

Scoping Report

for the Pacific Mountain Energy Center Integrated Gasification Combined Cycle (IGCC) Electric Generation Facility

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Prepared For:



Prepared By:





**PACIFIC MOUNTAIN
ENERGY CENTER
SCOPING SUMMARY REPORT
AND ENVIRONMENTAL IMPACT
STATEMENT
RECOMMENDATIONS**

Prepared for:

**WASHINGTON STATE ENERGY FACILITY
SITE EVALUATION COUNCIL**

Prepared by:

ECOLOGY AND ENVIRONMENT, INC.

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Summary

On September 12, 2006, Energy Northwest (Energy NW) submitted an Application for Site Certification (ASC) to the Washington State Energy Facility Site Evaluation Council (EFSEC). To initiate the ASC review process and comply with the State Environmental Policy Act (SEPA), EFSEC issued a Determination of Significance and a public notice for the Environmental Impact Statement (EIS) scoping process on October 20, 2006. A copy of the notice is included as Attachment A.

The scoping period commenced on October 20, 2006, and ended on November 20, 2006. The purpose of the scoping period was to provide public comment on the project and identify significant issues to be addressed in the EIS. Although comments will be accepted by EFSEC throughout the EIS process, the initial scoping period is intended to frame important issues and provide guidance in preparing a Draft EIS (DEIS). Ecology & Environment, Inc., (E & E) has been tasked by EFSEC to: conduct a technical review the ASC; review the scoping comments; and identify significant environmental issues to be addressed in the DEIS.

1.1 Agency Scoping, Land Use Hearing, and Public Scoping

As part of the scoping process, an agency scoping meeting, a public information meeting, a land use hearing (required under WAC 463 as part of EFSEC process), and a public scoping meeting were held on November 6, 2006, in Kalama, Washington.

Approximately 20 people attended the agency scoping meeting, including representatives from seven Washington State or regional agencies. In addition, one official from the Oregon Energy Facility Siting Council attended. Though a representative from the Bonneville Power Administration attended, no other federal agencies were represented at the meeting. The meeting was also attended by representatives of Energy NW and other interested utility officials. The meeting attendance list is included in Attachment B.

The public information meeting, land use hearing, and public scoping meeting were held consecutively on the evening of November 6th. These meetings/hearings were attended by approximately 75 people. During the informational meeting, representatives from Energy NW provided an overview of the project and responded to questions from the public; these questions are summarized below in Section 2. The transcript from the informational meeting is included as Attachment C.

WAC 463 requires a land-use hearing to determine if the project is consistent with local land use plans and regulations. The hearing is a formal process to consider evidence submitted by the applicant to determine whether the proposed project is consistent with local land-use plans and regulations. Information can also be submitted by other parties that do or do not concur that the proposed project would be consistent with local land-use plans and regulations. Although not part of the formal scoping process, information from the land-use hearing was considered as part of the E & E evaluation of environmental issues to be addressed in the EIS. The transcript of the land-use hearing is included in Attachment C.

The SEPA public scoping meeting followed the land-use hearing. Nine members of the public or representatives of organizations provided testimony on issues that should be addressed in the DEIS. The transcript of the public scoping meeting is included in Attachment C.

1.2 Scoping Comments

In addition to the scoping meetings, the public was also invited to submit written comments to EFSEC. At the close of the comment period, 39 letters or e-mails from governmental agencies, organizations, and interested citizens had been received by EFSEC. E & E's analysis of the letters/e-mails identify specific issues found the letters/e-mails included over 260 individual comments. However, many of the individual comments were similar to comments included in other letters/e-mails; so the actual number of specific issues was fairly narrow.

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Summary of Comments During Scoping Period

2.1 Public Agency Scoping

Below are questions and comments asked by attendees at the agency scoping meeting, including what they expect to be covered in the EIS. Many of the questions requested clarification and did not necessarily raise issues to be covered in the EIS.

2.1.1 Washington State Department of Transportation

1. Clearly show all areas to be used for parking and laydown operations during construction and operational phases in the EIS.
2. Safety and traffic back-ups during construction are a concern.
3. Analyze rail impacts – will trains be blocking the main line?
4. Also evaluate any impacts to passenger rail service/operations.
5. Talk to Ports of Longview and Vancouver about rail traffic impacts.
6. You mentioned Port ownership east of I-5 that may be used, how will you get people/equipment across I-5?
7. The EIS has to address three phases of the project, construction, operation, and major maintenance?
8. How will large equipment be delivered to the site?
9. Is injecting CO2 just a way to get rid of it?
10. Who will own the dock?
11. Who will operate the dock?
12. There needs to be a good sense of timing of the project relative to other projects, including WSDOT projects in the vicinity of the project, this includes both rail and highway.

2. Summary of Comments During Scoping Period

2.1.2 Bonneville Power Administration

13. There will be a NEPA nexus because of the transmission contract with BPA. It is unclear how NEPA compliance will be implemented, but will likely be separate from the EFSEC/SEPA process.
14. Upgrades of the BPA substation will be required, but until an interconnection study is completed the full extent of the upgrades is unknown.

2.1.3 Washington Department of Fish and Wildlife

15. The EIS needs to evaluate the interconnectedness of hydrology between the site and lands to the north of the site.
16. Light (shading) and noise impacts to fish and wildlife need to be analyzed.
17. EIS should clearly explain if the wetlands fill area east of the site is within or near the previous wetland mitigation area managed by the Port of Kalama.
18. What is the relationship and the status of the Port's wetland mitigation and the project mitigation?
19. Explain why the natural gas pipeline takes a circuitous route?

2.1.4 Southwest Clean Air Agency

20. Can you use a higher percentage of biomass? (reference to comment that the IGCC plant can burn pulp sludge)
21. SWCAA notes that there are some deficiencies in the ASC, and that they are working with the Department of Ecology to catalogue them and provide feedback to EFSEC. The EIS should clearly summarize emissions modeling results and control technology to be used.

2.1.5 Oregon Energy Facility Siting Council

22. What do you need natural gas for?
23. Why will the emissions not impact air quality?
24. Can you explain what "Selexol" is?
25. Where in the process will the "Selexol" process be placed?
26. How will the project be fitted "carbon capture" ready?
27. Will the sequestration be ready when the IGCC plant comes on line?
28. How much of the Blue Sky Partnership is relying on federal dollars?
29. Who will do the PSD permitting?

2. Summary of Comments During Scoping Period

30. Major air impacts will be in Oregon.
31. How will the project meet Washington CO2 mitigation requirements?
32. Airshed impacts need to be clearly assessed in the EIS, including impacts to Oregon portions of the local airshed.
33. Oregon will be conducting a certification process for an IGCC facility in the next year; this must be taken into account in the EIS cumulative impacts section.
34. The EIS should clearly outline the timing of major phases of the project: construction and operation.

2.2 Land Use Hearing and Public Scoping Meeting

The following questions and comments were summarized from the transcripts included in Appendix C. Not all of the comments are issues to be addressed in the DEIS, but they may raise points that EFSEC could consider in their overall deliberations on making a recommendation for site certification.

2.2.1 Information Meeting

1. Cost comparison of the proposed IGCC to existing nuclear power plants?
2. Cost comparison of the proposed IGCC to new nuclear power plants?
3. How many trains will be coming to the facility?
4. What happens to the mercury from the facility?
5. What is the plan for disposal of the slag from the facility?
6. How do you propose to train potential employees?
7. How will you keep mercury and sulfur from going into the river?
8. So where will the mercury be disposed at?
9. Where is the coal coming from?
10. Which facilities has the Council approved in the last 20 years?
11. Does EFSEC have a set of criteria that you use to approve the process?
12. What happens if the plant is constructed but does not operate properly and is abandoned?

2.2.2 Public Scoping Meeting

13. Should be moving in the direction of nuclear power.
14. Should not be stringent on the CO2 emissions.
15. The EIS should be comprehensive.

2. Summary of Comments During Scoping Period

16. Cumulative impacts of this plant and other plants in Washington and Oregon.
17. The EIS must address toxic air emissions and the contribution to global warming.
18. The EIS must evaluate emissions from a plant that runs on 100% petroleum coke or 100% coal.
19. The EIS should evaluate expected greenhouse gas emissions under all fuel mixes.
20. The EIS must critically assess proposed mitigation measures to meet the state carbon dioxide mitigation requirements.
21. The EIS must evaluate the statement the plant has been designed to eliminate or fully mitigate all comments, assume this applies to 100% of the greenhouse gas emissions.
22. Council should consider the financial exposure of utilities that buy into the product, project, and their customers, shareholders, and taxpayers.
23. Socioeconomic impacts are a critical part of the EIS.
24. The EIS needs to assess how the wholesale price of \$45 per MW hour factors in mitigation of carbon emissions.
25. A statewide vote is required before Energy NW can sell bonds for the project, not an issue addressed in the EIS, but want to ensure that Energy NW abides by the law.
26. The EIS must include an in-depth evaluation of construction, operation, and transportation impacts on air, water, and land.
27. The EIS must assess whether the health impacts of the proposed facility will disproportionately affect low income households.
28. The EIS must critically evaluate the applicants pledge to eliminate or fully mitigate all environmental impacts.
29. Kalama is not an appropriate place for a IGCC plant.
30. The EIS must address cumulative impacts.
31. Evaluate the ability of the proposed plant to complement renewable resources.
32. Cumulative impacts from all proposed projects in the lower Columbia River has to be addressed.
33. The EIS should evaluate both the temporary construction impacts as well as long-term impacts.
34. The EIS should include a comprehensive detailed analysis of the greenhouse gas impacts, including emissions from transportation of the fuel for the facility.

2. Summary of Comments During Scoping Period

35. Wetland impacts should be addressed.
36. It is very important for the EIS to address the visual impact on local residents.
37. Concerned that the IGCC plant will change the character of Kalama, especially the antique district, the historic connotation that the city has, the small town feel, and recreation.
38. The EIS should be comprehensive in scope.
39. What is the timetable adapting the plant for sequestration?
40. What will be the cost for adapting the plant for sequestration and what are the costs?
41. Concerned about impact on wetlands and wildlife.

2.2.3 Land Use Hearing

1. Concern about impacts on the community, including visual.
2. Question whether the Port of Kalama is sticking to its mission statement
3. The proposed project does not meet several of comprehensive plan goals, including preserving the natural scenic areas.
4. Since most of the fuel would be brought in by rail, it does not need to be built at a port so other alternative for building the project.
5. There is ambiguity whether the project is consistent with local land-use laws and regulations.
6. Potential impacts on aquifer recharge are not addressed. Columbia River aquifer recharge is a designated critical area for both the Port and the City of Kalama.
7. Wetland impacts, including those proposed by the Port, need to be analyzed.
8. Construction on aquifer recharge areas is prohibited unless hydrogeologic testing shows the impacts can be mitigated.
9. It is not clear the project complies with County regulations for Fish and Wildlife habitat conservation.
10. A flood management permit is required.
11. The applicant has not demonstrated compliance with other portions of the comprehensive plan, including open space, shorelands, historical, cultural, recreation, and shoreline uses.
12. Has a refinery like this been built anywhere else before?
13. What kind of pollution standards were set and met or were not met?
14. What kinds of pollution standards were not met?

2. Summary of Comments During Scoping Period

15. If the coal is coming from Wyoming or Montana, why is not the plant being built over there?
16. The EIS should consider land use in the region and the capacity of the region to support numerous power plants.

2.3 Written Comments Received During the Scoping Period

During the open comment period, EFSEC received 39 comment letters, faxes, or e-mails. E & E reviewed each written submittal and identified individual issues raised within each written comment. These individual comments were coded, so they can be identified with each written submittal; they were also coded to identify the basic issue raised by the commenter. Based on the E & E review, there were approximately 269 individual comments. These comments are broken into categorical issues as follows:

Issue	Comments	Key Points
Air Quality	63	24 comments related to global warming
Habitat and Wildlife	29	Includes wetlands, wetland mitigation
Water	28	Water rights and wastewater
Technology Alternatives	25	Renewable energy
Mitigation	24	21 comments about sequestration
Socioeconomics	21	Cost of project, community impact
Land Use	18	Compliance with land use, alternatives
Other	15	Voter Approval Act, Comprehensive EIS
Fuel Alternatives	11	Pet coke and coal
Cumulative Impacts	11	Air quality, water
Purpose and Need	9	Justify project
Transportation	8	Railroad impacts
Health	5	Includes hazardous material
Earth	3	Geohazards
Utilities	2	Included disposal of wastes

Attachment D includes a spreadsheets listing commenters, a breakdown of the comments by issues, and coded to the written comments submitted.

3

Environmental Review of ASC

3.1 Purpose and Need

The introduction of the ASC included a summary of the project's purpose and need. However, this should be expanded to provide more in-depth background on why a base-load facility is needed in the Northwest and, particularly, why in Washington State. The purpose and need should also establish the basis for the alternative analysis.

3.2 Identifying Alternatives

A key component of an EIS includes consideration of reasonable alternatives (WAC 197-11-786) to the proposed action. A reasonable alternative is a feasible alternative course of action that meets the proposal's objective at a lower environmental cost. Alternatives may include: other means to generate power; IGCC technology alternatives; design options on the site; different operational procedures, various construction, reclamation, and closure options; and, for public projects, consideration of alternative project sites. In all cases, the "no action" alternative should be considered at a minimum. It is important to note the final action chosen by EFSEC need not be identical to any single alternative considered in the EIS, but it must be within the range of alternatives addressed in the EIS. The decision on choosing alternatives to be addressed can limit the range of mitigation or siting considerations considered by EFSEC. Guidance provided in the SEPA Handbook indicates potential alternatives identified should be measured against two criteria:

- Does the feasibility of alternatives under consideration attain or approximate the proposal's objectives?
- Does the alternative under consideration provide a lower environmental cost or decreased level of environmental degradation?

3.2.1 Alternative Power Generation

The ASC introduction included statements that other sources of power generation would not be able to meet future demands for energy. However, the statements are not supported by any quantitative or qualitative information. E & E recommends the alternative methods of producing electrical power be more thoroughly addressed in the EIS alternative section.

3.2.2 Alternative Sites

The ASC includes an analysis of alternatives for siting the facility (Section 2.19), and E & E recommends this analysis serve as the basis for evaluating alternatives in the DEIS. However, the analysis included in the ASC is neither comprehensive nor in-depth; for the DEIS, the analysis should be conducted with much more rigor. For example, the criteria in the ASC for identifying potential sites does not provide justification for the criteria nor how those criteria were used in selecting sites. The “No Action Alternative” should be addressed in more detail and be based on critically analyzed scoping comments.

3.2.3 Alternative Technology

The ASC does not discuss alternative technologies. E & E recommends the DEIS include a section on alternative energy technologies suitable for an energy generation base-load facility. This section should briefly address why Integrated Gasification Combined Cycle (IGCC) technology was chosen over other energy generation technologies that provide a base-load capability, primarily natural gas, other advanced coal technologies, nuclear, and hydropower.

E & E assumes this can be narrowed down to IGCC technology, but there are several IGCC technology providers that offer different processes and capabilities which can affect environmental impacts. The term IGCC can refer to a list of over 30 technologies or processes, but generally, for the terms of this proposal, it could refer to one or more of 12 recognized IGCC technologies that gasify a material to produce power. Although this list could be narrowed to a few, specifically considered technologies for the PMEC, those considered should be briefly discussed and, if appropriate, a rationale should be provided on why a specific IGCC technology provider was selected. If a technology provider has not been selected, the DEIS should discuss specific differences between technologies and evaluate methods which have the greater overall environmental impact.

A component of the PMEC project is the future capability to capture and sequester CO₂ in basalt formations, but, in the application, there is no discussion of sequestration alternatives nor is it clear how, when, and where sequestration would occur. There is no discussion of what if any other equipment or operational changes may be required, the overall cost, potential loss of efficiency

of implementing a sequestration component to the project. In addition, there is no discussion of potential environmental impacts from a sequestration program, such as pipeline construction, injection well(s) field construction, and maintenance of the pipeline and well field. To some degree, these issues should be discussed in the DEIS, but, since details may not be available at this time, a supplemental EIS or new EIS may be required in the future.

3.2.4 Alternative Fuels

If Energy NW narrows the alternatives to IGCC technology, E & E recommends alternative fuels be evaluated, including coal, petroleum coke (petcoke), and biomass (pulp sludge). There was considerable public comment relating to the gasification of coal versus petcoke and combinations of the two fuels. Because different fuels or combinations of fuels in the IGCC process may produce different air emissions, amount of slag, and other byproducts/waste, the DEIS should narrow the range of fuels and address potential differences in environmental impacts.

3.2.5 Alternative Site Configurations and Ancillary Project Features

The alternative analysis should evaluate different site configurations and the alignment of ancillary facilities. There may be limited alternatives to the on-site configuration of the IGCC facility, but the ASC discusses alternative natural gas pipeline routes that should be included in the DEIS. In addition, a 12-mile long transmission line would have to be constructed to connect to the Bonneville Power Administration (BPA) substation in Longview. Although the ASC indicates this would be constructed by Cowlitz Public Utility District (PUD), alternatives to the interconnection with the BPA substation and the proposed route should be evaluated.

3.3 Cumulative Impacts

In addition to direct and indirect impacts, the DEIS should also address cumulative impacts of the proposed action, past actions, and reasonably foreseeable future actions. There were numerous public comments on this issue, especially related to air quality. Although cumulative impacts could be addressed for all of the elements of the environment, the key areas for significant cumulative impacts are listed below:

1. Air Quality
2. Transportation
3. Wetlands
4. Socioeconomics

3.4 Significance Thresholds

A key factor in determining potential significant impacts is to establish quantitative or qualitative thresholds above which impacts would be considered significant. Although other less significant impacts may be considered in an EIS, the focus should be on those that are potentially significant. To emphasize this, several public comments requested that the EIS be comprehensive in evaluating impacts and not merely focused on just the significant impacts.

To evaluate the ASC for significant impacts, E & E established thresholds of significance. The thresholds are based on guidelines established by the State of California for use in applying the California Environmental Quality Act requirements, but they were modified to be specific to the State of Washington and the proposed project. In determining potential significant impacts, E & E asked two questions:

- Was there enough information in the ASC to determine significance; and
- Would potential impacts identified potentially exceed the threshold of significance?

The thresholds of significance established by E & E are listed in Attachment E.

4

Review of the ASC

E & E staff reviewed the ACS to identify potential environmental issues to be addressed in a DEIS. The review was designed not to determine if the ACS adequately addressed the requirements of WAC 463-60; rather, it sought to determine if sufficient information was available to determine significant issues or if there was insufficient information to make such a determination. E & E staff comments on the ASC are provided below.

4.1 Air Quality

ASC Comments

- Only one year, 1995, is used for ambient air modeling purposes. Verification should be made that the Department of Ecology has agreed to this assumption.
- Only odor and dust are discussed for construction emissions. Further discussion of criteria pollutants from construction is not included.
- Emissions under upset conditions are not fully discussed.
- Ongoing state and federal regulatory actions could impact evaluation of mercury emissions from the PMEC. Additional data may be necessary to ensure EFSEC has sufficient material to verify demonstration of compliance, as well as to validate potential participation in cap and trade programs. Also, Greenhouse Gas (GHG) emissions and offset information may not be sufficient to provide enough material for EFSEC to verify compliance with WAC 463-60-225.
- Air quality impacts did not take into account impacts from rail and other modes of transportation required by the project (truck and ship).
- Cumulative impacts are not evaluated.
- Carbon sequestration is not defined in detail, and potential impacts from a carbon sequestration project are not discussed.

- There is no discussion of adding equipment to provide for carbon sequestration may impact air emissions.

