Letter 107

Sumas Energy 2 Generation Facility
DEIS Comment Form

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ENERGY SITE
COUNCIL

Draft EIS Public Meetings

Whatcom County Council Chambers
Bellingham, WA April 3, 2000

American Legion Post 212
Sumas, WA April 4, 2000

Please fill this comment form out and leave it at the door before you leave. Be sure to include your name and address. Comments may also be submitted to EFSEC in writing until the close of the comment period (postmarked by April 17, 2000). Please use the back of this form or additional sheets of paper if necessary. If you mail your comments, please send them to the Lead Agency Responsible Official, Allen Fiskdal:

Allen Fiksdal, EFSEC Manager, PO Box 43172, Olympia, WA 98504-3172

NAME: FRED & LAURIE HOEKSTRA
ADDRESS: 34691 1ST AVE. ABBOTSFORD, B.C. V2S-8C2

COMMENTS: We are very disappointed in the information available in the draft. There are contradictions throughout, and some very important issues are not addressed at all. Section 3.1 deals with air quality and the effects the emissions from this plant will have on existing air quality problems. However, in adding the emissions from the plant to data collected from the Abbotsford Airport, it gives an underestimated view of what air quality would truly be like. All data from existing air quality should be collected in the areas of Chilliwack - Hope, otherwise any discussion of existing air quality in this chapter is useless information. The entire chapter needs to be re-written with proper information from the right testing areas. Section 3.1.2.3 states that S2GF would be subject to the requirements of the Clean Air Act, but it does not state how it would meet these requirements and what would happen if it didn't (ie. is there an agency with the authority to shut down a facility such as this if they are not complying with regulations?). The use of the acronym BACT throughout the chapter is completely non-informative and not a good explanation for those looking for real information. As well, section 3.1.2.4 states that BACT would be determined on a case by case basis depending on economic, energy, and environmental costs. Does this mean then that if BACT costs too much in a

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further to say that what constitutes BACT at the time of final permit review will define the emission limits for the project. So if BACT has not yet been determined for this project, how are we supposed to review BACT at all? What was the point in informing us of BACT if it hasn't even been determined yet? We would like specifics. Farther on it identifies the Class I and Class II areas of Washington state, but it does not state whether Abbotsford and the Lower Fraser Valley are included under either the Class I or Class II designations. Otherwise there doesn't seem to be any mention of what the provincial regulations are for air emissions from this plant and whether they will be exceeded, and what provincial agencies will also be involved in the monitoring of this plant. While we do realize that this is strictly an American owned plant, the environmental impacts will be much greater for Canadians than Americans, and this draft is an environmental impact statement, not just an American environmental impact statement and only a fool would believe that no impact would occur north of the border. Therefore, we expect to see an accounting of Canadian impacts as well. Section 3.1.3 discusses PM 10's, but does not elaborate on how much of this consists of PM-2.5's. Where is this information? There is mention that the GVRD air emission objectives would be exceeded at given times, and yet at the end of the chapter, section 3.1.8, it states no significant adverse air quality impacts would occur. You can't exceed the GVRD objectives and yet have no significant impact. This needs to be clarified.

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If the GVRD objectives are exceeded, what measures are in place to immediately improve the air quality? What regulatory bodies are responsible for shutting down the plant until BACT is employed to resolve the situation? This needs to be clarified. Section 3.1.4.2 page 25 states that the highest extinction co-efficients would be in the Lower Fraser Valley. And yet tables 3.1-18, 3.1-19 and 3.1-20 only deal with Class 1 areas in Washington state. This makes no sense. Where is the data on how the extinction co-efficients will affect the Fraser Valley? Page 30 states that a natural-gas fired plant would reduce greenhouse gases when compared to a coal-fired plant. This is a ridiculous statement. One could also compare a coal-fired plant to a pile of burning rubber tires, with the coal-fired plant coming out favorably. Where is the data comparing natural-gas fired plants to other plants not fired by fossil fuels? How can a comparison be made if none is given? It goes on to say that there is no regulatory requirement for greenhouse gas mitigation in Washington State. Therefore we must assume that this plant will not have to worry about limiting its emissions of CO_2. This is unacceptable. The Greenhouse Gas Offset Strategic Plan is an insult to all those who will be affected by this plant. It also seems to question the intelligence of those who accepted it as a reasonable answer to CO_2 emissions. This is not an acceptable answer, should not have been included in the DEIS, and the problem of CO_2 emissions should be dealt with seriously, not flippantly. We expect a better plan than that. Section 3.1.5 states

