Letter 10

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ENERGY FACILITY SITE
EVALUATION COUNCIL

April 15, 2000

Mr. Allen Fiksdal, Manager
EFSEC
P.O. Box 43172
Olympia, WA 98504-3172

Subject: Second set of comments on the DEIS for Sumas 2

Dear Mr. Fiksdal:

Following are my comments on the second part of the DEIS for Sumas 2. The first set was sent to your office dated April 6, 2000.

Section 3.6, Visual Resources

The viewer sensitivity section (P.3.6-1,2) is deeply flawed. To presume that persons can be categorized into "low", "moderate", or "high" sensitivities to views by their occupations or activities is ludicrous. Any "farmer" or "factory worker" can be as sensitive and appreciative to his/her viewshed as anyone else, and to lump viewers into categories is class discrimination of the worst sort. ALL people deserve the best possible views of their landscapes. 1

The mitigation by planting large trees to screen views of the major plant site is deficient - it takes many years for even large trees to grow to a size where views are affected. 2 There is NO mitigation for 75-foot tall power poles and associated power lines. Trees would have to be removed or topped, and the dominate view that can only be described as "ugly" would be of power lines. 3 Assessors and knowledgeable realtors in this region have reported a 30-40% loss in assessed value to properties adjacent to large power lines. 4 The loss is largely due to the visual effects of the lines, but also includes concerns from EMF's emitting from the lines. Reasonable compensation should be provided to property owners by S2GF for their loss of assessed value. No amount of money can compensate for destroying a pleasing, aesthetic view.

In addition to the large physical objects (plant, power lines) that interrupt views, the emissions discharged constantly from S2GF will impact smog conditions that already exist in the Sumas and Fraser River valleys. This topic should be addressed in the DEIS under "Visual", and is not. 5 The prevailing winds concentrate the pollutants in the Chilliwack area of the Fraser River Valley, and have made it the third worst smog

area in Canada. The 2-3 tons per day of regulated pollutants and 7,000 tons per day of CO2 emitted by S2GF will exacerbate an already serious problem.

Section 3.7 Cultural Resources

No comment.

Section 3.8 Socioeconomics

Stormwater treatment (P. 3.8-11) is dismissed lightly in the DEIS. In a recent ruling (The Garcia case), the EPA can now enforce the Clean Water Act by regulating non-point sources (i.e., runoff) into waterways. The Sumas river is already contaminated from direct discharge (City of Sumas) and urban runoff. The DEIS states that the runoff will be treated by "best management practices" before discharge into Sumas Creek. The "best management practices" need to be well-defined in the EIS. It should be pointed out that Sumas Creek flows into Johnson Creek, a salmon-bearing stream. 6

Apparently, no thought has been given to limiting impervious surfaces (parking lots, etc.) so that water falling on the site can be recharged to the aquifer. Parking lots, streets, etc., are a major source of pollutants during a rain event. Parking lots of permeable material (gravel) will remove some of the contaminates as the moisture filters into the aquifer, and there is no major runoff. In addition, the landscaping in the vicinity of S2GF should be as natural as possible to avoid the use of herbicides, insecticides, and fertilizers. 7

Not mentioned in this section is the fact that cooling water discharge will go to the Abbotsford (Canada) treatment facility. How will the cooling water discharge be handled if permission is denied by the Abbotsford facility? Those plans need to be made clear. 8

Section 3.9 Energy

There is no shortage of power in the Pacific Northwest. There is no foreseeable shortage. There are at least 10 sites already approved by EFSEC, and those plants are not being constructed.

A recently released report of BPA (p. 3.9-5) cites a possibility of outages under extreme drought or temperature conditions, plus a series of events very unlikely to occur at the same time. For drought conditions, the report goes back nearly 70 years to 1932 (dust bowl, depression), and for temperature (cold) conditions, the year 1950 is 9

used. If these unlikely events were to occur, a temporary outage would occur, but no major shortage.

Section 3.10 Traffic, etc.

No comment.

Section 3.11 Health and Safety

The constant noise emitted from a power plant is not covered in this section, but it is a definite health-related issue. I discussed it briefly in my previous response, but would like to add the following: There will be people living in the vicinity who will be adversely impacted by the constant, penetrating whine. It can be manifested from simple annoyance to sleep depravation. Sound barriers may work to a point, but persons may have to be compensated if the barriers don't work. In any case, the noise will degrade the quality of life significantly. 10

I also discussed the power line health hazard briefly in previous remarks, but I'd like to emphasize a couple of points: The metal-clad buildings and metal-roof buildings near the powerline ROW need to be grounded. Farmers with livestock need to be informed of possible electric shock from induced current near the powerlines. If necessary, fencing should be provided to keep animals and humans away from the ROW, and people should be adequately informed of the danger. 11

Yours truly,

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cc: Mary Barrett