4.2 Geology, Soils, and Geohazards

ASC Comments

- Areas potential susceptibility to liquefaction/lateral spreading and flooding are not defined. It is expected the saturated sandy fill material draping the site would be fairly susceptible to liquefaction and possibly lateral spreading.
- Discussion of susceptibility to flooding is somewhat inconsistent. In Section 2.1.3.1, the site is described as lying between 18 and 24 feet above MSL. In Section 2.15.5, it is stated that areas below 19 feet above MSL are susceptible to a 100-year flood. In this section, the site is described as lying at 22 feet above MSL, which is above the 100-year floodplain.
- The lithological characteristics of the imported fill at the plant site are described in Section 3.1.2, although the geotechnical properties, including susceptibility/lateral spreading, are not fully described. In Section 3.1.4.1, the discussion of soils at the site is limited to discussion of native soils rather than the dredged spoils. The soil/sediment conditions under the Kalama River, under which the gas pipeline may be installed using HDD techniques, are not adequately described to evaluate potential for frac-out potential.
- The liquefaction hazard is stated to be possibly high, and the degree of settlement is quantified; however, threat of lateral spreading is not adequately addressed. Mitigation measures considered to address soil liquefaction should consider lateral spreading if future geotechnical studies indicate lateral spreading is a potential concern.
- In several instances, it is stated that specific mitigation measures will be provided in site-specific geotechnical studies. Until these documents are provided, not all conclusions and proposed mitigation measures can be evaluated.
- Potential frac-out or other impacts to sediments beneath and near the banks of the Kalama River are not considered in the ASC. It is not clear that discussion of erodibility of soils at the site addresses the dredge spoils or alluvial materials deposited naturally prior to 1980. If the USDA NRCS soil survey does not account for the presence of newly deposited materials since 1980, the discussion of soil erodibility needs to be revised to address the drape of dredged materials over the site.

- The ASC addresses the possibility of encountering preexisting contaminated sites at the site, but it does not specifically address potential contamination along the pipeline ROW or the transmission line.

4.3 Water Resources

ASC Comments

- The ASC generally makes concluding statements of no impact without providing quantitative bases for the conclusions. For example, the ASC makes the following statements without providing any data or analysis to support the associated conclusions: (i) Sec 2.5.4.1 states “[t]he present municipal water supply is anticipated to be sufficient to address growth through 2016 . . .”; (ii) Sec. 3.3 states “[t]he plant [will] have negligible impact on surface or groundwater resources in the vicinity”; and (iii) Sec. 3.3.10.2 states that “[i]t is unlikely . . . that [the cone of depression associated with the PMEC groundwater withdrawals] will impact [private wells.]”

Readers of the ASC should be able to reach the same conclusions as the ASC; therefore, the bases for its conclusions must be included.

- The ASC quantifies the expected process, sanitary, and stormwater discharges. However, the ASC does not address the potential impacts to receiving surface waters.
- The ASC qualitatively addresses impacts to surface water from stormwater runoff during upset conditions. It does not provide a quantitative assessment of those impacts or impacts from wastewater discharges. Generally, the potential impact to surface water quality from upsets related to wastewater would be low, except if the treatment facility malfunctions. The ASC should have addressed that contingency.
- There is no discussion of impacts to the timing of stormwater runoff. The quantity and speed of stormwater runoff is likely to be increased, and, from the ASC, it appears existing infrastructure can handle these changes.
- Although Washington has an approved Coastal Zone Management Plan under the Coastal Zone Management Act, Cowlitz County is not subject to that plan. However, the project could be subject to the Comprehensive Conservation and Management Plan for the Lower Columbia River.
- Although the ASC describes the quantity and source of process and domestic water, the description has significant deficiencies. First, there is a conflict between the Port of Kalama's obligation to deliver 5,556 gallons

4. Review of the ASC

per minute (gpm) and the expected peak demand of 5,826 gpm. Second, the Port of Kalama presently has water rights for a total of 3,472 gpm, with an unspecified annual volume limit. The Port of Kalama is expected to acquire rights to an additional 6,944 gpm, with an unspecified annual volume limit (“Additional Water Right”). It is not known, however, whether the Port of Kalama has acquired the Additional Water Right. Third, potential issues exist associated with the priority and annual volume limit of the Additional Water Right and whether the system is over-allocated. Fourth, the City of Kalama appears to have sufficient water (rights to 2,215 gpm with an annual volume limit of 2,284 af) to supply P MEC's domestic water needs of 50 gpm. There are, however, potential issues associated with the water supply agreement between the City of Kalama and P MEC, and the City of Kalama’s expected customer demands over the expected life of P MEC

- The project might impact the estuarine circulation of the Columbia River. Changes to the estuarine circulation of the Columbia River combined with increased pumping of the alluvial aquifer might cause adverse impacts to the alluvial aquifer.
- The process water supply, the municipal water supply, and private wells located near P MEC's process water source well appear to be located in the same alluvial aquifer of the Columbia River. As discussed previously, the ASC does not adequately address potential impacts to: (i) alluvial aquifer from increased pumping; (ii) to existing wells from increased pumping; (iii) surface water from increased pumping; or (iv) the estuarine circulation, etc., from increased pumping, reduced precipitation infiltration, increased freshwater discharge, and increased thermal discharge. It appears the ASC assumes the impacts to be insignificant due to the large volume of flow associated with the Columbia River.
- The ASC generally does not identify the federal, state, or local statutes, regulations, or policies governing water supply, discharges, pumping, or impacts to waters of the U.S., State of Washington, or coastal zone.
- The ASC generally addresses how P MEC will comply with water quality requirements during construction and operation. The ASC does not adequately address how P MEC and the Port of Kalama will comply with Washington Water Law in: (i) changing the use of the Port of Kalama's existing water rights; and (ii) acquiring additional water rights for use by P MEC.
- Perhaps the most significant potential impacts from this project are related to: (i) the increased volume of surface water runoff; (ii) the increased volume of discharged waste water; (iii) the impact of pumping on the surface water bodies; and (iv) the increased thermal load associated with

the discharged wastewater and their impact on the estuarine circulation of the Columbia River and/or the associated alluvial aquifer.

- The ASC generally identifies mitigation measures for impact to water quality and some superficial water quantity issues. As discussed above, it does not address mitigation measures for impacts from: (i) thermal load associated with the increased discharge; (ii) changes to estuarine circulation of the Columbia River; and (iii) impacts to the associated alluvial aquifer. Similarly, the ASC assumes there will be no adverse impacts to the water supply aquifer (which is the alluvial aquifer associated with the Columbia River) or to the neighboring private wells.

4.4 Habitat, Wildlife, and Special Status Species

ASC Comments

- The ASC does not provide details on aquatic species, except federally-listed threatened/endangered fish.
- There is no discussion of impacts related to biodiversity in the project vicinity.
- The ASC does not mention if critical habitat designated by the city or county, or if WDFW priority habitat exists (except for along the railroad spur) for wildlife or aquatic species for all aspects of the project.
- The ASC discusses impacts to wetlands but does not thoroughly address their significance to the ecosystem in the project vicinity.
- The ASC does not adequately describe mitigation for wetlands.
- There is no discussion on non-native wildlife and aquatic species in the project vicinity.
- There was no discussion of how the construction of a ranney well to withdraw water would impact habitat and wildlife.
- There was no discussion how extending the pier to accommodate ships delivering coal or pet coke would impact habitat or wildlife.
- There was no discussion of potential impacts on habitat and wildlife from the proposed transmission line.

4.5 Land Use, Recreation, and Visual Resources

ASC Comments

- There is no discussion of indirect or cumulative effects on land-use patterns.
- There is no discussion on whether the wetland fills for the pipeline and railroad spur would be consistent with the Cowlitz County CAO, other than stating a critical areas permit would be necessary.
- Operation impacts to recreation are not sufficiently covered.
- There is little discussion on visual quality, even though these criteria are used to determine visual sensitivity in this analysis. Residential viewers have different sensitivity levels (WA is M and OR is H), despite similar distance to the project.
- Section 4.2.3.3 is said to discuss visual contrast, but the actual change created that would be visible from the project is not discussed.
- No simulations are included. A rendition is included as Figure 2.3-2, but it does not show how the facility would be seen from sensitive viewpoints.
- The last bullet on page 4.2-22 discusses the emission stacks would be painted with earth tones. However, in section 4.2.2.3 (Light and Glare), it is stated all elements would be painted earth tones except the emission stacks. It is said they would be painted a hue of gray instead.

4.6 Socioeconomics and Housing

ASC Comments

- The ASC does consider possible changes in the local population due to the proposed action during both the construction phase (p. 4.4-16 Population and Housing Impacts) and the operational phase (p. 4.4-21 Population and Housing Effects). The population change during the short-term construction phase would have a Potentially Significant Impact. During the operational phase, the impact on population can be classified as Less Than Significant Impact, as the small potential increase could be absorbed and accommodated by available resources without taxing them at the margin.
- To address potential impact issues, such as Environmental Justice, it would be useful in the ASC to show the locations and compositions of the relevant census tracts within Cowlitz County that the proposed project

would potentially affect. By footprint, it would be useful to have a map/figure showing both the proposed plant location and incoming natural gas pipeline extensions, outgoing power transmission lines, and rail spur superimposed over the relevant census tracts. What census tracts would be bisected or traversed by the natural gas pipeline corridor area that would tie into the plant? Furthermore, what census tracts would be bisected or traversed by the proposed rail spur? Once all available census tracts are identified for the project footprint (both PMEC and the pipeline-combined area), a population/demographic and racial composition table could be created. This table would identify and document if any minority or disadvantaged populations that could potentially be impacted by the project.

- The ASC does not consider the cumulative impacts of other concurrent construction projects being carried out simultaneously in the vicinity.

4.7 Public Services and Facilities

ASC Comments

- The ASC describes the public services and facilities that would be impacted, but it does not describe the potential impact for fire protection and other emergency services.

4.8 Hazardous Materials and Waste Management

ASC Comments

- The ASC refers to an EMS system that addresses pollution prevention, but no details are given nor is EMS documentation provided as an appendix. No waste minimization options are presented.
- The ASC addresses slag handling, storage, and disposal methods, although not enough information is provided to make a complete determination on potential impacts. The ASC addresses mercury removal from the syngas via carbon adsorption, but no information is provided on storage or disposal of spent activated carbon containing mercury. The ASC addresses mitigation measures if soil contamination is encountered during construction. A potential significant impact to be noted is the project could result in large amounts of waste material (slag) being stored on site if disposal and/or resale options are limited.
- The ASC does not specify disposal options for mercury recovered from the process.

- Generally, waste streams are identified; however, no projected waste generation rates/quantities are identified. This is needed, especially for slag.
- There is no discussion in the ASC that identifies if RCRA or Dangerous Wastes would be generated or stored at the facility.

4.9 Transportation

ASC Comments

- Parking during construction was not addressed, especially during the peak period when 1,400 construction workers arrive on a daily basis for 12 months.
- There is no discussion on construction laydown requirements or how traffic would flow from the construction laydown areas and construction worker parking to the construction site.
- There is no discussion about potential rail impacts from approximately six unit trains per week entering or leaving the facility.
- There is no discussion on how handling up to 1,500 tons per day of slag will affect road or rail transportation.
- There is no discussion of how up to 325 tons of sulfur per day would be transported off-site or the potential impacts.
- The ASC states the existing pier will be extended to provide for coal or other fuels to be delivered to the site, but there is no discussion of potential impacts from increased ship traffic on the Columbia River.
- There is no discussion of potential cumulative impacts from other highway or rail transportation projects occurring during the project's construction period.

4.10 Cultural Resources

ASC Comments

- The ASC does not address contingencies if unanticipated cultural resources are encountered during construction.

4.11 Safety and Human Health

ASC Comments

- The ASC states that safety procedures and impacts will be addressed in an Emergency Plan (not provided). No details are provided in the ASC itself.
- Potential impacts to minority and low-income populations are not addressed.
- The ASC does not identify a reasonable spectrum of potential accident scenarios that could occur over the life of the proposed action, including the maximum reasonably foreseeable accident.
- The ASC does not identify potential increases in electromagnetic fields from either the on-site electrical equipment or the proposed transmission line.

4.12 Noise and Vibration

ASC Comments

- The ASC does not evaluate a worst-case scenario
- The ASC does not consider cumulative impacts of increased noise from the project or from increased rail and highway noise.

5

Potentially Significant Issues

Potentially significant issues that should be addressed have been identified through the public and agency comments, and using the significance thresholds as guidance to determine if an information need for EIS is a significant issue.

E & E recognizes the significance of a potential impact is often a qualitative judgment based on numerous factors, including the duration and intensity of the impact to a sensitive receptor. However, our recommendations are based on comments from agencies and public, and on the review of the ASC by E & E staff. While we have included all recommendations for the EIS, those expressed in *italics* represent the most significant issues or those relating directly to one or more of the significance criteria.

5.1 Air Quality

Recommendations for EIS

- *Five-year average ambient air data, if available, should be used for modeling and estimation of air impacts in the EIS.*
- Construction equipment emissions should be estimated and included in the EIS discussion of air impacts.
- The EIS should include a comprehensive discussion of potential upset conditions and the resulting impacts to air quality.
- Mercury control technology should be fully explained in the EIS and identified as mitigation for air impacts.
- *Cumulative impacts should be evaluated.*
- *Identification and quantification of other major air emission sources in the region should be included and discussed under cumulative impacts in the EIS.*

5.2 Geology, Soils, and Geohazards

Recommendations for EIS

- *Liquefaction and/or lateral spreading from a seismic event could result in a potentially significant impact and should be thoroughly analyzed in the EIS.*
- *Flooding represents a potentially significant impact; the EIS should clearly identify the flooding probability for all portions of the project site and describe any mitigation proposed to reduce impacts from flood events.*
- The EIS should analyze the potential for frac-out in the Kalama River associated with the gas pipeline installation, and estimate impacts to water quality and aquatic species from such an occurrence.
- The potential impacts associated with encountering hazardous materials during gas pipeline and transmission line construction should be evaluated in the EIS.

5.3 Water Resources

Recommendations for EIS

- The EIS should include an assessment of the facility's expected lifetime and discuss impacts, water demands, and supplier demands over the lifetime of the facility. That discussion may need to include some discussion of the possible impact of climate change on the available water supply.
- The EIS should provide a quantitative assessment of the potential impacts to surface water quality from stormwater and wastewater discharges under upset conditions and address the malfunctioning wastewater treatment plant contingency.
- The EIS should identify the applicable water bodies as waters of the U.S. or State of Washington.
- *The EIS should include discussion of: (i) the status of the Additional Water Right; (ii) the priority and annual volume limit of the Additional Water Right; (iii) the annual volume limit of the existing water rights; (iv) the present uses and long term commitments of the existing water rights; (v) the amount of water that could be made available to PMEC through a change-of-use proceeding for the existing water rights; and (vi) the degree of over-appropriation of the system.*

- *The EIS should address potential cumulative water quality and quantity impacts to the Columbia River and the associated alluvial aquifer.*
- The EIS should contain a quantitative analysis of the impact to the estuarine circulation and the alluvial aquifer.
- The EIS should include a discussion of the change-of-use requirements and an assessment of the amount of water that would be made available to PMEC following a change-of-use proceeding.

5.4 Habitat, Wildlife, and Special Status Species

Recommendations for EIS

- The EIS should include a discussion of impacts to all wildlife and fish species, not just federally listed species.
- *If critical or priority habitat other than wetlands is present in or near the project site, this should be identified in the EIS.*
- *Wetlands and proposed mitigation need to be described in more detail in the EIS, including wetlands impacted by draining or limiting hydrologic continuity with their water sources, and wetlands impacted by the port.*
- *No information is included in the ASC on potential impacts to wetlands from the proposed transmission line.*
- The EIS needs to have a comprehensive discussion of cumulative impacts to fish and wildlife, taking into account other development projects along this portion of the Columbia River.
- *The EIS should address potential impacts from construction of the ranney well, extension of the pier, and the transmission line.*
- *Non-native mosquito fish have been a big issue with WDFW and was a point made in their comment letter. Should the EIS address this through a discussion of methods to prevent a release of this species to other areas? Could another bullet be included such as: The EIS should address issues related to non-native invasive species and what actions will be taken to prevent invasive species from entering other areas.*

5.5 Land Use, Recreation, and Visual Resources

Recommendations for EIS

- The EIS should address how development at the site, despite it being zoned industrial, might affect adjoining lands not zoned as such.
- A full description of operational impacts of the facility is needed (e.g., noise, restrictions on boat navigation/water related recreation on the Columbia River, any possible restrictions related to the pipeline being placed within the dyke and people walking above it as a recreational trail, etc.). Another direct impact is to viewers aboard Amtrak Cascades for the purpose of recreation.
- *The EIS should provide measures for any potential loss of recreation from the presence of large fuel-carrying vessels berthing in the river, possible closure of the dyke trail due to pipeline safety/security concerns, referral of readers to visual resource section regarding views from Amtrak Cascades, and any potential screening of views to this recreation-related viewpoint.*
- A full inventory/discussion of methodology of visual quality is necessary for the EIS. Since no federally managed land is included in the project, visual quality determinations should be removed. Views from Amtrak Cascades and Kalama Sportsmen's Park need to be included in this analysis.
- The EIS should include a comparison of how views would change from the proposed project. For example: “The existing steel plant has the appearance of several large rectangular buildings. The introduction of the project would result in two round domes used for fuel storage. These 80-foot-tall domes would be prominently visible to nearby sensitive viewpoints because they greatly visually contrast with the existing steel mill next door.”
- A new analysis should be prepared for the EIS that bases visual sensitivity on use volume, user attitude, and duration of view (per BLM Visual Resource Management). The revised visual sensitivity of viewers should be: Residential viewers – H; Highway viewers - M to L; and Recreation viewers - H. Distance zones from viewpoints and visual contrast levels should then determine impact levels, not visual quality.
- The EIS should have consistent mitigation measure for light and glare (painting stacks a hue of gray instead of an earth tone).

5.6 Socioeconomics and Housing

Recommendations for EIS

- Socioeconomic data could be presented in the EIS in a manner that makes the impact analysis more informative. A helpful evaluation would have been to show a comparison of the relative population influx, especially during peak construction times, compared to the City of Kalama's projected total population. This is a temporary, short-term, potentially significant impact, and it is relevant to issues such as traffic congestion during rush-hour times and potential strains on road/highway capacities and infrastructure from related truck traffic, etc., and incremental infrastructure costs and fiscal impact analyses, etc., to the host locality.
- The IMPLAN model was used; however, not all outputs were shown. Other outputs from this model besides value-added additions to gross state product and jobs are: total industrial output (business sales), and labor income and employee compensation and tax revenues (federal and state/local). Total tax revenues are derived from the initial direct spending amounts entered into the model. Since these other outputs are automatically generated by the program, they should be summarized in the EIS.
- The EIS needs to include an explanation as to why there are no indirect effects figures and only induced effects figures, shown in Table 4.4.18, to summarize the economic impacts during operations by sector. The supply chain should show the indirect industries that would be stimulated by the initial direct expenditures from payroll and other operational spending and procurements. The table shows the induced impact (effect from spending by impacted households and wage spending along the supply chain), but it does not include the indirect impact from other interdependent industries and suppliers reflecting their spending on inventory replenishment, etc. This should be checked or explained more clearly in the EIS.
- The EIS should include additional analysis to identify development or proposed development that will be undertaken within the Project's region of influence during both the construction phase and over the useful life of the Project. Should future plans for carbon capture additions to IGCC plant also be addressed? Will any CO₂ pipelines be created? If so, when and where? Which geologic formations are being considered for storage, and where are they located?

5.7 Public Services and Facilities

Recommendations for EIS

- The EIS should provide more information on the direct, indirect, and cumulative impacts on public services, such as fire and other emergency responders.

5.8 Hazardous Materials and Waste Management

Recommendations for EIS

- The EIS should identify any waste minimization practices that will be used.
- Each waste stream should be quantified in the EIS.
- *More detailed information on waste disposal of all major waste streams should be included in the EIS, including slag, sulfur, and mercury. It should be clear how long Energy NW expects these waste streams to be stored on-site prior to disposal under normal circumstances.*
- The EIS should identify if any waste streams will be RCRA Hazardous Waste or Washington Dangerous Waste.

5.9 Transportation

Recommendations for EIS

- *The EIS should address potential rail impacts from approximately six unit trains per week entering or leaving the facility. This should include the recent announcement from TransAlta that the Centralia Power Plant will be importing coal by rail from the Powder River Basin. There should be a thorough analysis of impacts on the rail system in Western Washington and through the Columbia Gorge.*
- *The EIS should address all potential impacts of facility operation including unit trains, ships, and trucks for the delivery of fuel and transport of slag and sulfur off-site.*
- *The EIS should address construction worker parking and construction laydown requirements as well as transportation to these sites and the project site.*

- The EIS should include cumulative impacts from other potential transportation projects, other major construction projects (including Oregon), and other significant new additions to the highway or rail system in the project vicinity. This would include TransAlta's announcement that they will begin shipping coal in unit trains to the Centralia generating facility from the Powder River Basin.

