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Letter 148

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ENERGY FACILITY SITE
EVALUATION COUNCIL

Re: Comments on Sumas Energy 2 Generation Facility Draft EIS

The EFSEC committee should require a second Draft EIS for the public to make comment on. The EFSEC public hearings revealed there were far too many concerns addressed by the citizens of Whatcom County and neighboring Canadians that were not adequately addressed in the DEIS. It appears that Jones & Stokes took the application, prepared by Dames & Moore, and molded it into a DEIS template. From comments made by local citizens in response to the DEIS, it appears the Jones & Stokes company did very little actual on site evaluation. We are not getting our moneys worth from this document. Would the amount of "No significant adverse impacts" statements change in the DEIS if there were a thorough study done of the environment? The consultants did such a poor job of the DEIS that it should not go directly to the final EIS phase. This process should not be fast tracked, but should allow for complete evaluation. 1

Complete DEIS

The DEIS should address a full radius of impact around the plant. The environment knows no borders and if this is to be placed in our county we need take into account all of the areas around the plant that are impacted, here and north of the border, in the DEIS. If Canada's environment is not considered in this, then this is not a complete environmental impact statement. For example, what are the impacts of effluent on the fish and wildlife that live "downstream" in the Fraser River. It is unconscionable to not include them 2

Need for Power?

The need for the power is in the pocketbook of Sumas Energy 2. Whatcom County currently produces 675 megawatts of electricity and consumes 370 megawatts. This excludes Intalco aluminum who buys their 470 megawatts of electricity directly from Bonneville Power Administration. The market for this excess electricity is in the southern states such as California and Arizona. We should not use natural gas to produce electricity and lose approximately 30% of the natural gas potential in the process. Then move that electricity over a great distance. We are wasting resources, since the farther electricity travels the more line loss occurs. What would be the economic impact, gain or drain, on Sumas Energy 2 to build a plant in California or Arizona, closer to the need? Page 1-3 of the DEIS uses some quotes from a report titled, 3

The *Washington State Electricity System Study* submitted by the Washington State Department of Community, Trade and Economic Development (CTED). The primary goal of this commission is to encourage business, including industrial development. Obviously they have not taken into consideration the negative impacts this type of industry would have on our community and its environment, since they are looking strictly at the economics of such a project. What would the impact be if the state created a statewide growth plan for power and its generation on this project? If there are currently permits issued for some eleven power plants, what criteria is used to determine the need for another power plant in Whatcom County? 4

Alternative Energy Sources

Conservation is a potential source of energy that has not been pursued to it full potential. Renewable energy resources should be utilized before we consider using fossil fuels to produce electricity. We should not continue to rely on fossil fuels. Our governor spoke at The Seattle Summit on Protecting the World's Climate last month, an international symposium on clean energy and climate and air quality protection. His topic was titled "How Our Region Can Spur a Global Energy Transformation". We need to think proactively and not continue to consume fossil fuels, but look at alternatives. We do not condone approving a natural gas fired power plant in this area, especially with current air quality conditions in the Canadian lower mainland. A decision to approve such a permit is based entirely on economics, with total disregard for the environment. 5

Associated Powerlines

The DEIS did not adequately address the impacts that these powerlines would have on the local economy. We have one of the most pristine views of mountains, that would be impaired by the proposed transmission powerlines. Tourism is a large, clean industry in Whatcom County. It is unreasonable to site a power generation facility in Sumas and run a total of 48 miles of transmission lines throughout the county. Whatcom County has a major electrical corridor running from Canada south. The citizens of the county have already made it clear, via Ordinance 4-90, that running transmission lines through our bucolic country side is not appropriate here. If a plant truly were deemed necessary, it should be placed near the existing corridor, in order to eliminate unnecessary transmission lines. Sumas is not an appropriate site for this facility. 6

"BACT" and "State of Art"

Best Available Control Technology and state of art are used to describe the turbines and generators. This terminology is very broad and leaves a lot of room for interpretation. What are the choices that Sumas Energy 2 has and who determines if they are using 'BACT' and 'state of art technology'. Has 7

this information changed since the application was filed or will someone develop an even cleaner system in the coming months? It is our understanding that Sumas Energy 2 has ordered the generators and made a choice based strictly on economics. Does this qualify for BACT and state of art technology? Sumas Energy 2 should spell out exactly what they intend to use. 7

Oil Tank

The 2.5 million gallon fuel oil storage tank should be eliminated from this plan. The risk of contaminating the Sumas/Abbotsford Aquifer is too great of a problem. What would the environmental impacts be if there was an earthquake and/or flood that jolted such an immense tank. The oil back up system is projected to be used in the wintertime. What is the impact on the environment of the delivery trucks bringing oil during a northeaster? 8

Other Concerns

There are many other areas of concern regarding the proposed power plant. 9
The fact that this is located in the flood plain, what would be the impact of a flood on other properties? Powerlines decrease the land value, the DEIS states that it has been known to increase its value. That is totally untrue, 10
particularly transmission lines. What will be the economic impact on the county tax base? There are a lot of places with views of Mt. Baker whose property values would decrease with the addition of 75' - 80' poles. We cannot believe that in many of the wildlife areas there are no significant 11
impacts. They need local input to determine the real impacts.

Sumas Energy 2 is motivated by profits to build this power plant. The energy is not for Whatcom County. We recommend that the council choose 12
the 1.3.2 **No Action Alternative.** Sumas Energy 2 should not be issued a permit under its current application. It is time for EFSEC to deny a permit to build yet another power plant.

Sincerely,

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