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ENERGY FACILITY SITE
EVALUATION COUNCIL

May 2, 2000

Dear Energy Facility Site Evaluation Council

I would like to take this opportunity to address the fact that this is an overwhelming task for any citizen to study and comprehend in the short amount of time allowed. Once the evidence of new funding and the short comings of this DEIS are gathered I would like to see another draft of this EIS. 1

It's very disturbing to me that in our fragile state of being with global warming and natural resources we are even entertaining the idea of this so called "State of the art" power plant. The gross consumption of natural gas, NOT a renewable resource and of water, a precious commodity, well exceeds acceptable levels and will have an environmental impact. 2
At what point do we recognize that "no significant impact" does become significant?? We have no right to make this judgement. An impact is an impact at any level. Mitigation is a very sorry bandaid for such action. 3

The location site of this plant is of great concern — 37 acres of wetland !!! What happed to the rulings of protection for such areas? Oh yes MITIGATION .. recreation of a 2.06 acre wetland with a bulldozer and some vegetation planting. Another unacceptable action!

The eco systems that make up a wetland and very diverse and complex and are seasonally changing. I have my doubts that this study is complete. Was it done over a 12 month period to include water influxes, migration, mating, hatches, etc? or was this a study like that done on the birds — 2 days spent at the worst time of year to complete an assessment for the species found on the proposed site. 4

NOTE: I believe the bird study needs a further and more complete evaluation. One year recommendation to document ~~[illegible]~~ findings. Any less time is not sufficient to cover all species that seasonally reside in the area. 5

To compound the wetland issue we look at filling a large part of this area with gravel 8 ft high — another non-renewable natural resource undoubtedly excavated out of our local agricultural farmland. 6

Which brings up another contention ... turning valuable land into giant holes in the ground serving no purpose after excavation, not to mention the possible impact on ground water. This issue is quite volatile in Whatcom County and no where in the DEIS did I read where a study was done regarding this significant environmental impact! 6

Next air quality. We should give great attention to this matter ... any degree of emissions is air pollution. It is a global problem that will only continue to escalate.

I understand there is new legislation working to raise the air quality standards ... what effect would this have on the Sumas plant if these changes are made prior to the plant being built? Would the permit alone allow Mr. Jones to violate possible tougher regulations? 7

During the public hearings it was brought to attention that monitoring done for the air quality assessments was conducted at a location west of the plant site. I recomend this evaluation be re-studied since the air is generally channeled north east up the 8

Frazier River Valley towards Chilliwack, B.C.
We know that this community has the third worse air quality in all of Canada, and to allow this plant to contribute to this pollution problem is a shameful wrong act of good neighbors. 8

The escalation of childhood asthma and other respiratory ailments is serious. To just list emission levels in a general, matter of fact way places no true concern for this health hazard. 9

NOTE: The chapter on air quality was terribly hard to grasp in understandable terms.

My final concern which was not addressed at any degree in the DEIS is LIGHT pollution! This is truely a pollution. Already the existing co-gen plant lights up the region. With a plant 5 times as large, it will have great effect on the night sky. Day is light, night is dark.... we need to learn to live with those definitions. 10

To close, lets recognize that we don't need more power for whatcom county. If the region is short of power, define the region and site the plant there. Transmitting electricity to long distance locations is not 11

cost effective in the long run. Certainly EFSEC and Mr. Jones are knowledgeable regarding Line Loss. Conservation is our key to having adequate regional power. 11

We should not be permitting for power plants, but rather for alternative energy sites. The technology is out there.

My recommendation to EFSEC is the NO ACTION ALTERNATIVE regarding this permit for Sumas Energy 2. 12

Sincerely,
Diane Petty

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