5.10 Cultural Resources

Recommendations for EIS

- The EIS should describe actions to be taken if cultural resources are encountered during construction.

5.11 Safety and Human Health

Recommendations for EIS

- The EIS should describe safety or health impacts to minority and/or low-income populations.
- *The EIS should include some level of risk assessment addressing potential accident scenarios at the facility and use the assessment results to predict impacts to the natural and human environments.*
- Impacts associated with increased exposure to electromagnetic fields from electric transmission infrastructure should be included in the EIS.

5.12 Noise and Vibration

Recommendations for EIS

- The EIS should include worst-case construction noise for construction.
- An evaluation of the pipeline construction noise and vibration should be included in the EIS.

6

Outline of Draft EIS

An EIS can take many formats, and SEPA allows a significant amount of flexibility in the EIS format. SEPA allows an EIS to focus on significant issues; however, E & E recommends the PMEC EIS cover all elements of the natural and human environment. This would provide basic information for the public and justification for direct, indirect, and cumulative impacts that are less than significant. However, for significant issues, Energy NW should provide a thorough analysis of the issue(s), including mitigation proposed to avoid, minimize, or mitigate impacts. A general format for an EIS is provided below:

Fact Sheet

Table of Contents

Glossary of Terms and Acronyms

1. Introduction and Summary: Briefly state the proposed objectives, purpose and need, alternatives, impacts, mitigation measures, and significant adverse impacts that cannot be mitigated.
2. Proposed Action: Includes a brief description of the proposed technology and summarizes the proposed construction and operation of the PMEC.
3. Alternatives
 - 3.1 Location
 - 3.2 Technology
 - 3.3 Fuels
4. Affected Environment, Environmental Consequences, and Proposed Mitigation
 - 4.1 Earth
 - 4.2 Air
 - 4.3 Water
 - 4.4 Habitat and Wildlife
 - 4.5 Environmental Health
 - 4.6 Land Use



4.7 Transportation

4.8 Public Services and Utilities

5. Appendices

A

EFSEC Determination of Significance and Scoping Notice

A. EFSEC Determination of Significance and Scoping Notice

**DETERMINATION OF SIGNIFICANCE
and
SCOPING NOTICE**

Pacific Mountain Energy Project - Application No. 2004-01

Description of Proposal: Pacific Mountain Energy Center, Application No. 2006-01. Energy Northwest, (Applicant) is proposing to construct and operate the Pacific Mountain Energy Facility (PMEC). The PMEC is an Integrated Gasification Combined Cycle (IGCC) power generation facility that will use fuel flexible gasification technology and processes to produce approximately 600 megawatts of electrical power. The preliminary design is based on a wet slurry gasification process. In this process feedstock such as petroleum coke and/or coal are crushed and mixed with water to form a slurry. The slurry is combined with high purity oxygen in the gassifiers to form a synthesis gas. The synthesis gas is then used to fuel combined cycle combustion turbines to generate electrical power.

Associated with the project will be an enclosed fuel handling and storage terminal, a looping railroad spur, and natural gas pipe line. The natural gas lines will travel and connect with the Williams Pipeline at the Deer Island Natural Gas Pressurization Station, approximately five (5) miles south of the PMEC.

Electrical transmission will be provided from the site by Cowlitz County PUD through approximately twelve (12) miles of high voltage transmission lines constructed within the PUD's existing transmission line right-of-way.

The Port of Kalama will supply approximately 9,400 acre-feet of process water per year to the PMEC through the Port's existing water right.

Proponent: Energy Northwest, PO Box P.O. Box 968, Richland, WA 99352-0968

Location of Proposal: The PMEC would be located at the Port of Kalama, in Cowlitz County Washington. The natural gas pipeline will travel adjacent to Hendrickson Drive south to the Deer Island Natural Gas Pressurization Station. The high voltage transmission line will travel from the PMEC along an existing Cowlitz County PUD right-of-way to the Bonneville Power Administration's Longview substation.

Lead Agency: Washington State Energy Facility Site Evaluation Council.

EIS Required: The lead agency has determined that this proposal is likely to have a significant adverse impact on the environment. An Environmental Impact Statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared. An Application for Site Certification has been submitted by the proponent and is available for review at the EFSEC office. Copies have also been provided to Cowlitz County, the City of

A. EFSEC Determination of Significance and Scoping Notice

Kalama, and to local libraries. The Application and other materials indicating likely environmental impacts are also available at EFSEC's web site at www.efsec.wa.gov.

The lead agency has identified the following areas that will likely be discussed in the EIS: Earth; Plants and Animals/Fisheries; Water Resources; Hazardous Materials; Energy Use/Conservation; Population and Housing; Socioeconomic Conditions; Cultural Resources; Aesthetics/Design; Parks and Recreation; Transportation; Air Quality; Water Quality, Noise; Public Services; and Utilities.

Scoping and Scoping Meeting: Agencies, affected Tribes, and members of the public are invited to comment on the scope of the EIS. Interested persons or organizations may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Public comment may be given in writing or in person as follows:

Written comments should be mailed to the Responsible Official:

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172
Via facsimile to (360) 956-2158;
Via e-mail to efsec@ep.cted.wa.gov.

Oral comments will be accepted at a **Public Scoping Meeting: November 6, 2006, 6:00 to 9:00 p.m.** to be held at:

**Kalama Community Building
126 N 2nd St
Kalama, WA 98625**

The meeting will begin with an Open House at 6:00 p.m., followed at 6:30 p.m. with informational presentations, a formal Land-Use Hearing at 7:30 p.m., and a formal scoping meeting pursuant to the requirements of the State Environmental Policy Act after the conclusion of the Land-Use Hearing.

All scoping comments must be **received in the EFSEC office no later than November 20, 2006**. Written comments may also be submitted at the November 6, 2006 meeting.

Responsible Official
Energy Facility Site Evaluation Council

Date: _____
Allen J. Fiksdal, EFSEC Manager
EFSEC, P.O. Box 43172, Olympia, WA, 98504-3172
(360) 956-2121

A. EFSEC Determination of Significance and Scoping Notice

October 20, 2006

Subject: Proposed Pacific Mountain Energy Center Power Project

Dear Interested Person:

On September 13, the Washington State Energy Facility Site Evaluation Council (EFSEC) received an Application for Site Certification for the Pacific Mountain Energy Center Power Project. Energy Northwest, a joint operating agency comprised of twenty public utilities submitted a request to construct and operate a 600 megawatt electrical generation facility located on 95 acres at the Port of Kalama, in Cowlitz County, Washington.

As required under state law, Energy Northwest has requested certification of the Pacific Mountain Energy Center Power Project. Under Washington State law, EFSEC is responsible for siting and licensing the construction and operation of major energy facilities in Washington State, including this project. EFSEC is beginning its review process as required by Chapter 80.50 Revised Code of Washington and Title 463 Washington Administrative Code (WAC). Under WAC 197-11-938, EFSEC is lead State Environmental Policy Act (SEPA) agency for this project.

EFSEC staff has identified your agency or organization as being a potentially interested participant in the review of this proposal. Council staff is preparing for a first public information meeting and an agency SEPA scoping meeting, both to be held in Kalama, on November 6, 2006. The agency scoping meeting will be organized to receive comments regarding the issues that should be addressed in an Environmental Impact Statement. The agency scoping meeting will be held prior to the public scoping meeting as follows:

	<u>Agency Meeting</u>	<u>Public Meeting</u>
Date:	November 6, 2006	November 6, 2006
Time:	2:00-4:00 pm	6:30pm to 9:00pm
Location:	Kalama Community Building	Kalama Community
Bldg.	126 N. 2nd Street	126 N. 2nd Street
98625	Kalama, Washington 98625	Kalama, Washington

If your organization would like to receive a copy of the application for site certification for this proposal (available in either hard copy or CD-ROM formats), or would like to be notified of future opportunities to participate in the Council's review, please contact me directly, with the name of a staff person or representative that we can add to our mailing and distribution lists.

A. EFSEC Determination of Significance and Scoping Notice

Please feel free to contact me at (360) 956-2063, if you have any questions about EFSEC's review process. Additional information about this proposal and the Council are available on our web site at www.efsec.wa.gov.

Sincerely,

Stephen Posner
Siting Specialist

cc: Interested agencies and organizations list.

B

Agency Meeting Attendance List

Attendee	Organization	Address
Sandi Edcemon	Energy Northwest	PO Box 968, MD 1035 Richland WA 99353 Oregon Department of Energy
Adam Bless	Oregon Department of Ecology	625 Marion Street NE Salem, OR 97301-3737 URS
Kathy Chaney Alan Harger	URS Corporation WSDOT	1501 4th Ave, Ste 1400 Seattle WA 98101-1616
Wess Safford	SWCAA	11815 NE 99th ST. #1294 Vancouver WA 98682
Bill Richards	Ecology and Environment	720 Third Ave, Ste 1700 Seattle WA 98104
Jim Thornton	Ecology and Environment	333 SW 5th Ave, Ste. 608 Portland, OR 97204
Mike Tribble	GFE/AGO	Po Box 40100 Olympia WA 98204-0100
Dan Porter	Energy Northwest	PO Box 968, MD 1035 Richland WA 99353
Jack Baker Charlene Andrack	Energy Northwest WA Dept of Fish and Wildlife	PO Box 968, MD 1035 Richland WA 99353
Rick Yarde	Bonneville Powers KEC-4	905 NE 11th Ave PO Box 3621 Portland, OR 97208
Scott Williams	Puget Sound Energy	PO Box 90868 Beuavue, WA 98004

C

Transcript of Information Meeting, Land Use Hearing, and Scoping Meeting

BEFORE THE STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

In the matter of:)
 Application No. 2006-01) Public Information
) and
 PACIFIC MOUNTAIN ENERGY CENTER) Scoping Meeting
 POWER PROJECT) Pages 1- 36
 _____)

A public information and scoping meeting in the above matter was held in the presence of a court reporter on November 6, 2006, at 6:30 p.m., at the Kalama Community Center, 126 North 2nd Street, in Kalama, Washington before Energy Facility Site Evaluation Councilmembers.

* * * * *

(Allen Fiksdal made introductions and Energy Northwest gave presentation.)

MR. FIKSDAL: Does anybody have any questions they want to ask after hearing the very first slide? If you can speak up and say your name.

MR. WILHELMSSEN: Larry Wilhelmsen, retired engineer. I've been involved in energy and plus other things. The question was on your very first slide you showed the projects you've been involved in starting with your run at the nuclear plant--is that it?--and then all of the ones you're doing. Do you have some indication of the operating history on the nuclear plant versus what the operating cost will be on this plant?

MR. KRUEGER: The question is: Do we have some information of the operation of the nuclear plant compared to the operation of this plant?

1 MR. WILHELMSSEN: Yes, this plant and all the
2 other alternatives. It sounds like you've been involved
3 in every available alternative energy system that
4 everybody is considering, and it would be nice to have a
5 number on the relative cost per megawatt on the various
6 systems that you have installed or are planning to
7 install.

8 MR. BAKER: I think I can probably do that
9 real quick.

10 MR. KRUEGER: Okay.

11 MR. BAKER: Our nuclear plant if you look at
12 during a nonrefueling outage year it's about two cents a
13 kilowatt hour, and on a refueling outage year it's about
14 three cents a kilowatt hour, and that's all costs other
15 than debt service. If you add debt service to that, you
16 have to add about another two cents a kilowatt hour. So
17 four and five cents, 40 or 50 mil would be the nuclear.
18 This will average at 45. We have our Packwood Hydro
19 Project that was built in 1964 and that's about 17 mil.
20 We have our Nine Canyon Wind Project that is a cost of
21 about 38 mil escalating at three percent a year; so they
22 wanted a lower end front end cost. All those other ones
23 are constant dollars. If you had a levelized wind project
24 today, it would probably cost you about 60 to 70 dollars a
25 megawatt hour. Afterwards if you want more detail, I can.

1 MR. FIKSDAL: Jack, can you identify
2 yourself.

3 MR. BAKER: I'm Jack Baker. I'm vice
4 president of Energy Business Services.

5 MR. KRUEGER: Did that answer your question?

6 MR. WILHELMSSEN: Yes. Yes, I wanted to know
7 the relative costs.

8 MR. KRUEGER: So we're in the market. The
9 market has varied between 45 and 55 over the last couple
10 years. We did get it down into the 30s for a brief time
11 in the spring of this year.

12 MR. WILHELMSSEN: Would a nuclear plant be
13 more or less?

14 MR. BAKER: A nuclear plant does come in at
15 about 50 mils; 50, 60 mils, probably that, and a natural
16 gas plant would probably be 70 or 80 mils.

17 MR. KRUEGER: Right.

18 MS. CLARK: Linda Clark. Just two
19 questions. Did you say 60 trains are going to be going
20 through or 6?

21 MR. KRUEGER: So the question is: Is there
22 going to be 60 trains or 6? And the answer is if all we
23 did was use trains to deliver all of the fuel source, it
24 would be about two or three trains a week. There's today
25 coming through Kalama is about 60 trains a day on

1 existing.

2 MS. CLARK: Then what happens to the
3 mercury?

4 MR. KRUEGER: The question is: What happens
5 to the mercury?

6 In the case that we're talking about, the
7 nice part about the gasification instead of trying to take
8 it out of this 30-foot flume like you would in any other
9 kind of power plant, we actually pass it through some
10 activated carbonized bed, activated carbon beds, and it
11 actually the carbon has a very affinity for mercury and so
12 it literally passes through and takes the mercury out.
13 We're only talking about, probably about somewhere around
14 40 pounds a year. It's not a whole bunch of mercury, but
15 it's nice to take it out. So then we have to dispose of
16 that in a managed disposal program.

17 MS. PURVIS: Yes, Cheryl Purvis. I noticed
18 when you were explaining that process that at the end
19 there is something you called inert slag and said it could
20 be used for roadbeds or those types of things. I actually
21 contacted a similar plant out of Tampa, Florida. We asked
22 some of their problems, and one of them was they
23 anticipated having buyers for that leftover byproduct, and
24 they don't consistently have it and then they're left with
25 a storage problem or trying to truck it off the site.

1 What is the plan here?

2 MR. KRUEGER: So the question is: What do
3 we plan to do with our slag or the inert slag that's kind
4 of a sand-like product--

5 MS. PURVIS: The disposal.

6 MR. KRUEGER: --and how does that compare to
7 the Tampa project where they sometimes wonder where
8 they're going to get rid of it?

9 MS. PURVIS: Right.

10 MR. KRUEGER: So the Tampa project is a
11 project that's kind of unique in that it's in the middle
12 of a large revitalization area, thousands of acres that
13 they use for mining. So it's really not close to any
14 markets; so they have a transportation problem for
15 everything they do there. But that in our case we will
16 work on some contracts. You know, it's I guess is Mark or
17 Lana here? You guys are selling sand all the time. Have
18 you had any problem getting rid of that?

19 MR. WILSON: It's probably equivalent to
20 sand.

21 MR. KRUEGER: Yes, so this is a sand, and I
22 think they've been selling the river dredge for many
23 years. It's used for construction purposes so it has a
24 pretty strong market, wouldn't you say?

25 MR. WILSON: I would say, yes.

1 MR. KRUEGER: Yes, sir.
 2 MR. PIPER: Ned Piper. Are you planning
 3 on--you talked about training. Is that going to be
 4 accomplished through North Columbia College or how do you
 5 anticipate accomplishing training for these new employees?
 6 MR. KRUEGER: So the question is: How do we
 7 anticipate doing the training for new employees?
 8 This is a very advanced project and so the
 9 good news is there's a simulation program. So they have
 10 simulation control rooms that will do a combination of
 11 working with the existing plants and then working with the
 12 local community college to develop that training program
 13 here locally.
 14 MR. PIPER: Great.
 15 MR. KRUEGER: Yes, ma'am.
 16 MS. SCARDIGLI: Barbara Scardigli. I heard
 17 you mention sulfur and mercury as byproducts of this
 18 process reducing this coal. My biggest concern is that
 19 you are planning this coal mine right on the Columbia
 20 River. What kind of protection is going to or prevention
 21 is going to happen to keep the sulfur and mercury from
 22 going into the river?
 23 MR. KRUEGER: So the question is we could
 24 have some mercury and some sulfur coming out of the
 25 project, and what are we going to do to make sure that

1 doesn't get into the Columbia River. Is that a good way
 2 to say it?
 3 MS. SCARDIGLI: Yes.
 4 MR. KRUEGER: All of our processes are
 5 totally enclosed like any industrial facility so the
 6 sulfur will go directly into it's a liquid form. It goes
 7 directly into rail cars that then go to a large
 8 agricultural company that turns it into fertilizer. It's
 9 not going to be laying around. It's not going to be in a
 10 position of going into or of being even able to go into
 11 the river. It goes directly into a container, and that's
 12 the same thing with the mercury. It's in a contained
 13 capsule that essentially it doesn't lay on the ground or
 14 go anywhere else. We literally can take that product and
 15 put it in managed disposal containers, and it will not be
 16 sitting on the site and will not be able to go into the
 17 river. Does that answer your question?
 18 MS. SCARDIGLI: Where does it go then?
 19 MR. KRUEGER: So the mercury it will be in a
 20 container that goes to a managed disposal site and then
 21 the sulfur again goes to a fertilizer plant and they make
 22 fertilizer out of it.
 23 MS. SCARDIGLI: Where is the coal coming
 24 from that is going to be processed here?
 25 MR. KRUEGER: So the question is: Where is

1 the coal coming from? In this particular case if we use
 2 coal which that's a secondary potential fuel because,
 3 again, like Ted mentioned our primary fuel is a petcoke
 4 which is a waste product from refining oil. So we will be
 5 using this waste product and then producing power out of
 6 it. But if we do get coal, it would be from the power
 7 river basin.
 8 MS. SCARDIGLI: Power river basin?
 9 MR. KRUEGER: So the power river basin is
 10 the largest coal deposit in the West Coast and that's in
 11 Montana and Wyoming.
 12 MR. FIKSDAL: I know there's other
 13 questions. We're going to have to get along in our
 14 presentation. You will have an opportunity later if you
 15 have comments and things that you think should be
 16 addressed in the EIS, we'll have that in the SEPA scoping.
 17 I suggest after the meeting if you really have questions
 18 to talk to Tom or Ted or any of other Energy Northwest
 19 folks and you can probably have your questions answered.
 20 MR. KRUEGER: We really appreciate the
 21 opportunity to be here tonight and please don't hesitate
 22 to pull us to the side and ask questions. We would be
 23 happy to answer anything you want. Thanks, Allen.
 24 (Mr. Fiksdal gave presentation about the
 25 Energy Facility Site Evaluation Council.)

1 MR. FIKSDAL: Yes, sir.
 2 MR. WHIPPLE: Darrel Whipple, Rainier,
 3 Oregon. Please tell me which of the facilities the
 4 Council has approved in the last say 20 years.
 5 MR. FIKSDAL: Can you go backwards?
 6 MR. WHIPPLE: Did I miss those?
 7 MR. FIKSDAL: There's a couple others, but
 8 they have not been built and they have withdrawn their
 9 permit or asked us to cancel their permit. There is two
 10 or three of those. Those are mostly natural gas fired
 11 combustion turbine projects that the Council has
 12 recommended the Governor approve and the Governor approved
 13 it, but they have withdrawn their--they never were built
 14 and they withdrew their permit.
 15 MR. WHIPPLE: Do you have a set of criteria
 16 that you use to approve the process?
 17 MR. FIKSDAL: The Council has rules that it
 18 uses that has some siting guidelines, and it has under its
 19 chapter or Title 463 of the Washington Administrative Code
 20 that provides all its operating and siting requirements.
 21 MR. WHIPPLE: Thank you.
 22 Mr. FIKSDAL: Yes, sir.
 23 MR. JOHNSON: Gus Johnson, Kalama. I was
 24 kind of curious about this big project being put in down
 25 here and it's still being, trying to be determined to its

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1 efficiency and overall, and my question then would be what
2 happens if you play with it for five years and you can't
3 operate it any further? You've got a plant sitting in
4 there. It's on a piece of ground and whatnot. Do you
5 tear it down and put it back into initial condition?
6 MR. FIKSDAL: Yes is the short answer.
7 There's a long answer also, but the short answer is yes.
8 They will have a site restoration plan, and if they are
9 going to leave it idle for any length of time, we are
10 going to ask them that they seriously tell us when they
11 expect to start up again, and if it isn't very soon, we
12 may--I don't know what the Council is going to do, but the
13 Council has authority to ask them to start the site
14 restoration process.
15 MR. JOHNSON: Okay. I just it could sit
16 there for 50 years, you know.
17 MR. FIKSDAL: We have kind of learned our
18 lesson with some other power plants.
19 We have one more short presentation. Mike
20 Tribble who is Counsel for the Environment is standing
21 back here, and I want to let him talk to you for a minute.
22 (Michael Tribble, Counsel for the
23 Environment, gave presentation.)
24 MR. FIKSDAL: This wraps up this part of the
25 informational meeting.

