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October 25, 2018

Pend Oreille Conservation District
PO Box 465
Newport, WA 99156

Grant Pfeifer, Regional Director Department of Ecology, Eastern Regional Office 4601 N. Monroe St. Spokane, WA 99205

Sent by email attachment to PacWestSiliconEIS@ecy.wa.gov

Subject: Scoping of Environmental Impact Statement - PacWest Silicon Smelter Project

Dear Regional Director Pfeifer:

By this letter, the Pend Oreille Conservation District (POCD) submits its comments to the Environmental Impact Statement (EIS) scoping for the PacWest Silicon Smelter Project.

The POCD is a subdivisions of state government. The POCD Board of Supervisors is comprised of three elected members and two members appointed by the Washington State Conservation Commission. The mission of the POCD is to protect and enhance all-natural resources including, but not limited to, air, soil, forest, wildlife, water, and land in the district through education, partnerships, and implementation using best management practices and financial/technical assistance.

Members of the POCD Board of Supervisors attended the September 18, 19 and 20th 2018 public meetings on the EIS scoping for the PacWest Silicon Smelter Project in Spokane, Newport and Priest River. At those meetings, the board members attending found themselves in concurrence with many publicly expressed comments concerning potential adverse impacts of the project on air quality, surface water quality, ground water contamination, soil quality, forest health, wildlife habitat, human health, and local infrastructure.

Due to the lack of historic air quality data and the paucity of air quality measurements for the Pend Oreille River Valley and vicinity, the POCD hopes to work directly with the Department of Ecology to build a substantial

database consisting of air quality measurements over a two-year period as part of its review of the proposed project. The data developed through air quality testing over an extended period will allow the Department of Ecology to make decisions regarding the project on a data-informed basis. Additionally, the POCD and our partners are interested in assisting the Department of Ecology in collecting air quality data via the implementation of permanent air quality monitoring stations and the development of a quality assurance plan and maintenance schedule for those monitoring stations.

Finally, the Conservation district hopes to gain a clear understanding of the disposal methods for waste products associated with the operation of the proposed smelter and how that disposal method may or may not impact local natural resources.

Sincerely,

David Marcell
District Manager
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