that under the No Action Alternative, if S2GF were not built, then other facilities would likely have to be built to meet the demand for electrica power. However, according to American sources, there is no need for power there, and B.C. Hydro has assured us that not only do we not need to purchase the power, but that Hydro is uninterested in purchasing it at any time in the future. Section 3.1.5 should be omitted from the DEIS as it is completely erroneous and not backed by any factual information. This plant is not expected to sell the power in this area, but to California and elsewhere and this should have been clearly stated. 16

Chapter 3.2 deals with water resources. It is suggested throughout the section that smaller private wells may go dry because of the large demand this plant will have for water. However, nowhere does it state how the plant will deal with dry wells. It also does not state how the higher nitrate levels will be dealt with, or what those levels are already in those wells, and whether they already exceed acceptable safety levels (as some already do). There is also no information on how pumping such a large amount of water from the aquifer will result in land-sinkage. This is a known consequence of such action and yet is not mentioned at all. There is also no mention of what measures will be taken to offset the risk of raising flood levels once this plant is built on raised land. As no measures are being taken at this time to deal with the Nooksack River and it's responsibilities in 17 18 19 20

causing extreme flooding in this area, any actions taken to exacerbate this problem, such as raising the construction site, should be examined carefully. And yet nowhere in this chapter is anything mentioned on what actions are going to be taken to prevent making a flood worse. This chapter is poorly done and needs much more information. If, as is stated in Section 3.2, no significant unavoidable adverse effects upon water resources were identified, then how can potential drying up of wells, raised nitrate levels and flood levels be explained? Chapter 3.3 deals with noise issues. However, all the data and information deals only with the American side. This site will be less than 1.5 kilometers from the Canadian border and yet no data is provided for how the operation of this plant will affect anyone north of the border. This is unacceptable. Chapter 3.8 Section 3.8.2.4 states that should there be a major fire involving the diesel storage tank, the local fire department would be ill equipped to handle it. Nowhere does it state how the operators of this plant will ensure that the local department will have the equipment, training and manpower to ensure the safety of those nearby. On page 4 of section 3.8 that in case of emergency people could be transported to the MSA Hospital in Abbotsford. It appears that no research was done in compiling this DEIS; otherwise it would have been discovered that the MSA Hospital is unable to cope even with current caseloads and would not be able to handle an emergency. Residents then would have to choose between the distant St. Joseph's

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Hospital in Bellingham, or to go even furth
on to Vancouver, B.C. This should be stated c 24
clarified Once again this DEIS is poorly research
as indicated on page 3.10-16; where stated t
primary fuel source for diesel would be S
Canada in Abbotsford or Surrey. It stated th
would be 4 trucks per hour during a 12 ho
workday But as there are only 2 trucks opera
from both Shell Abbotsford and Surrey, and th
must handle all deliveries from Aggassiz to 25
Delta, the absolute most that could be delivere
in a single day is 2 truck loads a day. Thi
a minor issue but it points out obvious
erroneous assumptions How much more is there
this draft that is based on assumptions, not
fact? This draft doesn't deal at all with the
questions of how the IPL would affect AM, 26
cell tower and antenna transmissions to tho
residents east of the towers. There is very litt
information dealing with electromagnetic fields 27
It seems to be treated as a last minute conc
We want to see more up-to-date statistics
this. As well, there is nowhere in this draft
discussing what will be in the wastewater. 28
Can an entire emission from this plant b
ignored? This is ridiculous and must be provide
We expect to see these issues clearly laid out w
more up-to-date information and data in
revised DEIS. We also expect that a copy of the 29
revised draft will be made available for us, u
this last draft that was not forthcoming.