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1 (Informational meeting adjourned at 7:30
2 p.m.)
3 (Reconvened at 8:25 p.m. to hold scoping
4 meeting public comments.)
5 (Mr. Fiksdal gives introductory comments
6 about scoping meeting.)
7 MR. FIKSDAL: I will ask you to come to the
8 microphone, state your name and what you think the EIS
9 should address.
10 So, sir.
11 COMMENTS BY LARRY WILHELMSSEN
12 I'm not exactly sure quite where to start.
13 You guys ARE developing quite a project here, which is a
14 real good thing to look after, and you've considered all
15 the real basic considerations that you're doing a great
16 job on, but what I want to talk about tonight has more a
17 look at the total world concept.
18 I personally feel that we should be moving
19 in the direction of nuclear power primarily because the
20 overall world climate and also the climate politically
21 within the U.S. says don't put anymore CO2 in the
22 atmosphere. Now, me personally do not feel CO2 is that
23 much of a global warming product. It's something that's
24 used by our trees. So let's look at what else can be
25 causing this global warming. And I've just today and over

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1 the last week or so developed some new information that
2 you won't get in the media. You have to dig into the
3 research and find out what's been happening so I will read
4 a little bit of this to you.
5 There's a worldwide push afoot to apply the
6 best available technology for removal of SO2 and
7 particulate from the fossil fuels that we are burning to
8 remove sulfur gases. And what's the implication of this
9 going to be? It's very, very significant let me tell you,
10 and I'll give you some examples as to what the problem
11 could be.
12 There is a fellow that they do models
13 looking at greenhouse gases and looking at sulfates. I'm
14 sure some of you probably know and some of you don't know,
15 but the sulfates in the atmosphere have a cooling effect,
16 and a fellow went through and he took the present
17 emissions of sulfur gases and particulates and said if we
18 apply the best available technology to all the rest of the
19 plants that are in the world, they did a model and they
20 said over a ten-year period of time the temperature of the
21 earth would rise 1.4 degrees Fahrenheit. That's a
22 ten-year period of time.
23 Now, you look at our history. In the last
24 hundred years we have risen about one degree Fahrenheit.
25 So where are we going? I don't think CO2 is the only

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1 answer. So okay. You say, "Well, that's a theoretical
2 model." What really else do we have to show what
3 happened? There's a fellow that published the data. He
4 went from 1850 to the year 2000 and he totalled up all of
5 the sulfur gases that were in fossil fuel and it peaked in
6 the area of 1965 to 1985.
7 Well, in 1971 environmental scientists came
8 out and said the affect of carbon dioxide on warming is
9 going to be overborne by the sulfates that we're putting
10 into the atmosphere and we're heading into a period of
11 global cooling, and if we don't look out we're going into
12 an ice age. Well, that period of time coincides with this
13 peak of sulfur production. We peaked out and in 1985 it
14 started coming down pretty hard. Why? Because we had the
15 Clean Air Act that said, "Okay. We have to do these
16 things," and the sulfur that has been in the atmosphere is
17 dropping relatively sharply. It coincides with the higher
18 temperature rise that they're saying going into the--now
19 with the temperature going up.
20 The one other thing to look that confirms
21 this is in 1991 there was an eruption of a large volcano,
22 and in one year's period of time the sulfur that went in
23 there, which is about only half the full sulfur that we
24 put in for combusting our fossil fuels, dropped the
25 temperature a half degree the following year. So we're

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1 not speculating on whether the carbon dioxide is a
 2 greenhouse gas. What we're showing is that we already
 3 have proof that the sulfates that we're going to be taking
 4 out of the atmosphere is to cause global warming. So we
 5 have to be really, really serious on what's going on.
 6 The next part I think and what to do is
 7 nuclear power has the point that we don't have the CO2
 8 going in whether you believe it or not. It's relatively
 9 low in cost. We do have the problem of again with the
 10 public. They are perceived that radiation is bad;
 11 everybody gets cancer from it. So I think what has to be
 12 done in what you're publishing and what you're saying is
 13 we need to be working toward getting it straightened
 14 around on what's really going on.
 15 They just came out with another report on
 16 what the other countries with nuclear power plants, and
 17 there's a lot of them that are moving ahead of us: China,
 18 South Africa. Just in the news the other day in Northern
 19 Africa there's about four or five. So we need to be
 20 looking at nuclear power.
 21 I think by the time we change the public
 22 around and we get to the point you guys ought to probably
 23 go ahead with your plant, but I think from the state's
 24 point of view and the environmental point of view--I'd be
 25 happy to get this information to you--so I think you

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1 should back off on this CO2, greenhouse gas thing because
 2 if you go back and really look at the models that are
 3 there, they're making a lot of assumptions, and they will
 4 not tell you about the sulfates. I had to send e-mails to
 5 three or four researchers before somebody finally sent me
 6 something to verify what I thought. So I appreciate your
 7 consideration and good luck.
 8 MR. FIKSDAL: Could we get your name again.
 9 MR. WILHELMSSEN: Larry Wilhelmsen.
 10 COMMENTS BY MARC KRASNOWSKY
 11 Good evening, I'm Marc Krasnowsky. I'm
 12 communications director for Northwest Energy Coalition
 13 representing them here tonight. As many of you know the
 14 Northwest Energy Coalition is a 25-year-old multi-state
 15 alliance of more than 100 organizations, including
 16 environmental and consumer protection groups, businesses
 17 and labor unions, health and faith groups, utilities and
 18 others dedicating to meeting Northwest energy needs
 19 cleanly and affordably with bill reducing energy
 20 efficiency and competitively priced new renewables.
 21 In its application Energy Northwest suggests
 22 that the EIS for its proposed integrated gasification
 23 combined cycle facility should be limited in scope. I'm
 24 here to recommend just the opposite, a comprehensive EIS.
 25 This proposal is the first in Washington and one of the

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1 first in the nation for an IGCC facility. That fact alone
 2 means it must be reviewed critically and comprehensively,
 3 and the cumulative impacts of this plant with our proposed
 4 and permitted facilities in this state must be evaluated;
 5 and as someone said earlier across the river in another
 6 state is certainly a consideration.
 7 Now, I'm confident that the Council will not
 8 be seduced by the novelty of this proposed plant. The
 9 ability of IGCC technology to reduce criteria
 10 toxins--those are the things covered in the Clean Air
 11 Act--it's a major improvement in generating electricity
 12 from fossil fuels. No doubt about it. But make no
 13 mistake. This facility will be a new source of emissions
 14 and will significantly increase the state's contribution
 15 to global warming. The EIS must address those impacts and
 16 a host of others.
 17 Northwest Energy Coalition has prepared a
 18 comprehensive set of written scoping comments that I'll
 19 pass out to members of the Council when I'm done here, and
 20 I have copies for anyone else who's interested. If I run
 21 out, you can go to our website at www.nwenergy.org. But
 22 let me touch on a few areas that we go into in the written
 23 comments.
 24 First, Energy Northwest has been saying
 25 publicly that this will be a petroleum coke plant.

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1 Actually they say petcoke, but my dogs have had that.
 2 This is a petroleum coke plant, not a coal plant. That's
 3 what they're saying; yet, the application itself expressly
 4 says it's seeking a permit for a facility that will be
 5 fueled by up to 100 percent coal. The EIS has to examine
 6 the potential impacts from this facility whether it
 7 operates with 100 percent petcoke or 100 percent coal,
 8 including such impacts as emissions from transportation
 9 and operation and also must evaluate the supply adequacy
 10 of all the proposed fuels.
 11 Second, Energy Northwest's application
 12 indicates that the proposed plant will emit up to 4.4
 13 million tons of CO2 annually. To put in perspective,
 14 that's equal to the global warming pollution of more than
 15 650,000 additional cars on our roads. Global warming is
 16 accelerating, and its observable effects are, if anything,
 17 more dire than those predicted just years or even months
 18 ago.
 19 The EIS should calculate expected greenhouse
 20 gas emissions from the proposed plant under all fuel
 21 mixes. It also must critically assess whether Energy
 22 Northwest's proposed carbon mitigation measures meets the
 23 letter and spirit of Washington State's carbon dioxide
 24 mitigation law, which I would like to remind the Council,
 25 and you probably remember, it was designed for natural gas

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1 plants with significantly lower CO2 emissions profiles.
2 In its application Energy Northwest pledges
3 that the plant "has been planned and designed to eliminate
4 or fully mitigate all environmental impacts." We
5 appreciate this commitment. The EIS, however, must
6 evaluate the veracity of this statement which seems to
7 apply that the applicant plans to mitigate 100 percent of
8 its greenhouse emissions.
9 The facility is not being built to capture
10 and sequester CO2 emissions, and the Applicant is
11 proposing to meet the CO2 mitigation standard, at least in
12 part, through funding research and through fuel switching,
13 neither of which is a valid mitigation measure under the
14 law.
15 Third, in addition to the certain impact
16 this plant will have on our climate, whether it uses coal,
17 petroleum, or some other fossil fuel, this Council should
18 consider the financial exposure of utilities that buy into
19 the product, into the project, and their customers,
20 shareholders, and to taxpayers.
21 Socioeconomic impacts are a critical
22 component of an EIS. Carbon constraints are coming.
23 PacificCorps in its later filings is figuring a carbon tax
24 of eight dollars per ton today rising to 2.5 percent a
25 year. Over in Europe the European union that's going for

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1 about 30 dollars a metric ton and even more. The EIS
2 needs to assess how Energy Northwest's predicted wholesale
3 price of 45 dollars per megawatt hour factors in
4 mitigation of carbon emissions.
5 Fourth, we note that under state law or RCW
6 80.52 a state-wide vote is required before Energy
7 Northwest can float bonds for this project. Well, perhaps
8 not expressing the issue that would be addressed in the
9 EIS, we feel it's important to raise this issue early in
10 the process to ensure the Applicant adheres to this
11 fundamental consumer protection law.
12 To conclude, let me say that the fact that
13 something can be done does not mean that it should be
14 done. At a time when we should and we can meet our
15 growing needs with nonpolluting renewable power sources
16 and conservation we're faced with a proposal that will
17 increase emissions that harm human health and drastically
18 increase global warming pollution and to do so for 30
19 years or more, the life of a plant.
20 The EIS must include an in-depth evaluation
21 of construction, operation, and transportation impacts on
22 our air, water, and land; assess whether the health
23 impacts of the proposed facility will disproportionately
24 affect low income households, and critically evaluate the
25 Applicant's pledge to eliminate or fully mitigate all

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1 environmental impacts. Thank you for your consideration.
2 MR. FIKSDAL: Thank you.
3 Yes, sir.
4 COMMENTS BY ALLAN WISE
5 Once again, Allan Wise, Kalama citizen.
6 Eight days ago I stood with the wind turbines in Nine
7 Canyon. Energy Northwest did a good job there. It's
8 visually appealing, a good sound investment to our future,
9 good smart, good smart thing. I'm wondering about looking
10 at this project from a public perception problem. When I
11 think back you think of Tacoma and the past with its
12 smokestacks and smells, Trojan Nuclear Power Plant across
13 the river, Wah Chang down in Albany. I'm a visitor going
14 through Washington State, Oregon on the I-5 corridor what
15 do I think of the kind of things that we represent in our
16 Northwest? And I think we can do better than a power
17 plant that is visually unappealing. It just doesn't
18 belong here. I don't know whether it belongs anywhere.
19 When we're looking to the future, we ought
20 to be I hear Energy Northwest saying going into looking at
21 wave energy and things like that. Good ideas. I think
22 that's where we ought to be putting your resources. I
23 think, I hope this community thinks of Washington in an
24 environmentally responsible way that we're looking to help
25 the future. I don't need to say much about the greenhouse

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1 gas. I think that that's going to be all over this
2 project, but I would rather be when I drive down the
3 corridor, I want to see the fir trees. I don't mind
4 seeing the Space Needle in Seattle. In Kalama I like to
5 see the totem poles and the nice parks and trails. In
6 Kalama I can see downtown Kalama going by. Nice place to
7 visit. Coal plant that's not where I want to visit. I
8 don't want it to represent our area. I don't want it to
9 represent our state.
10 MR. FIKSDAL: Thank you. Anybody else?
11 COMMENTS BY CHERYL PURVIS
12 Cheryl Purvis, 756 Taylor Road in Kalama,
13 actually Kalama. I am more speaking to--I actually took
14 the time to read through that 800-something page
15 application, and I appreciate all the work that went into
16 it and a lot of thoughtful evaluation went into that. And
17 I'm really wanting to speak more to the Members of the
18 Council who are the general members of the Council who
19 look at many of these prospects in this state because it's
20 not necessarily this plant that necessarily maybe is the
21 problem. I'm concerned about the cumulative effect.
22 We've been talking about the possibility of this plant
23 coming to Kalama for a number of months now, and when then
24 in the media you hear that there are more plants, power
25 plants of different types being proposed, two more in

1 Longview, more in Chehalis, then the cumulative effect is
2 what my concern is. And that the power plants that are
3 approved or not approved I would hope wouldn't be
4 evaluated just singly but to look at the cumulative
5 effect. I mean we have a huge emitter here in this area,
6 mother nature, whose been erupting for the last couple
7 years and we don't have any way to filter any of those
8 emissions. So it's just a cumulative effect, and I would
9 ask that the Council look at the cumulative effect as we
10 approve different power plants to meet our needs; that we
11 don't just look at each one singly but what the overall
12 effect is.

13 MR. FIKSDAL: Thank you.

14 COMMENTS BY DON GODARD

15 I'm Don Godard.

16 MR. FIKSDAL: Could you spell your last name.

17 MR. GODARD: G-o-d-a-r-d. In Salem, Oregon
18 is my office and I represent the Oregon Public Utility
19 Districts, and our members some of them are looking at
20 buying output from the Pacific Mountain facility. Just so
21 you don't think I'm a complete interloper, I also managed
22 the Grant County PUD, Priest Rapids and Wanapum dams on
23 the Columbia River. I was a member of the Northwest Power
24 and Conservation Council and also administrator of the
25 Oregon Energy Facility Siting Council. So I'm familiar

1 with what you're doing here.

2 What I'd ask you to take a look at is this
3 facility's ability to compliment renewable resources and
4 here's what I mean. Public power has traditionally relied
5 on the hydroelectric system of the Northwest to meet our
6 needs. In recent years our members have developed small
7 resources that use gas from landfills, from dairy
8 digesters. We've developed a couple small hydro projects,
9 worked with their local municipalities to develop
10 co-generation. Two of them on the Oregon Coast are very
11 interested in wave generation, but the projected cost
12 presently is 250 dollars a megawatt hour, five times what
13 we're talking about here tonight. So they're very
14 enthusiastic about it and going to work on it and try to
15 make it successful, but it's an R & D effort at this time.

16 Another of our members is having to vote
17 tomorrow night asking its public if it has authority to go
18 out and buy wind energy. In Washington State you're
19 having to vote tomorrow on a renewable portfolio standard.
20 Its expected to pass as I understand it. We expect the
21 Oregon legislature also to adopt a renewable portfolio
22 standard. So one way or the other our members are going
23 to be looking at a lot of wind to meet our future energy
24 needs, and it has a lot of positive attributes. I was I
25 guess fortunate enough to be up in Eastern Washington and

1 Eastern Oregon on July 24, which was an historic hot day
2 for the Northwest that really stressed our system, and the
3 Columbia River was a mirror pond and the wind wasn't
4 blowing and the windmills weren't turning; but people were
5 turning on their air conditioners and we're learning that
6 that's a pattern. When things get very cold or very hot
7 in the Northwest, the air is very still and the wind
8 doesn't blow and can't generate power with our windmills.
9 So how are we going to provide power for people during
10 those periods of time? The historic way and the
11 intriguing way of doing that would be to use the
12 hydroelectric system. When the wind blows turn off the
13 hydro system, and when it doesn't blow turn on the hydro
14 system. That's a great idea except for salmon, and if you
15 think of the Hanford reach, that is an example of that.
16 You don't want those reds going dry or being flooded.

17 Depending on how the wind blows the hydro
18 system has a lot of constraint on it, and it's unlikely to
19 be able to what we call firm or shape wind resources to be
20 useful to customers' needs. So we're going to have to
21 turn to something, something else. The only thing that
22 comes to my mind is the fossil generation unit, something
23 like what's being considered tonight. And if it can be
24 done with what would otherwise be a waste product,
25 petroleum coke, if there are ways to sequester the carbon

1 dioxide all the better. But my comment at the end of the
2 day is to ask you to look at this kind of facility as a
3 way of firming wind resources and other renewable
4 resources. Public power as I said before has relied
5 historically on hydro power, and we don't have any
6 significant amount of resources that can be used to firm
7 power so we need something like this. Thank you.

8 MR. FIKSDAL: Thank you.

9 Yes, sir.

10 COMMENTS BY PHIL DINES

11 My name is Phil Dines. My address is P.O.
12 Box 633 Longview. I would like to commend Energy
13 Northwest on their diversity in seeking alternative fuel
14 sources through the multitude of which they've achieved
15 over the last 25 plus years. I feel that this is an asset
16 to this community not just an infrastructure. Sorry about
17 that. I lost my train of thought here. But as far as
18 alternative fuel source, I mean petcoke is a byproduct.

19 I'm a steam fitter, welder by trade. I've
20 worked at hydro plants, co-generation facilities, coker
21 units in the refineries. I've got an extensive background
22 in this. Well, your petcoke basically it's buried or it's
23 overseas currently being burned. This is far worse for
24 our environment. We can use this knowledge. Washington
25 is one of the highest ratings for environmentally-friendly

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1 states that we currently have. We have the opportunity
2 here to be first in the country to achieve this technology
3 at this development level, and I commend you for looking
4 at this site. Thank you.

5 MR. FIKSDAL: Thank you. Would anybody else
6 like to comment?

7 COMMENTS BY DAN SEARS

8 Thanks for the opportunity to comment. My
9 name is Dan Sears and I'm with Energy Options. It's out
10 of Portland. Our concern or interest in this project is
11 with certainly its relationship with renewable energy and
12 also with air quality impacts in the entire lower Columbia
13 area.

14 As you know this is not the first project
15 that's come to the lower Columbia. We're looking at three
16 LNG facilities proposed, an ethanol facility, multiple
17 additions to natural gas fired power plant electricity
18 generation and their capacity. And between all these
19 projects it's huge cumulative impacts to the air quality
20 of the lower Columbia potentially, and EFSEC in Washington
21 needs to take that into account when it looks at this
22 project. That's really one of my main concerns is that
23 the rapid industrialization of the lower Columbia through
24 these fossil fuel projects is in combination each one
25 might have a lot going for it in terms of trying to limit

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1 its fossil fuel emissions or its carbon emissions or SOx,
2 NOx, or all the different air quality things that we would
3 be concerned with, but ultimately it's very difficult to
4 tell what the end result is going to be unless EFSEC also
5 takes a hard look at all of the projects and works with
6 Oregon on the other side of the river to get a sense for,
7 you know, how projects on either side of the river are
8 going to work. I'm not sure how that's happening right
9 now. It certainly doesn't--based on what's going on on
10 the Oregon side, it doesn't seem to be happening too well,
11 at least the LNG.

12 I would add that I consider it to be costly.
13 The air quality impacts all over the lower Columbia--here,
14 Portland, and flushing all the way to the gorge--that's a
15 cost that's difficult to quantify in terms of health and
16 views, and I know that this project intends to limit that
17 as much as it can, but coal is inherently limited. Even
18 IGCC coal will be as the previous speaker said a
19 significant new source of air pollution and so that's
20 another concern we would have.

