

Selkirk Conservation Alliance
PO Box 1809
Priest River, ID 83856

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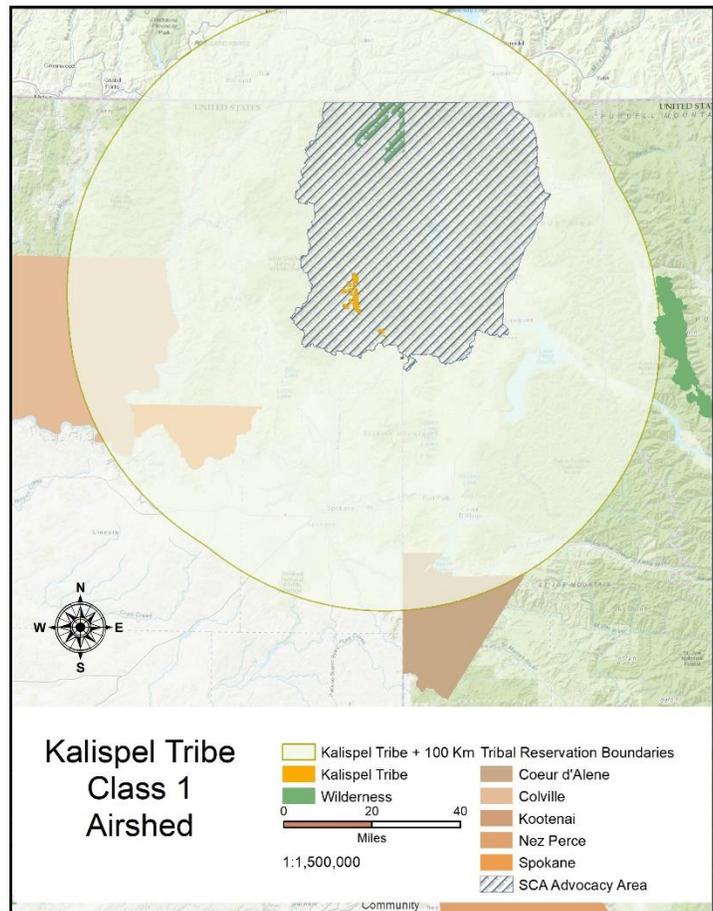
To: Environmental Protection Agency Region 10

RE: Comments in Support of the Kalispel Nation Class I Airshed Redesignation

Selkirk Conservation Alliance formally writes today it's strong support in favor of the Redesignation of the Kalispel Reservation air standard to a Class I Airshed in prevention of significant deterioration of air quality. We further endorse this action for preservation and eventual improvement and retention of high air quality for tribal lands.

Our vision statement is: "The Selkirk Conservation Alliance (SCA) is the leading and faithful advocate to all who live, love and benefit from Priest Lake and its surroundings. We are committed to understanding, supporting and protecting the environment and all living beings found here. We are dedicated to the educational programs and scientific research that support and maintain this rare and exceptional environment for future generations." Our organization has worked diligently for thirty years on this mission.

Our advocacy area is only a fraction of what was once the aboriginal territory of the Kalispel Tribe of Indians and spans most of the southern Selkirk Range and Priest Lake Basin. We are now fellow stewards of the lands once fully managed by this tribe and now partner with them to maintain the integrity of lands within and adjacent to the current tribal boundaries. Also part of the Kalispel lands is the Indian Creek Community Forest¹ where, "indicator target species benefiting from management will include mallard, breeding and wintering bald eagle, Canada goose, black-capped chickadee, yellow warbler, pond-breeding amphibians, white-tailed deer, muskrat, and beaver." This site will be a recreational, educational, and citizen science center as well as an important cultural asset to the tribe and the surrounding communities. Included in the educational program are



¹ <https://www.kalispeltribe.com/kalispel-natural-resources-department/indian-creek-community-forest>

night sky classes and camps. A large silicon manufacturer proposes to site a refinery just 5.8 miles from this project.

