October 26, 2018

Grant Pfeifer
Director, Eastern Regional Office
Washington State Department of Ecology
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Re: Scoping, EIS, PacWest (HiTest)

Dear Mr. Pfeifer:

Thank you for the opportunity to provide comments on behalf of Sierra Club's Upper Columbia River Group regarding PacWest (HiTest) proposed smelter that could impact significantly and adversely the environment and public health around the proposed smelter site. Entirely appropriate in beginning these scoping comments is the advice from philosopher and poet, George Santayana:

> *Those who cannot remember the past are condemned to repeat it.*

The decision by Washington State officials in Olympia and Spokane on whether to continue to "green light" and permit the proposed Newport smelter has important ethical considerations, including justice and stewardship. As noted journalist, Karen Dorn Steele, now retired, recalls from her investigative reporting on the region's mining and smelting wastes:

> I had just done a big series on the expensive and politically contentious Superfund cleanup of mining pollution coming from the Silver Valley in Idaho. The more I got into these stories – first Hanford, then the Silver Valley, and then with an eye to Trail BC and the Teck Cominco smelter, I was struck by how our entire region is vulnerable because we are remote. That's why the Manhattan Project chose Hanford. Our region is beautiful and rich with minerals – and exploited. Our region has been exploited by the government and exploited by corporations whether for weapons production or resource

extraction. So these stories – these Superfund projects – are very interesting to me. (for full interview: https://www.celp.org/karen-dorn-steele/)

As Washington State officials are fully aware, the Inland Northwest has a long and dark history of smelter pollution with damaging impacts to lands, waters, and public health. You may wish to confer with your Department of Ecology staff and files in the Department's Spokane office regarding the public health and environmental impacts of smelters near Kellogg, Idaho and Trail, British Columbia. In caring for Veterans, I've personally provided care for patients mostly from the Libby, Montana, region slowly dying from asbestosis-caused lung disease.

Further, you may wish to work closely with the region's tribes. Here is why: the region's indigenous people have often borne the brunt of mining and smelter pollution impacts in the Upper Columbia. The Coeur d'Alene Tribe, the Spokane Tribe of Indians, and the Colville Confederated Tribes are struggling with legacy mining and smelting pollution. Too often Washington State has been a weak partner or missing altogether in protecting and advocating for the common good.

Which leads to this fundamental question: Does Washington State really wish to perpetuate this dark history by permitting yet another polluter in the politically vulnerable Upper Columbia region?

We also wish to note our concern shared by many that Washington State officials in Olympia have predetermined the outcome to permit the smelter because of larger policy goals such as rural economic development. It is inconceivable, for example, that such a smelter would be located in the city of Olympia rather than "out of sight, out of mind" at the other end of the state in far eastern Washington State. America has a long and sordid history of locating polluting industry in rural and urban communities that are politically vulnerable, such as Newport. Planning documents should disclose the role of Washington State officials in encouraging the location of this smelter in Newport, and any internal communication in that decision.

Thorough and Comprehensive Study is needed

Since Washington State appears intent on moving forward with this project, the project analysis on potential human health and environmental impacts should be complete and thorough, and not limited by the proponent's budget. The analysis should fully assess, at least, potential impacts by the project, including any associated operations such as transportation, wood-chipping, and charcoal production. For the impacted human community, Washington State officials need complete information to make informed decisions. This is important for the impacted human community. This is also important for those with no voice in this decision-making process: children, future generations, fish and wildlife.

Public Health Impacts

If Washington State officials are truly intent on moving forward with this smelter, then the impacted community would benefit from convening an independent committee of scientists with expertise in public health, pulmonary medicine, and occupational disease.

As the Department of Ecology may remember, the Idaho Congressional delegation succeeded in funding a National Academy of Sciences review in a failed attempt to discredit EPA's Superfund plan of the Coeur d'Alene Basin polluted massively by smelting and mining wastes. The NAS convened its "Committee of Scientists." Efforts to pack that committee with scientists conflicted by industry money failed because of citizen vigilance. A NAS Committee of Scientists relatively free of mining industry and state bias produced the National Academy of Sciences report, *Superfund and Mining Megasites: Lessons from the Coeur d'Alene River Basin* (www.nap.edu/read/11359/chapter/2) There are lessons here, too, for Washington State officials in your current decision-making process.

For additional background on lessons from the Coeur d'Alene, you may wish to contact the Coeur d'Alene Tribe staff with whom you have worked already on that pollution problem. For additional background, I have authored a short summary that is current up to the early 2000s and encourage your review: *Purging Mining's Poisons* (waterplanet.ws/documents/000314/)

"An ounce of prevention is worth a pound of cure": why wait the years and decades for smelter-caused or aggravated human-health impacts to start walking into emergency rooms and clinics in Newport, Sandpoint, and Spokane? Better to know upfront in the decision-making process what will be the human and environmental impacts of the smelter if approved by Washington State officials.

The human health analysis should include, but not be limited to:

- Relevant baselines to include existing lung disease in the Newport region, existing mercury, dioxin, and other toxicants that will be increased by the smelter and associated processes.
- Cumulative impacts analysis of the smelter on existing baseline pollution and disease data.
- Review of pathophysiology of potential smelter-related toxicants, including routes of exposure (e.g., skin, inhalation, and ingestion through food).
- Projections of increased human morbidity and mortality caused by the smelter. This should include transportation-related injuries and fatalities.
- Impacts on psychiatric disease (e.g., depression, suicidal ideation). The analysis should recognize and include in its assessment that Veterans afflicted with PTSD may locate to rural areas and thus become vulnerable to Newport smelter impact.

Environmental Impacts

The analysis should assess impacts, both short term and long term. This should include but not be limited to:

- Energy use, and impacts of providing that energy not just on ratepayers but on the energy footprint as a whole.
- Air Quality analysis should identify all potential substances to be emitted from the smelter, and review potential impacts on the local and regional environment. The Department of Ecology should review the history and science of smelter-related air pollution – including arsenic pollution of Puget Sound from the ASARCO smelter in Tacoma, and environmental damage from air-borne toxicants from smelters in Trail B.C., Smelterville Idaho, and associated with smelting operations near Butte, Montana. The Inland Northwest has prolonged periods of air stagnation, and environmental impacts analysis will need to detail the current data, projections related to climate change, and how the smelter-generated air pollution will impact the existing air environment. Climate change-related problems such as increasing forest fire smoke will need to be addressed, including through a cumulative effects analysis
- The analysis will also need to include water quality impacts on ground and surface waters locally and regionally. Any impacts on water use and water supplies used by the community, including for drinking water, will need to be assessed and disclosed.

Cost-Benefit Analysis: independently performed

Washington State should commission an independent economic analysis to assess the real economic costs and benefits to the Newport community, the region, and Washington State.

As evidenced by the Washington Dept of Ecology's Yakima Water Plan and flawed environmental analysis bolstered by the flawed U.S. Bureau of Reclamations skewed benefit-cost analysis, benefit-cost analysis performed by the state's universities side-steps the funny numbers generated by agencies to justify the predetermined outcome of these state proposals.

Local residents and may be willing to work with you on identifying the elements that would need to be examined, including drop in Newport property values, increased health care costs, smelter-related economic damage inflicted on the ability of Newport to attract new, nonpolluting businesses, publicly-funded infrastructure to support the smelter.

Thank you again for this opportunity to comment.

Sincerely,

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