21 Again, this air flushes directly into
22 Portland and at the gorge. The EIS should evaluate both
23 the temporary impacts of constructing the facility as well
24 as long-term impacts. It should include a comprehensive
25 detailed analysis of the greenhouse gas impacts that has

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1 already been said and also include impacts from fuels
2 being used to transport the actual fuels to the project
3 here.

4 So, lastly, I would point at the wetland
5 issue. Again, it's another issue of the lower Columbia
6 from a different perspective, maybe not an air quality
7 perspective, but that's very important. Again, another
8 small but incremental insult to a river that is dealing
9 with a lot in terms of fossil fuel proposals. I would
10 suggest that these projects can compete directly with
11 renewable energy, particularly when these costs aren't
12 taken into account. So this EIS is an opportunity for
13 EFSEC to attempt to quantify these things, and if not
14 quantify, at least quantitatively state that the air
15 quality impacts cumulatively throughout the region are
16 going to be severe. Thank you.

17 MR. FIKSDAL: Thank you. Is there anybody
18 else that would like to make a comment on what they would
19 like to see the EIS address?

20 COMMENTS BY MARIE WISE

21 Hi, my name is Marie Wise and my husband
22 spoke earlier regarding the view issue which I'm not going
23 to go into detail on, but I just wanted to reiterate that
24 I think it's very important for the EIS to address the
25 issue of the view impact on people that it will negatively

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1 impact who live in Kalama.

2 There are many neighborhoods that are high in
3 the hills. People have built homes. Many homes have gone
4 up in the last couple years. Kalama has experienced
5 phenomenal growth and these homes have views. They have
6 panoramic views of the Columbia River. My husband and I
7 spent ten years building our home. We have a beautiful
8 view of the Kalama River and we hope to retire there, and
9 we don't relish the thought of looking at a coal plant or
10 a petcoke terminal or a gasification plant or whatever the
11 jargon is to call it.

12 We would like the EIS to specifically address
13 the view impact, but the other thing that I would like to
14 address is how this energy plant will impact the character
15 of the community of Kalama. The City of Kalama's
16 comprehensive plan contains many references to scenic
17 views. It also contains references that Kalama is a
18 destination for residents and visitors alike. And I'm
19 excerpting from my comments that I've already turned into
20 your comment box.

21 I would hazard to say that 98 percent of the
22 people in the room tonight are of baby boomer generation.
23 However, the people that are moving into Kalama from the
24 bigger cities because they want to get away from the big
25 city but they commute to work live here because they want

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1 to live in the small town, with a small town character,
2 and they didn't move here because they wanted to be closer
3 to heavy industrial. And we have to look ahead 20 years,
4 25 years, and examine what this coal plant, energy plant,
5 petcoke terminal or whatever you want to call it, what is
6 that going to do to the character of our community over
7 the next 25 years because the people that are going to be
8 living here then are the next generation, the billennial
9 generation, general X, and they pay a lot of attention to
10 environmental issues.

11 And my question is: Is Kalama going to
12 continue to experience the kind of growth and the retail
13 commercial development that the City of Kalama is hoping
14 will continue to grow: the antique district, the historic
15 connotation that the city has, the small town feel, the
16 recreational areas? That's all part of the character of
17 Kalama, and you have to ask yourself whether a plant like
18 this has a potential to change the character over the next
19 25 years. It changed the character for Rainier. It
20 became the town with the nuclear power plant. So do we
21 want to be the town with the energy plant? because people
22 will see it when they drive down the freeway, and they
23 might decide they don't want to live here. They might
24 decide they don't want to eat in a restaurant here. They
25 don't want to stay in the hotel here. They don't want to

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1 live here. And my children live here and I think that's
2 an important consideration that the EIS should address,
3 which is the impact to the character of Kalama. Thank
4 you.

5 MR. FIKSDAL: Thank you.
6 One more? Okay.

7 COMMENTS BY DARREL WHIPPLE
8 You've heard me already. Darrel Whipple,
9 Rainier, Oregon, representing the Willapa Hills Audubon
10 Society. We would second the motion I guess you would say
11 of Northwest Energy Coalition that the EIS should be
12 comprehensive, and we would also ask about whether there
13 is a sequestration timetable that is for the adaptations
14 that might be made to this proposed plant. What will be
15 the cost for such an adaptation and by whom will they be
16 borne?

17 We also would as generally we're all
18 wildlife watchers and are among the visitors and some of
19 the residents I guess of Kalama among our membership and
20 we appreciate the character of the Kalama that has been
21 trumpeted already tonight.

22 The wetlands that the port successfully
23 installed as a result of their process of establishing the
24 industrial land is a great plus for Kalama. I haven't had
25 a chance to investigate whether any parts of the

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1 mitigation wetland are involved in the 3.2 acres or the
2 other acreage that has been mentioned that would be filled
3 or impacted here, but I personally appreciate being able
4 to visit the mitigation wetland that is there and would
5 only want the best result for that aspect of the port to
6 be maintained. And I personally appreciate the Heronry
7 which is out there near the Peabody Green Terminal. I
8 don't know whether fish and wildlife has spoken to the
9 potential impact on the Heronry from this proposal, but I
10 hope that becomes part of the EIS as well. Thank you.

11 MR. FIKSDAL: Thank you very much. Unless
12 there is anybody else that just has a burning desire, it's
13 getting close to nine o'clock and I think everybody is
14 getting kind of tired, and these chairs I know aren't the
15 most comfortable things in the world.

16 I want to thank you very much for coming on
17 behalf of EFSEC--yes.

18 AUDIENCE MEMBER: One question. If we have
19 some research or something that's pertinent to what a
20 person said who do we send it to?

21 MR. FIKSDAL: You can send it to me. You
22 can send comments in on the land use consistency and
23 scoping until November 20. It has to arrive in our office
24 by 5:00 p.m. on November 20. You can do that either by
25 mail or by e-mail, and I think you have that information.

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1 I think a lot of the information is on this sheet, and if
2 you want, you can write your comments on this sheet and
3 drop it in the box in the front here or mail them to us by
4 November 20.

5 If you just have general information that
6 you think we need to know something, you can mail it to me
7 anytime at the Council and the address is the same and we
8 will take your comment.

9 You will also once the Draft EIS is issued,
10 you will be able to comment on the Draft EIS and we will
11 hold another public hearing or meeting down here to hear
12 your verbal comments, but written comments are also
13 welcome. We suspect or expect that the Draft EIS will be
14 out in some months from now. I don't know how many. As
15 soon as we can, but sometimes you don't exactly know how
16 long that will take, but it shouldn't be more than I would
17 guess four months, maybe two or three, in that time range
18 is our schedule, our goal.

19 So, again, thank you very much. On behalf
20 of the Councilmembers I want to thank you, and you've been
21 a very nice audience and very eloquent speakers. So until
22 we see you again, I want to remind you if you haven't put
23 your name on the mailing list and want to be on the
24 mailing list do so in the front or you can still e-mail us
25 at efsec@cted.wa.gov and thank you.

1 * * * * *

2 (Whereupon, the information and scoping

3 meeting were adjourned at 8:57 p.m.)

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5 A F F I D A V I T

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7 I, Shaun Linse, CCR, Certified Court Reporter,

8 do hereby certify that the foregoing transcript

9 prepared under my direction is a true and accurate

10 record of the proceedings taken on November 6, 2006,

11 in Kalama, Washington.

12

13

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15 _____
Shaun Linse, CCR

16 CCR NO. 2029

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1 I N D E X

2 INFORMATION MEETING PUBLIC QUESTIONS PAGE

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BEFORE THE STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

In the matter of:)
 Application No. 2006-01)
) Land Use Hearing
 PACIFIC MOUNTAIN ENERGY CENTER)
 POWER PROJECT) Pages 1 - 32
 _____)

A Land Use Hearing in the above matter was held in the presence of a court reporter on November 6, 2006, at 7:30 p.m., at the Kalama Community Center, 126 North 2nd Street, in Kalama, Washington before Energy Facility Site Evaluation Councilmembers.

* * * * *

JUDGE TOREM: We're now officially on the record for the land use hearing. My name is Adam Torem, spelled T-o-r-e-m. I'm an Administrative Law Judge from the Washington State Office of Administrative Hearings. My office is typically up in Olympia. We do have a branch office in Vancouver closer to much of you.

I've been appointed by this Council to facilitate proceedings in this matter. That includes the land use proceeding tonight and all of the varied proceedings that Allen Fiksdal told you about on the screen that are going to unfold not over the course of the next week, but probably over the course of the next six months to a year. So we don't have to have all the comments and concerns addressed tonight, but by the end of this we'll hear everything you have to say at least

1 probably twice, maybe three times.
 2 All right. Tonight this is going to be a
 3 land use hearing before the Washington Energy Facility
 4 Site Evaluation Council or EFSEC. It's pursuant to
 5 revised Code of Washington Title 80, Chapter 50, Section
 6 90 of the Revised Code of Washington. Again, Title 463 of
 7 the Washington Administrative Code and for the record it's
 8 Monday, November 6, 2006. It's a little after 7:30 p.m.
 9 Public notice of this hearing will be given in the Daily
 10 Record, and notices were also made to individual persons
 11 on the Council's mailing list. If you want to get your
 12 name added to that mailing list, see Mr. Fiksdal or
 13 contact the EFSEC staff. Later this week we'll make sure
 14 you get all future mailings.

15 This land use hearing is being held to
 16 receive public testimony, both oral and written, with
 17 regard to whether the Pacific Mountain Energy Center
 18 Project, EFSEC Application No. 2006-1, whether it is
 19 consistent with local and regional land use plans and
 20 zoning ordinances. Energy Northwest has submitted that
 21 application that Allen held up earlier, and they want to
 22 construct and operate a 600-megawatt integrated combined
 23 cycle electrical generation facility at the Port of
 24 Kalama in Cowlitz County, Washington.

25 The EFSEC rules and regulations allow for

1 the applicant to provide certificates from local
 2 authorities attesting to the fact that their proposal is
 3 consistent and in compliance with your county and regional
 4 land use plan and zoning ordinances. These certificates
 5 are regarded as what we call prima facie proof of
 6 consistency; meaning that they would be able to build this
 7 in the appropriate zoning, build it in that area after
 8 comprehensive plan, and comply with all other local land
 9 use rules and regulations. If they don't present a
 10 certificate from the county and the city, and they do not
 11 somehow otherwise demonstrate compliance with the local
 12 land use plans, then the Council will request testimony
 13 from the county as to their opposition or cooperation with
 14 this project and how it's going to made consistent. Based
 15 on that testimony if it's received today or later and
 16 after consideration of any public comments received, the
 17 Council then will make up its determination regarding
 18 zoning or land use.

19 Now, we're going to be taking comments until
 20 November 20, and that decision on land use consistency
 21 won't be made tonight, but it will be made at a
 22 continuation of this land use hearing whenever we decide
 23 to resume that, probably sometime between Thanksgiving and
 24 Christmas or depending on how long the procedure lasts
 25 shortly after the first of the year. But that's one of

1 the first things that should occur, and we will get some
 2 testimony tonight so everyone will expect and anticipate
 3 when we might know about land use consistency.

4 Tonight's procedure is going to be as
 5 follows: We're going to hear not another presentation
 6 about the whole project from the Applicant but simply
 7 something from Energy Northwest tonight as to what
 8 negotiations and agreements they may have entered into
 9 with the city and county, then we'll hear from
 10 representatives of Cowlitz County and the City of Kalama
 11 if they're in attendance tonight and wish to be heard, and
 12 finally, then we'll hear from members of the public.

13 I'm going to ask folks to come up. We are
 14 taking all this down. For the court reporter speak in a
 15 reasonably slow and deliberate pace. State your name and
 16 address when you come up and please get up from your seats
 17 and come to this microphone up front to address the
 18 Council and the court reporter can take down everything
 19 you say.

20 All right. Councilmembers may have some
 21 questions about the nature of your comments or concerns so
 22 stay at the microphone for a minute, and I'll kind of give
 23 you an indication as I look up and down the table as to
 24 whether or not the Councilmembers will have questions for
 25 you.

1 Also, there's not going to be much
 2 opportunity tonight for ongoing discussion or banter back
 3 and forth. If you state something that people agree with
 4 or disagree with, there won't be any cause for folks to
 5 cheer or boo or anything like that. This is all just for
 6 informational purposes and finding out where things stand.
 7 So when you come up tonight, if you simply want to state
 8 your name and give us a summary of what you've got, keep
 9 it to one or two, maybe three minutes at the most. If
 10 it's a longer written presentation, you can tell us the
 11 highlights and turn in that written presentation. The
 12 written will become part of the record. It's just that
 13 you won't be able to share that lengthy presentation, if
 14 I've seen some of you have those with you tonight, or with
 15 everybody else in the room unless you want to hand them
 16 out a copy. We may be able to put those kinds of things
 17 on our website under a public comment tab so folks can
 18 read them later.

19 All right. Again, remember your testimony
 20 tonight for this hearing is limited as to whether or not
 21 this proposed Pacific Mountain Energy Center is consistent
 22 and in compliance with Cowlitz County, City of Kalama, and
 23 any other regional land use plans and zoning ordinances,
 24 and because it's been a whole hour since we've done it,
 25 I'm going to ask the folks on the Council to quickly raise

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1 their hands. I'll start down to my right far end and ask
 2 them to state their name and the agency affiliation
 3 they're designated to represent.
 4 MR. TAYER: I'm Jeff Tayer. I'm with
 5 Washington Department of Fish and Wildlife.
 6 MS. WILSON: Judy Wilson, Department of
 7 Natural Resources.
 8 MR. SWEENEY: I'm Tim Sweeney with the
 9 Washington Utilities and Transportation Commission.
 10 MR. FRYHLING: Dick Fryhling with the
 11 Department of Community, Trade, and Economic Development.
 12 CHAIR LUCE: I'm Jim Luce. I'm Chair of the
 13 Council.
 14 MS. ADELSMAN: Hedia Adelsman with the
 15 Department of Ecology.
 16 MR. EATON: I'm Vern Eaton and I represent
 17 the county.
 18 MR. ERICKSON: Justin Erickson, City of
 19 Kalama.
 20 JUDGE TOREM: I'll quickly hear from the
 21 Applicant, Energy Northwest, as to their land use
 22 consistency efforts.
 23 MS. CHANEY: Do I face you or them?
 24 JUDGE TOREM: If you want to grab the
 25 microphone and turn your back to us, it might be easier.

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1 There's more people that way.
 2 COMMENT BY KATY CHANEY
 3 My name is Katy Chaney from the URS
 4 Corporation, address 1501 Fourth Avenue, Suite 1400,
 5 Seattle, Washington 98101-1616.
 6 The application for site certification
 7 consists of three pieces: the Pacific Mountain Energy
 8 Center, a 600-megawatt IGCC plant, a five-mile natural gas
 9 pipeline, and a railroad spur off the existing Burlington
 10 Northern Santa Fe rail line.
 11 We wish to enter our statement of
 12 consistency as evidenced by two letters that I believe you
 13 have in your packet: one from Cowlitz County and one from
 14 City of Kalama.
 15 The PMEC project, the railroad spur, and
 16 most of the pipeline are located in Cowlitz County. A
 17 portion of the natural gas pipeline is located within the
 18 City of Kalama. As described in a letter from Cowlitz
 19 County, the site has been designated as heavy industrial
 20 in the Cowlitz County Comprehensive Plan and the proposed
 21 use is consistent with the heavy industrial designation.
 22 A portion of the site that includes the railroad spur is
 23 within the shoreline designation of the urban district.
 24 As we described in our application on page
 25 4.2-6, urban districts are shoreline areas suitable for

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1 intensive recreation, residential, commercial, and
 2 industrial development. The objective of this district is
 3 to satisfy the socioeconomic needs of present and future
 4 population of the county. We believe as proposed the
 5 natural gas pipeline and the railroad spur that are within
 6 the urban district are consistent with the Shoreline
 7 Master Program.
 8 The last piece is the piece of the pipeline
 9 that is within the City of Kalama. As described in the
 10 City of Kalama's letter, the natural gas pipeline is
 11 consistent with the city's land use plans and we agree
 12 with that designation.
 13 JUDGE TOREM: These are letters from the
 14 mayor for the city and assistant manager for the county,
 15 and they're in the form of letters. I noticed there was
 16 some language in there that these are generally
 17 consistent, and there's proposed off-site mitigation
 18 within the shoreline jurisdiction.
 19 Is the Applicant presenting these as actual
 20 certificates that land use consistency has been achieved
 21 or are those other general consistencies still being
 22 worked out?
 23 MS. CHANEY: We're submitting them as
 24 certificates of land use consistency with the exception
 25 that we had a question too about what they meant by the

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1 off-site mitigation there because we have not designated
 2 one, and that the person that signed that letter was on
 3 leave until today and I don't know they're here tonight or
 4 not.
 5 JUDGE TOREM: I won't even attempt to
 6 pronounce Mike's last name. It's W-o-j-t-o-w-i-c-z. He's
 7 an assistant manager for the county, and when I ask if the
 8 county has representatives we'll see if he comes forward.
 9 All right. Councilmembers, any questions
 10 about the letters?
 11 CHAIR LUCE: Judge Torem, this is Jim Luce,
 12 Chair. I just would like some clarification from the City
 13 of Kalama, at least that's how we pronounce it in
 14 Vancouver. I could be wrong there.
 15 I'd like some clarification from the Mayor
 16 of the City of Kalama.
 17 AUDIENCE MEMBER: Kalama.
 18 CHAIR LUCE: Well, that shows what you learn
 19 from Vancouver. Kalama or Kalama I want to know whether
 20 generally consistent is consistent. Adverbs are great,
 21 but I want a consistency statement.
 22 JUDGE TOREM: So that may need to come from
 23 the Mayor to clarify the letter, if the Mayor is here
 24 tonight, Mr. Poulsen; and if not, maybe before the comment
 25 period closes, we can address those questions about what

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1 is generally consistent, if it's fully consistent.
 2 Ms. Adelsman.
 3 MS. ADELSMAN: I have a question. In the
 4 letter from Cowlitz County it talks about the proposed
 5 site is not zoned, and then it says such zoning
 6 consistency is a moot point but then they talk about
 7 classification.
 8 JUDGE TOREM: My understanding,
 9 Councilmember Adelsman, is that they were referring to the
 10 land use plan for the area but there are no specific
 11 zoning regulations, and we may need to have that addressed
 12 as well before we can accept this as a consistency
 13 certificate.
 14 MS. ADELSMAN: Yes.
 15 JUDGE TOREM: All right. Let me ask if
 16 there is anyone else present from the county or the city
 17 that wants to testify as to the effect of these letters
 18 tonight?
 19 Some of you may be wondering about the folks
 20 sitting to my left that are designated to sit on the
 21 Council. They're here to be deliberative members of the
 22 Council, not to represent the city or the county, per se,
 23 in its negotiations with this body. So they're separate
 24 from that and they can't stand up to do that tonight.
 25 They will be somewhat excluded from those procedures and

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1 discussions back at their respective offices; what we in
 2 the legal field call the Chinese wall. So they'll be
 3 excluded from those discussions back at home, and they're
 4 subject as Mr. Fiksdal said earlier to the same ex-parte
 5 communication rules; meaning they can't have
 6 off-the-record discussions with anybody about these items.
 7 So any discussions that they're going to have or the rest
 8 of the Councilmembers are going to have about this project
 9 will take place where you can hear them, where you can see
 10 them and make sure there's no back-room deals going on.
 11 It's now time for me to ask for testimony
 12 from the public and again limited to the land use
 13 consistency issues. Are there members of the public that
 14 wish to testify, and, if so, if you will form a line in
 15 the aisle here and come up, it will be first come, first
 16 serve. If we don't have folks coming up shortly, then it
 17 will be a short land use consistency meeting, and we can
 18 start talking about the scope of the environmental impact
 19 statement.
 20 Sir, if you will come up and state your name
 21 and address, please.
 22 COMMENTS BY ALLAN WISE
 23 Yes, my name is Allan Wise, Post Office Box
 24 393 in Kalama. Me and my wife, Marie Wise, we're citizens
 25 of Kalama, and we would like to speak against the proposed

