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COMMENTS ON EIS SCOPING

1. The scope of the project has changed since the original scope letter (6-5-18). Consequently, the environmental checklist (7-26-18) under review submitted by the company is obsolete and not fully compatible with the latest project scope description.

Recommendation: Both the company and Ecology need to stablish a systems-engineering process with designated responsible individuals for the EIS process and subsequent permitting processes and documents. Baselining documents, parameters, computational systems, and models is important. For a 300 million dollar project a system engineering process is needed. A systems engineering change-control process is needed to ensure the confidence of vested interests. Ecology already uses change control processes on other projects.

Immediate Corrective Action- The check list (7-26-18) submitted by the company and currently under review needs to be revised as soon as possible to be compatible with the project description that is under review.

2. The current project description has added a water well.

Corrective Action- The checklist (7-26-18) needs to be updated to add a EIS GROUNDWATER criterion.

Corrective Action- A hydrological groundwater study that includes drilling to sampling and testing of soils to determine hydrologic properties is needed. The hydrologic properties need to be plugged into an accepted hydrologic modeling program to determine standard hydrologic impacts such as cone of depression and radius of drawdown. Modelling is needed to ensure that water supply offsite wells will not be negatively impacted. Consideration should be given to installing monitoring wells at the border of the property to determine potential offsite impacts to water levels in wells.

Corrective Action- The groundwater flow direction needs to be determined and documented by a qualified hydrologist.

Corrective Action- Add Washington state well permitting to the list of permits. The depth to groundwater, planned depth of well, and pump depth should be addressed.

3. The current project description has added an alternative of connecting to Highway 41 in Idaho.

Corrective Action- This potentially adds an impact in Idaho that might legally offer the opportunity for the State of Idaho to be formally involved in the project regulatory processes and decisions, rather than being informally involved in comity.

Corrective Action- This may add the need to add permitting of activities in Idaho.

Corrective Action- Identify structural and geotechnical properties of roads in Idaho to determine adequacy and needed construction as well as turnoff lanes that will be additive to present configurations.

Recommendation- Address seasonal and safety considerations for existing roads in Idaho as well as related limitations.

4. From included implications in the current project description, the area of the EIS may be incomplete. Installation of a rail road spur and road from the west may require offsite disturbance, grading, crossing wet lands, and potentially impacting erosion. It remains to be determined if the installation of bridges on the west may be needed. If the offsite area of impact is not established at the beginning of the EIS process, the process may be incomplete.

Corrective Action- Identify all of the offsite impacts to establish transportation links. The physical areas (acres) to be disturbed by transportation related construction should be identified and illustrated. Identify any offsite rail bridge, curves, and connections that will need to be installed on additional acreage.

Corrective Action- Include a schematic of transportation routes and topography needed to achieve a feasible grade.
Corrective Action- Consider adding an EIS criterion for grading- TOPOGRAPHY.
Corrective Action- Consider adding a criterium for impacts to offsite wet lands from offsite earth grading.
Corrective Action- Consider adding EIS criteria for EROSION and SURFACE WATER MOVEMENT to address runoff, erosion, and sediment transport to offsite properties and wet lands from grading.
Corrective Action- Consider adding offsite areas needed for lay down yards, storage or truck storage, and maintenance.
5. The project description indicates that up to 100 rail cars may be transported per day. It also proposes that rail cars will be coming in and out daily.
Recommendation- Include a schematic in the EIS to show how congestion of cars will be handled on the project site. Determine if two or more rail loops will be needed to handle incoming and out going cars. It sounds like a rail spur may be needed to store empty cars.
Recommendation- Include a schematic showing how enclosures will be planned to contain loading and unloading dust associated with rail cars and conveyors. Include initial schematics for air protection/containment from loading operations.
6. Special emphasis is needed to avoid having severe fires like the ones at the Mississippi plant. Such fires would be disruptive and result in unplanned contaminate releases.
Recommendation- identify initial plans and designs to avoid unplanned, disruptive fires. These should be addressed in the description of potential air releases and unplanned events.
Recommendation- Identify how wet wood chips will be monitored to avoid spontaneous combustion and fires.
7. It is noted that the large property in Idaho to the northeast of the project site is not forested as stated. The existing photo on the Ecology web site is small and fuzzy.
Corrective Action- Identify the land use of the property to the northeast that is in Idaho.
Recommendation- Add a clearer, expandable image of the Ecology project site and surrounding area in the Ecology web site links.
Recommendation- Add land uses for areas in Idaho to the east and southeast.
8. Identify the sources for charcoal and relate how this relates to offsite air protection and total air releases of greenhouse gases related to the project.
9. Consider adding ride sharing to reduce traffic, noise, energy use, greenhouse gases, and air pollution.
10. Consider adding berms to reduce noise emissions from the project site.
11. Consider addressing needed impact fees for the city, county, and state for water treatment, schools, roads, and related services.