This region is part of a rare inland temperate rainforest. Few of these biomes exist on the planet. The habitat is suitable for Woodland Caribou, wolverine, Grizzly Bear, cougar, lynx, martin, bull trout, Kokanee, Bull Trout and many other species facing endangerment or extinction. This basin is part of three federally designated recovery and management areas: Woodland Caribou, Grizzly Bear, and Lynx. It is also a part of the Salmon and Bull trout critical areas. Plant species are innumerable - unique forest communities still exist here yet are already under threat from fire suppression practices, insect and fungal infestation, and various logging interests.

An additional threat, climate change, is the latest in challenges the region faces.² We see that impact from secondary hazards such as the increased wildfires and smoke we are now experiencing each fire season.³ Stagnant air is not uncommon during wildfire season further exacerbating the problem. What was once a few days of unhealthy air quality now persists for weeks each year. Introduction of any additional particulates and smoke will result in decreased health of all life in the region.

The proposed Pacwest Silicon Smelter is a direct threat to recovery or maintenance efforts we do every day to save the diversity of the species of the Selkirk Ecosystem. Introducing large amounts of greenhouse gasses to the area has the potential to effect an increased localized warming. This is possible due to the topographic setting of Priest Lake and Pend Oreille River valley which act as topographic "bowls," capturing fog and inversions from smoke from wildfires, smog from inland northwest cities and stagnant air. Census data shows in 2015 Pend Oreille county suffered between 78-80 stagnant air days that year.⁴ The greenhouse gasses could also stagnate here and trap heat. Warming of the area would impact the type and range of plant species that have flourished here for thousands of years. Streams and lakes will also have a potential increase in temperature, impacting the many cold-water fisheries now still present.

It is a moist region. Introduction of 760 thousand tons of SO₂ annually to the basin will result in acidification of the hydrosphere and changes to existing pH levels. Species sensitive to changes in pH include the lichen⁵ used as forage for the Woodland Caribou which are on the brink of extinction in the United States. Water pH changes will further hamper recovery of aquatic species in particular at spawning locations. Trout in particular are sensitive to acidification.^{6,7}

Soils will also be impacted: acidification of soils can result in secondary processes such as release of aluminum from compounds in the bedrock minerals. This would eventually also erode into waterways and fisheries.

The tribe has rights to current and future beneficial use of the waters in the region not only through water rights but have "federally protected fishing rights to the fishery resource in the rivers running through the reservations."⁸ Fisheries in the Columbia River and its tributaries also are co-managed by the states of Washington, Oregon and Idaho as well as four treaty tribes and other tribes that traditionally have fished in

² <https://www.nationalgeographic.com/environment/2018/10/ipcc-report-climate-change-impacts-forests-emissions/>

³ https://www.khq.com/news/where-is-the-smoke-coming-from-map-shows-wildfires-burning/article_6ef62477-9991-5e57-b747-c105e6655d31.html

⁴ <https://fortress.wa.gov/doh/wtn/WTNPortal/home/#!q0=874>

⁵ <https://link.springer.com/article/10.1007%2F978-1-4939-9810-4>

⁶ <https://prezi.com/8g2ei7q3z2ey/acid-rain-effects-on-trout/>

⁷ <https://www.epa.gov/acidrain/effects-acid-rain>

⁸ https://www.westcoast.fisheries.noaa.gov/whatwedo/sovereign_relations/

those waters. This includes protection, not degradation, of fish habitat from airborne pollution. A Class I redesignation is in alignment with these rights and assurances of species recovery and sustainability.

Not only is the redesignation important for preserving the conservation rights of the Kalispel Tribe of Indians and native species and their habitat, this action is also a preventative measure against degradation from any large industrial facilities from coming into our region seeking affordable hydropower whether a silicon or benzene refinery, for example. The science tells us that this region, with its unique location and ecology, is not suitable for such activities; impairing the forest any further will result in compounded damage compared to where we are today.

This redesignation will help the tribe maintain the integrity of their traditional hunting and gathering grounds as well as the implied conservation rights granted under the agreements with the federal government. It will ensure that we won't have to work even harder to preserve regional biodiversity in the face of global warming. It will assist in making the area a habitable and *breathable* place to live and recreate for our neighbors the Kalispel Tribe and beyond.

In light of the above conditions, we heartily support the redesignation of air quality for the Kalispel Tribe of Indians Reservation and Indian Creek Community Forest to a Class I designation.

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