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1 coal energy plant.
 2 The character of our community is not
 3 reflected in this proposed project. Kalama is a growing
 4 residential town and this quaint community is known for
 5 its antique shops and fabulous Columbia River vistas and
 6 unique geography that brings highway, river, and rail
 7 together.
 8 The visual character of Kalama is romantic
 9 and charming aesthetically. We would like to see it stay
 10 that way. We owe it to our local rivers to make
 11 environmentally sound decisions for our Kalama area. It's
 12 no secret here in Cowlitz County that we do have a history
 13 of large blue-collar industries. This historical
 14 connection is now being used by Energy Northeast in their
 15 decision to be here. Not many residents here will cry
 16 NIMBY.
 17 Like any other area we'd like to see an
 18 influx of family-wage jobs. Cowlitz County's environment
 19 has been negatively impacted by this heavy industry we
 20 have. We'd like to see more light industrial, retail,
 21 commercial, and river-based growth in Kalama's future.
 22 The Port of Kalama is well poised for this type of future
 23 growth. I know they look for it and they've had it and
 24 they do a good job.
 25 We question this decision however and

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1 whether the Port of Kalama is adhering to its mission
 2 statement. We don't view their decision to lease land to
 3 a coal energy plant to be in the community's best interest
 4 or to be in an environmentally responsible manner. The
 5 greenhouse gas issue is huge on the near political
 6 horizon, but we would like to address another issue and
 7 that being visual environment. This proposed plant would
 8 have a negative impact on the views from Kalama's
 9 hillsides. Tall smokestacks and the water vapor clouds
 10 create an unattractive vista for those who travel south on
 11 Interstate Highway 5.
 12 The Trojan Nuclear Plant across the Columbia
 13 River probably stymied Kalama's growth in the past. We
 14 don't want more of the same, and we are pleased that it no
 15 longer haunts our landscape. Those who boat and recreate
 16 on the Columbia would be exposed to an eyesore. Energy
 17 Northwest will speak about their Tampa, Florida facility,
 18 but they won't tell you that's on an isolated property of
 19 over 4,000 acres; that Kalama's plant would be about twice
 20 the size of the Tampa facility on just 95 acres and very
 21 visible to the people in our community.
 22 A year ago we expressed our view issues to
 23 the City of Kalama at a public meeting. The city's
 24 comprehensive plan at 2025 addresses our concerns under
 25 their general environmental goals. Their Goal No. 3 to

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1 encourage the location of safe and environmentally
 2 responsible industries in the Port of Kalama industrial
 3 area. We don't think it's met that.
 4 Number two, the comprehensive plan asked to
 5 preserve the natural and scenic amenities that define
 6 Kalama and provide a distinct and unique quality of life.
 7 We don't think it does that either.
 8 Their Goal No. 1, Environmental Goal No. 1,
 9 to encourage a pattern of community development in concert
 10 with lands capacity to support such development, to avoid
 11 hazard areas, and preserve the unique natural scenic
 12 areas.
 13 It's a scenic area where it's at now and it
 14 would have great impact. We strongly urge the energy
 15 Council to dissuade Energy Northwest from siting here.
 16 Thank you very much.
 17 JUDGE TOREM: Thank you, Mr. Wise.
 18 I'll ask folks again to please refrain from
 19 any showing if you approve or disapprove of what the
 20 speaker is saying because it could easily--we'll leave the
 21 partisanship for tomorrow I hope and get your chance at
 22 the ballot box.
 23 Sir, if you will state your name.
 24 COMMENTS BY PHILLIP MASSEY
 25 Phillip Massey. Don't worry. I'm not going

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1 to say anything that they'll clap for so.
 2 JUDGE TOREM: What's your last name, sir?
 3 MR. MASSEY: Phillip Massey, M-a-s-s-e-y,
 4 1194 China Garden Road, citizen of Kalama, and I'm also a
 5 river pilot and I pilot ships on the Columbia River. My
 6 concern is that--and I've been on record as being in
 7 support of this project right from the start, and I'm
 8 still an avid supporter of the Port Kalama. But one thing
 9 that concerns me is that in land use consistency is that
 10 the project seems to be changing shape. Early on there
 11 was talk of a lot of cargo arriving by ship, and, you
 12 know, the traditional use of port property, and now it
 13 sounds like all or most of the feed stock will be coming
 14 from Canada or by rail.
 15 If that is indeed the case, if there's
 16 little or no feed stock to arrive across the dock, then
 17 this isn't a proper use of this prime piece of waterfront
 18 property. As you may know, port property, good deep water
 19 port property up and down the coast is a premium, and this
 20 happens to be probably the most prime piece of property
 21 left on the Columbia River. And I think that if there's
 22 little or no cargo feed stock cargo arriving by ship, the
 23 project could be built elsewhere, you know, and I think
 24 there's lots of other opportunities, you know, for this
 25 port property.

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1 I like the idea of sequestration. I think
 2 that these people have been responsible in their approach
 3 in trying to build a facility here, but this may not be
 4 the place for the facility if they're not talking about
 5 significant amounts of cargo coming across the dock the
 6 way that the port of Kalama has done as well as it's done,
 7 and it's done a magnificent job for this community. The
 8 only parks that we have in this community are part of the
 9 Port of Kalama. You know, they've made this a very, very
 10 livable place, but they've done it with the revenue
 11 primarily of ships tied along side a dock and tonnage
 12 going back and forth across the dock, and I think that
 13 that's what we really have to focus on in the years to
 14 come. Thank you.
 15 JUDGE TOREM: Thank you, Mr. Massey.
 16 Sir?
 17 COMMENTS BY BRETT VANDENHEUVEL
 18 Good evening. My name is Brett
 19 Vandenheuvel. I represent Columbia River Keeper.
 20 JUDGE TOREM: Can you spell your last name.
 21 MR. VANDENHEUVEL: It's
 22 V-a-n-d-e-n-h-e-u-v-e-l.
 23 JUDGE TOREM: Thank you.
 24 MR. VANDENHEUVEL: You're welcome, and I
 25 represent Columbia River Keeper which is based out of

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1 White Salmon, Washington and Hood River, Oregon. The
 2 commission raised some good questions about the
 3 consistency letters and I'm going to try to speak to
 4 briefly and expand on those. There's some ambiguity in
 5 the consistency letters, and, frankly, even after that's
 6 cleared up, it's unclear to me how the commission is going
 7 to decide whether this proposed coal plant is consistent
 8 with local land use laws based on the two or three
 9 sentences that the county provided and a little more
 10 information from the city.
 11 There's no findings in those consistency
 12 letters. The commission doesn't know what they're based
 13 upon. I think we need a more detailed analysis by the
 14 county and the city of their comp. plan and their code in
 15 order for the commission to determine whether that's a
 16 viable determination on their part.
 17 For one example the county says that the
 18 proposed use of the coal plant is consistent with heavy
 19 industry, that designation, but it ignores all other
 20 criteria in their code. There's a lot more in the code
 21 than simply heavy industry designation. For example,
 22 there's a critical areas ordinance which I will briefly
 23 touch on in a minute. In the city's letter it says that
 24 the pipeline under that zoning is for manufacturing,
 25 warehousing, and distribution, and the city says it's

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1 similar in operations, but it doesn't explain what that
2 means.

3 Looking at the plain meaning of the terms
4 manufacturing, warehousing, and distribution, it seems a
5 stretch to call this similar, and there's no explanation
6 of that at all. So those are just some sort of technical
7 points.

8 I think the more outstanding question is
9 that both in the county and the city this area along the
10 river has been designated as critical area under the
11 critical areas ordinance for wetlands, for aquifer
12 recharge, for fish and wildlife conservation, and from the
13 city it's designated for a flooding frequency critical
14 area.

15 So as you all know these are important
16 things. Aquifer recharge where the ground water system
17 that we all depend on is being recharged, fish and
18 wildlife conservation, the Applicant does not discuss
19 these things in any detail, and it's not clear from the
20 Cowlitz County letter how it's consistent with these
21 critical area ordinances. I think that's something that
22 the commission needs to look at in detail and get some
23 information from the county. Perhaps the commission or
24 the county is going to say, "We'll look at that later,"
25 and that's not appropriate. We don't want to do this as a

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1 piece-meal review.

2 It would be appropriate for the Applicant to
3 put everything on the table and the city and the county to
4 put everything on the table and do all the analysis at the
5 beginning instead of having to come back and do it all if
6 it's done improperly again. Nobody wants to attend these
7 over and over instead of just putting on information out
8 there and doing the proper analysis at the beginning.

9 Wetlands: The Applicant mentioned 3.2 acres
10 of wetland fill that will be necessary for the railroad
11 spur. They seem to say it was degraded. In their
12 application it says it has high functions for habitat,
13 water quality, and flood and erosion control. The site is
14 being, the proposed side is a filled Columbia River flood
15 plain and wetland. It has 16 feet of fill. So we've lost
16 a lot of wetland along the flood plain and anything in
17 that area that is now retaining flood control is crucial
18 not only for Ecology but for flood control.

19 So 3.2 acres shouldn't be scoffed at. It's
20 important. It's actually a vast underestimation of the
21 impact because they also said they would be rerouting
22 existing culverts that would drain wetlands and impact 5.6
23 acres. So that's an additional 5.6 acres, and they failed
24 to discuss at all the northern wetland which is a back
25 channel of the Columbia River. And it says in the

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1 application that this will be addressed under a separate
2 application filed by the port, the Army Corps of
3 Engineers. So apparently I haven't looked into it enough,
4 but apparently the port may be applying for some sort of
5 fill permit for this exact site. So it's certainly a
6 connected action. Whether who's applying for it, whether
7 it's the Applicant or the port itself, it needs to be
8 analyzed under this determination.

9 Briefly the aquifer recharge areas in
10 Cowlitz County 19.15.160 it says: Building on these shall
11 be prohibited unless hydrogeologic testing and site
12 satisfactory demonstrates the adverse impacts will be
13 mitigated. I haven't seen where that's been done yet. In
14 order to be consistent with that part of the code that
15 needs to be complied with. So there's more just then the
16 zoning or the land use designation. These critical areas
17 ordinance is also a part of the local land use law that
18 needs to be complied with. Fish and wildlife habitat
19 conservation under Cowlitz County Code 19.15.130, the
20 county must assess which classification a site falls under
21 and protect it according to those standards which are laid
22 out in a couple pages of detail. Again, that's not
23 addressed in the consistency letter.

24 Flood management permit: They need a flood
25 management permit. There's no indication of whether

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1 that's going to be issued, whether that's feasible under
2 the Kalama Comprehensive Flood Management Plan which was
3 passed in 1999. I'm sure some of you know the details of
4 that and why that was passed. The Applicant says that it
5 is not legally binding, and so they're trying to--there
6 must be something in that plan they don't like so they
7 said it's not legally binding instead of saying they're
8 going to comply with. It's a valid city plan. It was
9 passed by legislative process in the city. They have to
10 comply with it. If they want to challenge the legality of
11 the plan, they should have done that when it passed. If
12 they want to make some kind of constitutional argument
13 against it, then they have that right to do that, but they
14 can't say that it doesn't apply because it's certainly a
15 valid city plan.

16 There's a whole host of other portions of
17 the comp. plan they didn't address, including open space
18 shorelands; historical, cultural, recreation shoreline
19 uses. The consistency letter didn't address those. I
20 think either EFSEC or the city or the county, somebody
21 needs to address these prior to saying that it's
22 consistent with land use, with the land use laws for the
23 city and county. Thank you.

24 JUDGE TOREM: Thank you. Mr. Vandenheuvel,
25 do you have a written copy of what you've read off there

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1 because of some of the citations? Of course, they will be
2 in the record, but it would be easier if we could have a
3 written copy of that. If you have one and you could leave
4 it with us tonight, we would appreciate it.
5 MR. VANDENHEUVEL: Sure. I do. I'll leave
6 one. Just one more thing. I understand that written
7 comments are open on the land use designation until
8 November 20.
9 JUDGE TOREM: That's correct. And we may
10 reopen that if it proves necessary. From the points that
11 you made tonight and some other's questioning of what the
12 letters mean and our own questions, I think perhaps we
13 will be looking for a more detailed certificate from the
14 city. Typically if you look at our EFSEC regulations we
15 require land use consistency, and the experts for that
16 typically are the municipal organizations that enforce
17 those plans. EFSEC in Olympia have no business enforcing
18 land use beyond the growth management act as it stands on
19 what you do down here in Kalama or in Cowlitz County;
20 however, I don't think they want to take something that
21 doesn't stand on its face. If there's some worries about
22 the thoroughness of these letters, I think the Chair and
23 myself have already expressed some concerns as to exactly
24 what they mean and have similar, if not as detailed,
25 inquiries tonight as to what the other folks have raised

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1 already. So we will be looking for more and I don't think
2 you'll find there is sufficient for this Council tonight,
3 and, again, there won't be a decision until at least next
4 month as to land use consistency.
5 If there is a determination that land use is
6 not consistent based on some of the concerns raised
7 tonight or other concerns that come up, it doesn't mean
8 the project stops. It just means that they have to
9 negotiate with the county and/or the city to get those
10 certifications or have a much more I'll call it
11 adversarial cross-examination type process where we'll
12 find out how the Applicant says, "Yes, we disagree with
13 this county or the city. We think we are consistent," and
14 there's another process called preemption if they think
15 they can't be consistent, but the state should override
16 those rules. That's much down the road. I don't think
17 it's contemplated in this case, but I just want folks
18 listening to the expressions tonight to know we're hearing
19 them and this fits into a very well established framework
20 as to how EFSEC works and considers local concerns and
21 local land use plans. So if you will leave a copy with us
22 sometime tonight or just send one in by the 20th, we'd
23 appreciate it.
24 MR. VANDENHEUVEL: Okay.
25 JUDGE TOREM: Are there others from the

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1 public that wish to comment tonight? I see one and two at
2 least. So I'll take the lady in the front and then the
3 gentleman in the back. Go ahead and pull that microphone
4 down, ma'am.
5 MS. SCARDIGLI: Okay.
6 JUDGE TOREM: Your name, please.
7 MS. SCARDIGLI: My name is Barbara
8 Scardigli. I'll spell that last name, Scardigli,
9 S-c-a-r-d-i-g-l-i.
10 JUDGE TOREM: Thank you, ma'am.
11 COMMENTS BY BARBARA SCARDIGLI
12 I live in Battleground, Washington, and I
13 don't have anything written or prepared to say, but I am
14 against the building of this coal refinery here in Kalama
15 along the Columbia River. Has a refinery like this been
16 built anywhere else before? What kind of pollution
17 standards were set and met or were they not met? What
18 kind of pollution standards were not met?
19 JUDGE TOREM: Ms. Scardigli, let me just
20 clarify quickly. The pollution standard issues are going
21 to be taken up under the SEPA or the environmental impact
22 statement scoping so I'll take your comments in regard to
23 that. You won't have to repeat them again. If you have
24 comments directly as to the land use and how that's the
25 three prior gentlemen had said how it would affect the use

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1 of the port property or the view scape or something along
2 those, this is the time for those comments. So if you
3 have anything in your opposition to the project as to the
4 use of the land or local regulations, how they might not
5 be consistent, if you could focus on those we would
6 appreciate that. It's a mouthful I know, but if you could
7 focus on land use issues as opposed to the general other
8 environmental impacts.
9 MS. SCARDIGLI: All right. The Columbia
10 River Gorge is a national scenic area, and I agree with
11 the first gentleman's statements regarding the fact that a
12 coal mining plant along the river is going to be very
13 detrimental to the beauty of the Columbia Gorge scenic
14 area, and the land use eliminating and deterring the wild
15 waterfall, the ecological land use.
16 My thoughts have left me so I guess I'll ask
17 one thing. I wanted to know is if the coal is going to be
18 shipped from Montana and/or Wyoming why isn't the power
19 plant going to be put over there instead of shipped all
20 the way over here to the northwest corner of Washington
21 State and along our Columbia Gorge River?
22 JUDGE TOREM: Thank you, ma'am.
23 MS. SCARDIGLI: Thank you.
24 COMMENTS BY DARREL WHIPPLE
25 Hi, I'm Darrel Whipple representing Willapa

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1 Hills Audubon Society, a group of 250 approximately
2 members in Cowlitz County, Wakiakum County, Pacific
3 County, and Columbia County, Oregon. I'm from Rainier,
4 Oregon.
5 We have a point to make regarding the
6 regional land use which may or may not be what the City of
7 Kalama is concerned with or even the state council that
8 you people constitute. But we have one Columbia River
9 shared by several states, and so I would ask you to find a
10 way to make land use considerations that include at least
11 all the lower Columbia River. And one of those
12 considerations should be what capacity should the lower
13 Columbia have for a number of such plants as this one
14 that's proposed. The natural gas proposed plant in
15 Clatskanie that was proposed in 2003, I think Summit
16 Westward Power Group has been terminated but is being
17 replaced by the same company as a coal gasification plant.
18 So we have a matter of two competing plants in the same
19 air shed basically and the same water shed, and I think
20 this constitutes a land use matter at least in some
21 regard. So that's the point I would like to make to you
22 tonight in regards to the land use considerations.
23 JUDGE TOREM: Thank you, sir.
24 Any other members of the public that wish to
25 make their comment to us tonight on the record?

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1 Seeing none, let me just again remind folks
2 that the address for comments is on the form that
3 Mr. Fiksdal had made available. The Council is going to
4 again review much more I believe from the city and the
5 county based on what I've seen tonight that's been
6 presented thus far from the Applicant, and when their land
7 use hearing is reconvened, there may be a need for
8 additional testimony at that time. We'll see what comes
9 in between now and November 20.
10 There's also a separate procedure later on
11 for folks that want to be formally involved in the
12 adjudication which will be scheduled months down the road
13 to actually hammer out with expert witnesses the location
14 and environmental impacts we're going to shift to in a
15 moment to look into the draft environmental impact
16 statement's scope. So as you decide if you want to be one
17 of those people, see Mr. Fiksdal tonight if you have any
18 indications that you want or a group that you participate
19 in to be an intervenor in this and formally be calling
20 witnesses and presenting testimony. But as we go along, I
21 believe as Mr. Vandenheuvel said we don't want to have
22 many piecemeal arguments, but the land use issue was one
23 distinct piece of this EFSEC process. We're starting that
24 piece tonight and hopefully we'll finish that well in
25 advance of the adjudication. If it's not resolved, then

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1 the issue of preemption would be added to the adjudication
2 itself sometime next summer. This is one of many times
3 you'll have a chance to submit your comments, but again if
4 you'll focus this group of comments that are being in
5 writing to us by November 20 on land use issues, we
6 certainly appreciate that.
7 Again, the continuation of this hearing will
8 be at a time and place to be noticed after receipt of
9 written comments. It's highly probable that it will be
10 back here in the local area, but it may occur as something
11 on a telephone call-in as part of a regular EFSEC meeting.
12 So if you want to know about that make sure you're on the
13 list to get the information sent to you, and, again, we do
14 make every effort to hold all substantive meetings here in
15 the local area so that we can maximum participation. If
16 you want to be on the mailing list just so you know when
17 it is, make sure you see Mr. Fiksdal or other EFSEC staff
18 tonight.
19 Councilmembers, anything for the land use
20 portion of the hearing?
21 CHAIR LUCE: Just one thing. I would notice
22 there was reference made to intervention in the
23 adjudication. This is Jim Luce, Council Chair.
24 Intervention in the adjudication carries significant
25 responsibilities, roles and responsibilities to

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1 participate in that manner in the legal proceeding or it's
2 been described a trial-like proceeding. Members of the
3 public can also offer public testimony in the public
4 comment sessions we will have. Those will be considered
5 by the Council and given the same weight as the
6 adjudicatory proceeding so I don't want you to feel or
7 leave here thinking that you have to intervene in this
8 adjudicatory proceeding to have your views heard. That is
9 not necessary, but it is possible if you wish to assume
10 that degree of responsibility. Mr. Fiksdal can further
11 inform you regarding that.
12 JUDGE TOREM: Thank you for that
13 clarification, Chairman Luce.
14 One other item I want to point out on that
15 note is that you met Mr. Tribble, the Assistant Attorney
16 General who's got that fantastic title of Counsel for the
17 Environment. He is for general environmental concerns the
18 way to go and represents the people of this state, and if
19 you have items for him and you didn't get his contact
20 information, you can get that tonight, and he may be able
21 to take up a wider variety of concerns that you may not
22 have the time or energy to act as an intervenor on behalf
23 of and bring those and make sure they're adequately aired
24 before the Council and get full consideration.
25 All right. It is now 8:14 by my watch.

