**Responsible Growth \* NE Washington Opposition Letter to the DNS on**

**Pend Oreille County’s Amendment CPU-18-001.**

**Dated May 13, 2019**

Responsible Growth \* NE Washington strongly disagrees with Pend Oreille County’s “Determination of Non-Significance” regarding the Pend Oreille County (POC) Comprehensive Plan Amendment Application CPU-18-001. The blanket rezone of CPU-18-001 would: eliminate the Public Land designation from the Comprehensive Plan; amend the Pend Oreille County Table of Permit Uses to establish a new “Public/Institutional Use” category; and amend the zoning and Future Land Use Map for those properties currently zoned and designated as Public Lands.

POC Amendment CPU-18-001 public land rezone will dramatically impact lands across approximately 65% of Pend Oreille county. As the “Lead Agency”, Pend Oreille County has the responsibility to conscientiously adhere to the Washington State Growth Management Act and the SEPA Handbook; and to recognize and support the values described in the current Pend Oreille County Comprehensive Plan in order to best serve the interests and welfare of county citizens and the environment.

The county’s superficial approach to completing the SEPA check list is disgraceful. Using the same repeated statement: *“This application is for a non-project action. Environmental elements for specific projects on specific properties will be identified at the time of land use application”* on 80 out of 108 SEPA checklist questions shows a disrespect for the SEPA process, and a lack of commitment to good government and the welfare of county citizens.

The county’s “Determination of Non-significance”, despite the Pend Oreille County Planning Commission’s diligent work and deliberation leading to their recommendation to deny the County’s blanket Public Land rezone CPU-18-001, further substantiates the county’s disrespect for due process and responsible government.

It is abundantly clear that the POC CPU-18-001 blanket rezone, the superficial SEPA checklist, and the “Determination of Non-significance” will facilitate the development of the PacWest Newport silicon smelter and other future deleterious projects.

According to the SEPA Handbook, “updating an existing comprehensive plan is an action that requires environmental review under SEPA.

The deletion of the Public Land designation will have a significant adverse impact on the environment if construction of the proposed Newport Silicon Metal Smelter is allowed to proceed. Therefore, an Environmental Impact Statement is essential.

Pend Oreille County did not do its due diligence in completing the SEPA checklist, which is a requirement when filling out an Amendment Application. It did not take into consideration that a SEPA is meant to “provide decision-makers and the public with information about potential impacts of a proposed action.” Pend Oreille County’s “one size fits all” approach to 65% of the Public Land in Pend Oreille County does not comply with the SEPA Handbook.

188 acres of our Public Lands are targeted for the construction of a coal burning silicon smelter capable of releasing 766,000 tons per year of Greenhouse Gases; 935 tons per year of Nitrogen Oxides; 307 tons per year of Carbon Monoxide; 649 tons per year of Sulfur Dioxide; 115 tons per year of Particulate Matter; and other toxic coal emissions. Obviously, these pollutants will have a major potential environmental impact on the air we breathe, the water we drink and use for other purposes, the soil we garden with, our forests and other plants, our wildlife, and our domestic animals.

We suggest that Pend Oreille County Commissioners re-read the current Pend Oreille County Comprehensive Plan “Statement of Values: Why We Live Here.”

On Behalf of Responsible Growth \* NE Washington

Phyllis J. Kardos, co-chair