air exposures to the surrounding residents.
Corrective action- The selection of the stack height in the project description may be premature until relative elevations of the plant and existing residences have been determined. The stack height may need to be determined first by modelling of air dispersion.

2. The cultural resources survey of June 2018 has duplicate photos for figure 5 and 6.
Corrective Action- Add corrections for the two photographs and supply a new photo.

3. The cultural resources survey noted on a 1936 USGS topographical map (Figure 4), that there was a structure in the north east corner of the project area. However, the report did not mention an inspection or investigation of this structure.
Corrective action- Address inspections of this structure with respect to foundation, subsurface, or other aspects.

4. On the cultural report of June 2018, Figure 1 shows a north south road on the east side of the project area. Locally, this is referred to as the "Stateline Road." The potential importance of the road is not discussed.
Corrective Action- Determine the importance of the Stateline Road, use, and historical rights of access.

5. On the cultural resources report on Figure 2, structures appear to be present on the immediate south of the project area. Within the project area north of the southeast corner, there is a small light-colored circle.
Corrective Action- Determine what these structures are, who owns them, and how habitations and access might be impacted by construction and plant operations. It needs to be determined what legal rights are related to these structures and inhabitants.

6. Residents of Newport reported that there were restrictions on water use this year and last year. Withdrawal of water up gradient from Newport conceivable could impact Newport's water supply.
Corrective Action- Generate a planning report to determine if project water needs during

construction and operations will have a significant impact on Newport and Old Town city water supplies.
Corrective Action- Inventory down gradient domestic wells with respect to location, depths, and hydrologic properties in the vicinity of the two towns.
Corrective Action- Conduct hydrologic modelling to determine impacts on city and domestic wells north of the project site, as well as other nearby wells in Idaho.

7. A time line for generation of the EIS including identifying planned technical reports, modeling processes, and engineering studies and designs supporting the regulatory process would be useful for EIS planning.

8. An overall, timeline for the project showing major construction stages and regulatory processes through plant start up would be useful to understand project planning. Primavera is an example of software used for large projects, like this one.