1 We'll formally end the land use portion of this hearing.
2 We'll take a ten minute break and then come back and get
3 people's input on the scope of the environmental impact
4 statement. Thank you.

5 * * * * *

6 (Whereupon, the land use hearing was
7 adjourned at 8:14 p.m.)
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A F F I D A V I T

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7 I, Shaun Linse, CCR, Certified Court Reporter,
8 do hereby certify that the foregoing transcript
9 prepared under my direction is a true and accurate
10 record of the proceedings taken on November 6, 2006,
11 in Kalama, Washington.
12
13
14

15 _____
16 Shaun Linse, CCR
17 CCR NO. 2029
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I N D E X

PUBLIC COMMENTS	PAGE
Katy Chaney	7
Allan Wise	11
Phillip Massey	14
Brett Vandenheuvel	16
Barbara Scardigli	24
Darrel Whipple	25

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List of Individuals or Organizations Commenting and List of Comments

Comments

Commentor	Organization	Address
1 Peterson, Mike	The Lands Council	mpetersen@landscouncil.org
2 Wilhelmsen, Larry	Citizen	lwilhelmsen1@yahoo.com
3 Mossey, Phillip	Citizen	1194 Chinn Garden Rd Kalama, WA 98625 115 Horizon Drive PO Box 393
4 Wise, Marie	Citizen	Kalama, WA 98625 115 Horizon Drive PO Box 393
5 Wise, Alan	Citizen	Kalama, WA 98625
6 Purvis, Cheryl	Citizen	cherylpurvis@msn.com
7 VandenHeuvel, Brett	Columbia Riverkeeper	brett@ecoisp.com 219 1st Avenue South #100
8 Dixon, Dannielle	NW Energy Coalition	Seattle, WA 98104 219 1st Avenue South #100
9 Krasnowsky, Marc	NW Energy Coalition	Seattle, WA 98104 400 W. 8th St. #426
10 Wilhelmsen, Larry	Citizen	Vancouver, WA 98660 alison@firehousemail.com 400 W. 8th St. #426
11 Dohman, Alison Govedare, Joan	Citizen	Vancouver, WA 98660 alison@firehousemail.com
12 Jordan, Pete	Citizen	2160 E. Woodbine Langley, WA 98260
13 Russell, Teresa	Citizen	19031 18th Ave. NE Shoreline, WA 98155 12706 NE 7th Avenue
14 Casswell, Majorie	Citizen	Vancouver, WA 98685 macasswell@aol.com

Comments

Commentor Organization

Address

15 Steinke, Don	Citizen	4833 NE 238 Ave Vancouver, WA 98682
16 Clay-Poole, Teri	Citizen	2617 Galloway St SE Olympia, WA 98501 calypso1228@hotmail.com
17 Berman Phelps, Rebecca	Citizen	1359 E. Boston St Seattle, WA 98102 rebeccaphelps@comcast.net
18 Rimbos, Peter Barrett, Guy	Citizen	19711 241st Ave SE Maple Valley, WA 98038 primbows@comcast.net PO Box 47775
19 Van Zwalenburg, Kim	Ecology, Dept of	Olympia, WA 98504 245 E. Squire Rd.
20 Horeth, Heidi	Citizen	Coupeville, WA 98230
21 Cole, Roger	Citizen	5505 E. Evergreen Blvd Vancouver, WA 98661
22 DeWreede, Elizabeth	Citizen	13136 201st Ave SW Rochester, WA 98570
23 Holder, Lehman	Citizen	8916 NE 11th St Vancouver, WA 98664
24 Ball, Eldon	Citizen	3022 NE 140th St. #121 Seattle, WA 98125 PO Box 306
25 Hays, Lynn 26 Duplicate of 18	Citizen	Langley, WA 98260
27 Metcalf, Matt	Citizen	2110 Amhurst St. SE Olympia, WA 98501 PO Box 47775
28 Cline, Matt	Ecology, Dept of	Olympia, WA 98504
29 Silber, Andy	Citizen	6552 37th Ave SW Seattle, WA 98126
30 Leonard, Kirk	Citizen	217 Pebble LN Kalama, WA 98625
31 Leonard, Linda	Citizen	217 Pebble LN Kalama, WA 98625

Commentor	Organization	Address	Comments
32 VandenHeuvel, Brett	Columbia Riverkeeper	Old Gus Solomon Courthouse 620 SW Main Street, #615 Portland, OR 97205	Letter sent on behalf of: Brent Foster, Executive Director Columbia Riverkeeper Mark Riskedahl, Ex. Dir. Northwest Environmental Defense Center
33 VandenHeuvel, Brett	Columbia Riverkeeper	724 Oak Street Hood River, OR 97031 Regional Office, Region 6 PO Box 3623	Letter sent on behalf of: Brent Foster, Executive Director Columbia Riverkeeper Mark Riskedahl, Ex. Dir. Northwest Environmental Defense Center
34 Graw, Richard	U.S. Forest Service League of Women Voters	Portland, OR 98208	Original sent to Dept. of Ecology
35 Toni Potter		antoniapotter@comcast.net 874 NE Killingsworth St Portland, OR 97211	
36 Daniel Serres	Energy Options Sierra Club	dserres@gmail.com	
37 Aaron Robins	Cascade Chapter	asrobins@cablespeed.com 1172 Confer Rd. Kalama, WA 98625	
38 Dick Kennedy	Citizen Dept. of Fish and Wildlife	600 Capital Way North Olympia, WA 98501	
39 Charlene Andrade			

List of Comments by Issue

A	B	C	D	E	F	
1	The list below is a compilation of the comments received during the scoping period for the Pacific Mountain Energy Center EIS. Each letter, email, or fax received was reviewed to identify individual comments. The comments were numbered corresponding to the letter, email, or fax received. In addition, each comment was coded identifying the issue to be addressed. Ecology & Environment, Inc., then made a recommendation on whether the comment/issue was significant and should be addressed in detail in the EIS or whether the comment/issue could be addressed by including more information in the EIS than was included in the Application for Site Certification. The code for identifying the issue is provided below.					
2	Code	EIS Issue				
3	PN	Purpose and Need				
4	LA	Location Alternative				
5	TA	Technology Alternative				
6	FA	Fuels Alternative				
7	E	Earth				
8	A	Air				
9	W	Water				
10	Hab	Habitat and Wildlife				
11	H	Environmental Health				
12	L	Land Use				
13	T	Transprotation				
14	U	Public Services and Utilities				
15	S	Socioeconomics				
16						
17	PMEC Comments from Public Scoping Letters Organized by Issue					
18	Comment Number	Comment Concern	EIS Issue	Location in Application	Impact Analysis	Comment Addressed
19	1-5	Quantity of CO2 to be released daily	A	2.114	Y	Air quality section of EIS
20	2-1	Global warming	A	2.11.4	Y	Air quality section of EIS
21	3-6	Will nitrogen and CO's be generated by the air separation unit	A	2.3.6.4	N	Information to include in EIS
22	4-2	Green house gas emissions	A	2.11.4	Y	Air quality section of EIS
23	5-2	Green house gas emissions	A	2.11.4	Y	Air quality section of EIS
24	8-5	Expected output of air pollutants and mitigation measures	A	3.2; 5.1	Y	Air quality section of EIS
25	8-6	Relative emissions impacts	A	2.11; 5.1	Y	Air quality section of EIS
26	8-10	Address proposed rules to limit mercury emissions	A	Not addressed	N	Addressed by EFSEC
27	8-12	Green house gas emissions	A	2.11.4	Y	Air quality section of EIS
28	8-14	CO2 emissions reduction	A	2.11.5	Y	Air quality section of EIS
29	9-3	Global warming	A	2.11.4	Y	Air quality section of EIS
30	9-5	Green house gas emissions	A	2.11.4	Y	Air quality section of EIS
31	10-2	Global warming	A	2.11.4	Y	Air quality section of EIS
32	10-3	Sulfur emissions	A	2.11; 5.1	Y	Air quality section of EIS
33	10-4	Increase sulfur emissions	A	2.3.9	Y	Air quality section of EIS
34	11-1	Toxic pollutants air emissions	A	2.11; 5.1	Y	Air quality section of EIS
35	11-2	Global warming	A	2.11.4	Y	Air quality section of EIS
36	12-1	Pollutants to Washington's Air	A	2.11; 3.2	Y	Air quality section of EIS
37	12-2	Global warming	A	2.11.4	Y	Air quality section of EIS
38	13-2	Global warming	A	2.11.4	Y	Air quality section of EIS
39	14-1	Pollutants to Washington's Air	A	2.11; 3.2	Y	Air quality section of EIS
40	14-2	Global warming	A	2.11.4	Y	Air quality section of EIS

List of Comments by Issue

	A	B	C	D	E	F
	Comment Number	Comment Concern	EIS Issue	Location in Application	Impact Analysis	Comment Addressed
18						
41	15-9	Global warming impacts far into the future	A	2.11.4	Y	Air quality section of EIS
42	16-2	Global warming	A	2.11.4	Y	Air quality section of EIS
43	17-3	Global warming	A	2.11.4	Y	Air quality section of EIS
44	18-1	Global warming	A	2.11.4	Y	Air quality section of EIS
45	18-4	Toxins in the Air	A	2.11; 3.2	Y	Air quality section of EIS
46	21-2	Global warming	A	2.11.4	Y	Air quality section of EIS
47	22-1	Global warming	A	2.11.4	Y	Air quality section of EIS
48	23-2	Global warming	A	2.11.4	Y	Air quality section of EIS
49	24-1	Release of toxins and mercury to air	A	5.1	Y	Air quality section of EIS
50	24-2	Global warming - quantity of CO2 released	A	2.11.5	Y	Air quality section of EIS
51	25-1	Discharge of pollutants to air	A	2.11.4	Y	Air quality section of EIS
52	27-1	Air pollution from coal power plant	A	2.11	Y	Air quality section of EIS
53	29-1	Green house gas emissions	A	2.11.4	Y	Air quality section of EIS
54	30-1	Global warming	A	2.11.4	Y	Air quality section of EIS
55	31-1	Global warming	A	2.11.4	Y	Air quality section of EIS
56	32-1	Thoroughly examine impacts of SO2 and NOX	A	5.1	Y	Air quality section of EIS
57	32-2	Quantify TPY of criteria pollutants	A	5.1	Y	Air quality section of EIS
58	32-3	Impact on attainment with CAA, PSD, and Class 1 Areas	A	5.1	Y	Air quality section of EIS
59	32-4	Air quality and visibility impacts on the Columbia River Gorge	A	5.1	Y	Air quality section of EIS
60	32-8	Quantify health impacts from plant air emissions	A	5.1	Y	Air quality section of EIS
61	32-9	Evaluate impact of ozone on crops and forests	A	5.1	N	
62	32-10	Quantify extent pollutants will limit visibility	A	5.1	Y	Air quality section of EIS
63	32-11	Analyze environmental, health, and economic impacts from mercury emissions	A	5.1	Y	Only related to environmental and health
64	32-12	Model the impact of mercury emissions on local deposition and accumulation	A	5.1	Y	Air quality section of EIS
65	32-13	Analyze cumulative impacts of mercury emissions	A	5.1	Y	Air quality section of EIS
66	32-14	Quantify CO2 emissions, percentage of Washington State CO2 emissions	A	2.11.5	Y	Air quality section of EIS
67	32-15	Contribution to overall global warming	A	2.11.4	Y	Air quality section of EIS
68	34-1	The Class I impact analysis should consider "worst case" scenarios	A	5.1	Y	Air quality section of EIS
69	34-2	The proposed emission control technology is not proven	A	2.11.4	Y	Air quality section of EIS
70	35-1	Greenhouse gas emissions under all potential fuel-mix scenarios	A	2.11.4; 2.19.5	Y	Air quality section of EIS
71	35-2	Greenhouse gas emissions from transportation of the fuel to the site	A	2.11.4	Y	Air quality section of EIS
72	36-12	HAP analysis for all operating conditions	A	5.1	Y	Air quality section of EIS
73	37-1	Existing air quality and potential pollution levels from construction and operation	A	5.1	Y	Air quality section of EIS
74	9-4	Evaluate Impacts from using pet coke or coal	A	5.1	Y	Air also waste, and transportation
75	8-9	How air emissions would differ using other alternatives	A	2.11.4	Y	Air quality section of EIS
76	8-11	Estimate annual amounts of natural gas and diesel used at facility	A	3.6	N	Information to include in EIS
77	15-1	Emissions from all fuel scenarios	A	2.11.4; 2.19.5	Y	Air quality section of EIS
78	36-6	Evaluate different fuel mixes on type and quantities of air emissions.	A	5.1	Y	Air quality section of EIS
79	15-4	Unhealthy emissions and neighborhoods	A	2.11	N	Information to include in EIS
80	37-6	Impact on Oregon non-attainment regions	A	5.1	Y	Air quality section of EIS
81	37-8	Impacts from greenhouse gas on precipitation and plants and animals.	A	Not addressed	N	Outside scope of EIS
82	8-2	General cumulative Impacts	C	Not addressed	N	Information to include in EIS
83	9-2	General cumulative Impacts	C	Not addressed	N	Information to include in EIS
84	15-13	Cumulative Impacts far into the future	C	Not addressed	N	Reasonable future actions
85	32-5	Additive and synergistic impacts of all regional sources including cars and trucks	C	Not addressed	?	EFSEC/Ecology to address

List of Comments by Issue

	A	B	C	D	E	F
	Comment Number	Comment Concern	EIS Issue	Location in Application	Impact Analysis	Comment Addressed
18						
86	32-6	Cumulative impacts of all existing regional air emissions	C	Not addressed	Y	Air quality section of EIS
87	32-7	Cumulative air impacts from increasing industrialization	C	Not addressed	Y	Cumulative impacts, including reasonable future actions will be addressed
88	36-2	Cumulative air impacts on the Columbia River Gorge and lower Columbia River basin.	C	Not addressed	Y	Air quality section of EIS
89	36-7	Cumulative water quality and wildlife impacts in the lower Columbia River basin.	C	Not addressed	Y	Habitat/wildlife section of EIS
90	36-8	Air emission cumulative impacts should consider future transportation emissions	C	Not addressed	N	Outside scope of EIS
91	36-10	Air quality impacts to Class I areas and Columbia Gorge, including cumulative impacts	C	3.2.1	Y	Air quality section of EIS
92	36-14	Water quality cumulative impacts	C	3.3.1	?	Need more information
93	32-61	Analyze impact of geohazards to the site	E	2.15	Y	Geology section of EIS
94	32-62	Consider geohazard impacts on transmission line and pipeline	E	2.15	Y	Geology section of EIS
95	32-63	Consider affects of mass wasting impacts on the project	E	2.15	N	Mass wasting not likely to occur at the site
96	1-1	Source of coal	FA	2.3.14	N	Information to include in EIS
97	1-2	Quantity of coal used per day	FA	3.6	N	Information to include in EIS
98	1-3	Will syngas be sent off site	FA	2.3.6.3	N	Information to include in EIS
99	1-4	What are constituents of syngas	FA	2.3.6.3	N	Information to include in EIS
100	1-6	Where will activated carbon residue go	FA	2.3.6.5	Y	Information to include in EIS
101	1-7	Does activated carbon contain toxics	FA	Not addressed	?	Information on potential for hazardous releases inadequate
102	3-2	Why Pet Coke, and not low sulfur coal	FA	2.3.14; 2.19.5	Y	Alternative section
103	3-3	Demand for coal or/and pet coke from ships	FA	2.3.14	N	Information to include in EIS
104	36-17	Where and how coal for the facility will be extracted.	FA	Not addressed	N	Outside scope of EIS
105	36-18	If coal comes from Powder River Basin address environmental impacts of mining	FA	Not addressed	N	Outside scope of EIS
106	37-7	Impacts from coal mining, transport and natural gas and petcoke production.	FA	Not addressed	N	Outside scope of EIS, except localized transportation impacts
107	19-1	Potential for hazardous release	H	4.1.3	?	Information on potential for hazardous releases inadequate
108	3-5	Will the air separation unit effect the environment	H	2.3.5; 2.3.6.4	N	Information to include in EIS
109	13-3	Mercury into the soil	H	4.1.3	?	Information on potential for hazardous releases inadequate
110	16-4	Environment and Public Health	H	4.1.3	?	Comment noted
111	18-2	Harm to health of surrounding neighborhoods	H	4.1.3	?	Information on potential for hazardous releases inadequate
112	32-22	Focus on potential impacts to ESA species	HW		Y	Habitat/wildlife section of EIS
113	32-25	Consider additive, synergistic and bioaccumulation of each pollutant in the wastewater discharge	HW	Not addressed	N	Water quality criteria take these into account
114	32-26	Consider economic and health effect of water quality degradation on populations that depend on healthy salmon	HW	Not addressed	N	Not considered a key EIS issue
115	32-35	Analyze impact of consumptive use on salmonids and other aquatic species	HW	Not addressed	N	Part of water right analysis
116	32-36	Potential impacts on wetlands from water withdrawal	HW	Not addressed	N	Part of water right analysis
117	32-41	Analyze how withdrawal will affect fish and wildlife	HW	Not addressed	N	Part of water right analysis
118	32-42	How will ranney well construction affect the floodplain and aquatic habitat?	HW	Not addressed	?	Not enough information
119	32-43	Analyze impacts from wetland fill	HW	3.5	Y	Habitat/wildlife section of EIS
120	32-44	Consider impacts of the fill of the wetlandl on north side of project	HW	3.5	Y	Habitat/wildlife section of EIS
121	32-45	Consider wetland fill impacts on ESA species	HW	3.5	Y	Habitat/wildlife section of EIS

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	A	B	C	D	E	F
	Comment Number	Comment Concern	EIS Issue	Location in Application	Impact Analysis	Comment Addressed
18						
122	32-46	Consider alternative designs to avoid wetland impacts	HW	3.5	Y	Strongly recommended by WDOE, Ltr #28
123	32-47	Filling of the backchannel is a connected action to PMEC.	HW	3.5	Y	Habitat/wildlife section of EIS
124	32-50	EIS consider impacts of entire project to wildlife	HW	3.4	Y	Yes in general way the EIS should cover this
125	33-8	Not accounting for all wetland impacts, does not include draining of wetlands.	HW	3.5	Y	Habitat/wildlife section of EIS
126	33-9	The backchannel fill by the Port should be considered as part of the project	HW	3.5	Y	Habitat/wildlife section of EIS
127	33-10	The wetland fill does not comply with the critical areas ordinance	HW	3.5	N	Addressed by EFSEC
128	33-12	The site is a designated critical area for fish and wildlife	HW	Not addressed	Y	Habitat and Wildlife section
129	36-16	Wetland impacts including the natural gas pipeline and Port wetland fills	HW	3.5	Y	Habitat/wildlife section of EIS
130	19-2	Impacts to wetland/shoreline resources	HW	3.4, 4.2	Y	Habitat/wildlife section of EIS
131	39-1	Mitigate for block culverts impacting wetlands	HW	3.5	Y	Habitat/wildlife section of EIS
132	39-2	Prevent the release of mosquito fish off-site	HW	Not addressed	?	Information to be included in EIS
133	39-3	Forested wetland should be protected	HW	3.5	Y	Habitat/wildlife section of EIS
134	28-1	Should consider off-site wetland mitigation	HW, M	3.5	Y	Habitat/wildlife section of EIS
135	28-2	Proposed wetland mitigation not sufficient	HW, M	3.5	Y	Habitat/wildlife section of EIS
136	28-3	Mitigation requires more than fishery enhancement	HW, M	3.5	Y	Habitat/wildlife section of EIS
137	28-4	Proposed mitigation is in an area previously used for wetland mitigation	HW, M	3.5	Y	Addressed by EFSEC
138	28-5	Miscalculated wetland rating - should be #1	HW, M	3.5	Y	Habitat/wildlife section of EIS
139	28-6	Investigate alternative project options to avoid wetland impacts	HW, M	3.5	Y	Habitat/wildlife section of EIS
140	36-13	Impacts on ESA fish species and localized aquatic impacts	HW, W	3.4.2	?	Need more information
141	6-1	Land use consistency	L	4.2.1	N	Addressed by EFSEC
142	7-5	Local government process requires review of entire project at local level before providing land use consistency	L	Not addressed	N	Addressed by EFSEC
143	32-58	Comply with Kalama Comprehensive Flood Management Hazard Plan	L	4.2.1	N	Addressed by EFSEC
144	32-64	Consider if the the proposed action complies with local land use laws and regulations.	L	4.2.1	N	Information to be included in EIS
145	33-1	The project is not consistent with local land use laws and regulations	L	4.2.1	N	Addressed by EFSEC
146	33-2	The pipeline does not fit into the definition of allowable uses as indicated by the City.	L	Not addressed	N	Addressed by EFSEC
147	33-3	Notice of the land use hearing was insufficient no additional information available to the public	L	Not addressed	N	Addressed by EFSEC
148	33-6	A permit is required to construct the facility in a critical area	L	Not addressed	N	Addressed by EFSEC
149	33-7	A decision should on land use consistency should be made on the whole project	L	Not addressed	N	Addressed by EFSEC
150	33-13	Failed to analyze consistency with the Kalama Critical Area Ordinance	L	Not addressed	N	Addressed by EFSEC
151	33-14	The project requires a floodplain permit	L	4.2.1	N	Addressed by EFSEC
152	33-15	The project is inconsistent with shoreline master program	L	4.2.1	N	Addressed by EFSEC
153	33-16	The project has to comply with the Kalama Comprehensive Flood Hazard Management Plan	L	4.2.1	N	Addressed by EFSEC
154	33-17	The project fails to comply with the Cowlitz County Comprehensive Plan	L	Not addressed	N	Addressed by EFSEC
155	7-2	Land use claim that operation of pipeline is similar to manufacturing	L	Not addressed	N	Addressed by EFSEC
156	32-68	Is the Columbia River site appropriate	L	Not addressed	Y	Alternatives section

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	A	B	C	D	E	F
	Comment Number	Comment Concern	EIS Issue	Location in Application	Impact Analysis	Comment Addressed
18						
157	3-4	Why such a prime shoreside site?	L	2.1.1	N	Addressed by EFSEC
158	7-4	Critical Areas Ordinances	L	4.2.1	N	Addressed by EFSEC
159	9-6	Carbon Mitigation measures	M	2.11.4	Y	Air quality section of EIS
160	7-1	Mitigation measures of CO2 emissions	M	2.11.8	Y	Air quality section of EIS
161	3-1	How soon will we see sequestration	M	2.11.8	Y	Air quality section of EIS
162	8-3	Full mitigation considering all construction and operational impacts	M	1.4	Y	Air quality section of EIS
163	8-8	How soon will we see sequestration	M	2.11.8	Y	Air quality section of EIS
164	8-13	Mitigation measures of CO2 emissions	M	2.11.8	Y	Air quality section of EIS
165	8-15	CO2 emissions reduction mitigation measures	M	2.11.8	Y	Air quality section of EIS
166	8-16	Steps to capture and sequester CO2 emissions, including timeline	M	2.11.8	Y	Air quality section of EIS
167	8-16a	Technological barriers to sequestration	M	2.11.8	Y	Air quality section of EIS
168	8-16b	Type of storage for CO2 capture and impacts	M	2.11.8	Y	Air quality section of EIS
169	8-17	Cost of Sequestration	M	2.11.8	Y	Air quality section of EIS
170	14-4	Cost of Sequestration	M	2.11.8	Y	Air quality section of EIS
171	14-5	Sequestration unproven technology	M	2.11.8	Y	Air quality section of EIS
172	15-2	Carbon Mitigation measures	M	2.11.8	Y	Air quality section of EIS
173	15-5	Equipment investment not a CO2 mitigation measure as well as research and development	M	2.11.8	N	Addressed by EFSEC
174	15-6	Define Carbon Ready	M	2.11.8	N	Information to include in EIS
175	21-3	Questions viability of sequestration	M	2.11.8	Y	Air quality section of EIS
176	29-2	Sequestration to expensive	M	2.11.8	N	Addressed by EFSEC
177	30-2	Questions viability of sequestration	M	2.11.8	Y	Air quality section of EIS
178	31-2	Questions viability of sequestration	M	2.11.8	Y	Air quality section of EIS
179	35-3	Explain meaning of carbon capture ready	M	2.11.8	N	Information to include in EIS
180	35-4	Carbon capture ready cannot be considered mitigation	M	2.11.8	Y	Air quality section of EIS
181	36-9	EIS should consider CO2 impacts with/with out carbon sequestration	M	2.11.8	Y	Air quality section of EIS
182	37-9	Mitigation should be sequestration, not other proposals included in the application.	M	2.11.8	Y	Air quality section of EIS
183	8-21	Transmission Impacts	O	Not addressed	?	Need more information
184	8-22	Impacts to building pipeline	O	Throughout	?	Need more information
185	8-4	Impacts in all areas should be considered in depth	O		N	EIS should address all issues,but focus on key issues
186	9-1	EIS should be comprehensive	O		N	EIS should address all issues,but focus on key issues
187	6-2	Mayor at risk	O	Not addressed	N	Resolved at local level
188	8-24	Energy Northwest's Cost assumptions	O	Not addressed	N	Addressed by EFSEC
189	9-8	Vote by the people - RCW 80.52	O	Not addressed	N	Addressed by EFSEC
190	10-6	Too much Federal backing for IGCC	O	Not addressed	N	Comment noted
191	13-1	Inappropriate use of public funds	O	Not addressed	N	Addressed by EFSEC
192	15-3	Vote by the people - RCW 80.52	O	Not addressed	N	Addressed by EFSEC
193	35-5	Meet the Financing Voter Approval Act	O	Not addressed	N	Addressed by EFSEC
194	8-20	Vote by the people - RCW 80.52	O	Not addressed	N	Addressed by EFSEC
195	32-51	Consider the cumulative impact of coal mining	O	Not addressed	N	Outside scope of EIS
196	32-70	EIS should be comprehensive	O		Y	EIS should address all issues,but focus on key issues
197	36-4	EIS should consider environmental and health costs of extracting the energy.	O	Not addressed	N	Outside scope of EIS
198	14-3	Initiative 937 should be addressed	PN	Not addressed	N	Addressed by EFSEC
199	8-18	Initiative 937 should be addressed	PN	Not addressed	N	Addressed by EFSEC
200	8-19	Reliability of IGCC coal plant as back up to other renewable sources	PN	Not addressed	N	Outside scope of EIS
201	15-7	Should not be a back up to wind energy	PN	Not addressed	N	Purpose/need section of EIS
202	15-10	Why project is needed	PN	Introduction	Y	Purpose/need section of EIS
203	15-11	Power plants create the need for more power plants	PN	Not addressed	N	Comment noted
204	24-4	Should invest in renewables and conservation	PN	Not addressed	Y	Purpose/need section of EIS
205	32-66	Is the energy needed	PN	Introduction	Y	Purpose/need section of EIS

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18						
206	36-3	Include growth in renewables, conservation, and efficiency.	PN	Not addressed	Y	Purpose/need section of EIS
207	4-1	Impacts to aesthetics	S	4.2.3	Y	Visual impact on local residents
208	4-3	Character of Kalama's future	S	4.4	N	Addressed by EFSEC
209	4-4	Effects to Kalama over the next 25-50 years	S	4.4.2	N	Addressed by EFSEC
210	5-1	Character of Kalama	S	4.4	N	Addressed by EFSEC
211	5-3	Visual impact	S	4.2.3	Y	Include visual analysis in EIS
212	8-23	Environmental equity issues	S	1.4.2	N	Information to include in EIS
213	9-7	Socioeconomic Impacts	S	4.4.2	Y	Construction
214	18-5	Need an economic and risk benefit analysis	S	Not addressed	N	Addressed by EFSEC
215	23-5	Opposes overall cost to develop plant	S	Not addressed	N	Addressed by EFSEC
216	29-3	Cost increases to pay carbon tax	S	Not addressed	N	Addressed by EFSEC
217	32-16	Costs of CO2 and other greenhouse gas emissions using cost/ton externality value methodology	S	Not addressed	N	Not within the scope of the EIS
218	32-17	Evaluate societal costs to offset CO2 emissions	S	Not addressed	N	Not within the scope of the EIS
219	32-20	Analyze market for slag	S	Not addressed	Y	Part of analysis needed to determine storage and transport
220	32-27	Consider impacts on minority and native populations	S	1.4.2	N	Information to be included in EIS
221	32-53	Analyze environmental and economic effects of the transmission line	S	Not addressed	?	Insufficient information in ASC
222	32-69	The EIS should consider socioeconomic impacts.	S	4.4	N	Information to include in EIS
223	35-6	Assess costs of the facility, distribution, waste disposal, fuel and environmental.	S	4.4	N	Information to include in EIS
224	36-1	Project benefits outweigh the impacts of coal mining.	S	Not addressed	N	Outside scope of EIS
225	37-5	Economic risk analysis including potential future carbon tax	S	Not addressed	N	Addressed by EFSEC
226	38-1	Impact on property values	S	Not addressed	?	Information to be included in EIS
227	36-11	Assess costs of increased air pollution on efforts to comply with CAA and costs on public health	S, H	Not addressed	N	Outside scope of EIS
228	8-7	Impacts from transportation	T	4.3.2	Y	Transportation section of EIS
229	17-4	Source of fuel and how will it get to Kalama	T	2.3.14	N	Information to include in EIS
230	18-6	Source of fuel and how will it get to Kalama	T	2.3.14	N	Information to include in EIS
231	23-3	Source and transport of coal	T	2.3.14	N	Information to include in EIS
232	24-3	Source of fuel and how will it get to Kalama	T	2.3.14	N	Information to include in EIS
233	32-52	Consider impacts of transportation of coal	T	4.4	Y	Consider Centralia Power plant using Powder River Basin coal
234	32-59	Analyze effect of pier extension in Columbia River	T	Not addressed	?	Has to be included in EIS
235	32-60	Consider effect of increased vessel use at pier	T	Not addressed	?	Need more information
236	32-65	Thorough analysis of alternatives	TA	2.19	Y	Alternatives section
237	18-8	Other renewable energies/alternatives	TA	2.19.5; 3.6.5	Y	Alternatives section of EIS
238	22-2	More renewable energy	TA	Not addressed	Y	Purpose/need section of EIS
239	23-1	More renewable energy	TA	Not addressed	Y	Purpose/need section of EIS
240	25-2	Should spend money on renewables	TA	Not addressed	Y	Purpose/need section of EIS
241	2-2	IGCC unproven Technology	TA	Not addressed	N	Information to include in EIS
242	8-1	Alternatives - nuclear energy	TA	Not addressed	Y	Alternatives section of EIS
243	10-1	Save Fossil Fuel	TA	Not addressed	N	Purpose/need section of EIS
244	10-5	Alternatives - nuclear energy	TA	Not addressed	Y	Alternatives section of EIS
245	11-3	Other renewable energy	TA	Not addressed	Y	Purpose/need section of EIS
246	12-3	Other renewable energy/alternatives	TA	Not addressed	Y	Purpose/need and Alternatives section
247	15-8	IGCC will sabotage green power	TA	Not addressed	N	Addressed by EFSEC
248	15-12	Need more renewable energy	TA	Not addressed	N	Comment noted
249	16-1	Coal-fired power plant the worst	TA	Not addressed	N	Comment noted
250	16-3	Other renewable energies/alternatives	TA	2.19.5, 3.6.5	Y	Alternatives section of EIS
251	17-1	Coal-fired power plant the worst	TA	Not addressed	N	Comment noted
252	17-2	Other renewable energies/alternatives	TA	2.19.5; 3.6.5	Y	Alternatives section of EIS
253	17-5	Miles of pipeline to be constructed	TA	2.19.5; 3.6.5	N	Information to include in EIS
254	18-7	Miles of pipeline to be constructed	TA	2.3.16.1	N	Addressed by EFSEC

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	A	B	C	D	E	F
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18						
255	20-1	Opposes coal power plant	TA	Not addressed	N	Comment noted
256	21-1	Why not renewables	TA	Not addressed	Y	Purpose/need section of EIS
257	23-4	How many miles of pipeline	TA	2.3.16	N	Information to include in EIS
258	32-49	EIS should consider alternatives to pipeline	TA	2.19.3	Y	Alternatives section of EIS
259	32-67	Is a coal plant really the appropriate choice	TA	Not addressed	Y	Purpose/need section of EIS
260	36-5	Alternatives to the project	TA	Not addressed	Y	Alternatives section of EIS
261	32-18	Analyze the facility waste management plan	U	Not addressed	?	Not included in ASC
262	32-19	Analyze slag production and disposal, including storage, transportation, and disposal	U	Not addressed	Y	Should be addressed in several sections of the EIS
263	7-3	Water rights transferable	W	2.5.3	N	Addressed by EFSEC
264	18-3	Toxins in the Water	W	2.8	?	Insufficient information in ASC, information to include in EIS
265	32-21	Analyze impacts of the waste water discharge	W	2.8	?	Insufficient information in ASC, information to include in EIS
266	32-23	Analyze major new heat source to river	W	2.8	?	Insufficient information in ASC, information to include in EIS
267	32-24	Analyze impacts of toxics in waste water discharge	W	2.8	?	Insufficient information in ASC, information to include in EIS
268	32-28	Evaluate impacts of new or modification of port NPDES permit to allow discharge	W	Not addressed	N	Information to be included in EIS
269	32-29	Is it feasible to discharge under the ports permit?	W	2.8	N	Information to be included in EIS
270	32-30	If a new discharge permit is required, what will it look like?	W	5.2	N	Addressed by EFSEC
271	32-31	Will the discharge comply with pretreatment regulations, can they qualify as a pretreater?	W	2.8	N	Addressed by EFSEC
272	32-32	Analyze volume, constituents, and rate of stormwater discharge	W	2.1	Y	Water quality section of EIS
273	32-33	Analyze effectiveness of stormwater detention pond and how stormwater is discharged	W	2.1	Y	Water quality section of EIS
274	32-34	Evaluate possibility of PMEC not obtaining water	W	Not addressed	Y	Addressed by EFSEC
275	32-37	Evaluate impact fo precluding future water users	W	Not addressed	N	Outside scope of EIS
276	32-38	Will water right transfer require a change in location or change in use?	W	Not addressed	N	Addressed by EFSEC
277	32-39	Analyze the environmental and economic impact of the change in use.	W	Not addressed	N	Addressed by EFSEC
278	32-40	Evaluate potential to influence surface flows or groundwater recharge	W	3.3.4	N	Information to include in EIS
279	32-48	Consider pipeline impacts on Kalama River	W	2.19.3	?	Not enough information
280	32-54	EIS consider impacts from flooding	W	3.3.3	N	Information to include in EIS
281	32-55	Increase flood potential from wetland fill and paving of permeable surfaces	W	Not addressed	N	Information to be included in EIS
282	32-56	Consider groundwater contamination during flooding	W	Not addressed	N	Information to be included in EIS
283	32-57	Evaluate if high groundwater will interact with the plant structure and containment systems	W	3.3.4	?	Insufficient information in ASC, information to include in EIS
284	33-4	The applicant has not demonstrated that the water rights are transferrable	W	Not addressed	N	Addressed by EFSEC
285	33-5	PMEC does not have sufficient water for the project	W	2.5.3	Y	Information to include in EIS
286	33-11	The site is a designated aquifer recharge area under the CAO	W	Not addressed	N	Addressed by EFSEC
287	36-15	Thermal impacts to the Columbia River	W	2.8	?	Information to be included in EIS
288	37-2	Potential water quality impacts on Columbia	W	2.8	?	Information to be included in EIS
289	37-3	Stormwater runoff, potential hazardous pollutants	W	2.1	?	Information to be included in EIS
290	37-4	Evaluate wastewater heavy metals impacts on threatened fish species	W	2.8	?	Information to be included in EIS
291	26	Duplicate of #19 comments				

E

Significance Thresholds

The significance thresholds listed below were used by Ecology and Environment, Inc., staff in reviewing the Application to determine what environmental issues would potentially be significant.

1. Air Quality

1. Emissions would violate any ambient air quality criterion.
2. Emissions would increase the number or frequency of violations.
3. Conflict with implementation of a Washington or Oregon air quality plan.
4. Result in a cumulatively net increase of any criteria pollutant for which the project region is non-attainment or would result in non-attainment.
5. Expose sensitive receptors to substantial pollutant concentrations.
6. Result in objectionable odors affecting local residents and businesses.

2. Geology, Soils, and Geohazards

1. Expose people or structures to the potential risk of loss, death, or injury involving:
 - a. Rupture of a known fault
 - b. Strong seismic ground shaking
 - c. Seismic related ground failure
- d. Landslides
2. Result in substantial soil erosion or loss of topsoil.
3. Located on a geologic unit or soil that is unstable or would become unstable because of the project.
4. Be located on expansive soil as defined in the UBC.

3. Water Resources

1. Would violate any water quality standard or waste discharge requirement.
2. Substantially deplete groundwater supply or interfere with ground water recharge.
3. Substantially alter the existing drainage pattern of the site that would adversely affect off-site resources.
4. Substantially increase the rate or amount of surface runoff that would adversely affect off-site resources.
5. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater systems.
6. Provide substantial additional sources of polluted runoff.

7. Potentially substantially degrade water quality.

4. Habitat, Wildlife and Special Status Species

1. Have a substantial adverse effect, either directly or habitat modification on any state or federally listed sensitive species.
2. Have a substantial adverse effect on any riparian or other sensitive natural community identified in local, state or federal plans, policies or regulations.
3. Have a substantial adverse effect on federal or state protected or regulated wetlands.
4. Interfere substantially with the movement of native resident or migratory fish or wildlife species.
5. Result in the displacement of substantial numbers of wildlife species, individually or collectively.
6. Conflict with local policies or ordinances protecting biological resources.
7. Conflict with the provisions of an approved habitat conservation plan.

5. Land Use, Recreation, and Visual Resources

1. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project.
2. Conflict with any designated habitat conservation area, such as habitat mitigation areas or easements.
3. Directly or indirectly substantially affect a public or private recreational use area.
4. Cause an increase in use of existing recreational use areas in the vicinity of the project that would result in substantial deterioration of the facility.
5. Have a substantial adverse effect on a scenic vista.
6. substantially damage scenic resources.
7. Substantially degrade the existing visual character or quality of the site and its surroundings.
8. Create a new source of light or glare that would adversely affect day or nighttime views in the area.

6. Socioeconomic and Housing

1. Displace substantial numbers of existing housing units or people.
2. During construction result in the need for the creation of temporary housing in the vicinity of the project.

3. Potentially result in a rapid increase in the price of goods, services, and housing in the vicinity of the project.

7. Public Services and Facilities

1. Result in a substantial adverse physical impact associated with the need for new or expanded government facilities or equipment, such as stormwater systems, schools, and medical facilities.
2. Result in a substantial adverse impact associated with the need to increase public services, response times, or other performance objectives for fire, police, schools, and other public employees.

8. Hazardous Materials and Waste Management

1. Create a significant hazard to the public or the environment through the transport, use, or disposal of hazardous material.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of a hazardous substance.
3. Result in a safety hazard for people residing or working in the vicinity of the project.
4. Impair implementation of or physically interfere with an emergency response or evacuation plan.
5. Expose people or structures to a significant risk of loss, injury, or death from accidental fire or explosion.
6. Create a significant amount of waste material to disposed of on or off-site.

9. Transportation

1. Cause an increase individually or cumulatively in traffic that results in a change to level of service for roads in the vicinity of the project during construction or operation of the facility.
2. Substantially increase hazards due to rail or highway design limitations or other design features.
3. Results in inadequate parking capacity.
4. Results in a substantial increase in rail or waterborne traffic that limits existing or future potential use of the rail or waterway system.

10. Cultural Resources

1. Cause a substantial adverse change in the significance of a historical or archaeological resource.
2. Directly or indirectly impact a unique paleontological, geologic, cultural, or archaeological feature or site.

11. Safety and Human Health

1. Substantial potential for upset or accidental conditions to cause evacuation of the facility.
2. Cause a substantial increase in electromagnetic fields above existing ambient field strengths that could affect local residents or workers.
3. Electromagnetic fields would potentially cause substantial interference and disruption of electronic devices.

12. Noise and Vibration

1. Exposure or generation of noise levels in excess of local and state regulations.
2. Exposure or generation of noise substantially above ambient noise levels at sensitive receptors in the vicinity of the project.
3. Exposure of persons to excessive ground vibration or groundborne noise levels.