

Responses to Comments in Letter 142 from Dirk Petty, Bellingham Resident

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. As discussed in Chapter 2 of the EIS, site selection was based on size requirements, proximity and availability of utilities, compliance with City of Sumas zoning and comprehensive plans, access, and availability of water.
2. The location of the facility is based on size, proximity to available utilities and gas pipeline easement, compliance with City of Sumas zoning and comprehensive plans, access to the site, and availability of the property.
3. The load/resource balance changes with time. S2GF is anticipated to have a useful life of at least 30 years. The load/resource balance for Whatcom County may look considerably different in the future due to load growth and retirement/decommissioning of older generating facilities. Having excess generation in a given county is not uncommon. Consider Grant, Chelan, and Douglas Counties where large generating installations are located on the Columbia River.
4. Energy losses do occur with the transmission of electrical energy. Ideally, the generator would be located immediately adjacent to the load. That is not possible in most cases. Power produced by S2GF may actually be consumed in Whatcom County depending on the load/resource configuration/balance at any given time the facility is putting electrical energy into the transmission grid.
5. See Letter 142, Response to Comment 2 (above).
6. See Letter 134, Response to Comment 8.
7. Please see General Response H, which addresses concerns pertaining to environmental risks that would be posed by the 2.5-million-gallon diesel fuel tank. Letter 11, Response to Comment 2 discusses safeguards associated with the diesel fuel tank.
8. Thank you for your comments.
9. Conservation is part of all electric utilities' energy programs and is, in fact, a component of the state's energy policy (Chapter 43.21F RCW). Emphasis has been placed on conservation programs for nearly two decades. However, conservation alone has not met and cannot meet the growing electrical energy needs of the region. Conservation in combination with new generating resources provides the greatest certainty and flexibility for meeting new electrical energy demand.
10. See Letter 142, Response to Comment 9 (above).
11. Thank you for your comments.

12. Wildlife studies were sufficient to identify significant issues and impacts on wildlife. EIS evaluations are intended to focus on rare, threatened, or endangered species, per WAC 197-11-440(6), which defines what level of detail is appropriate for the affected environment of an EIS:

“Succinctly describe the principal features of the environment that would be affected, or created, by the alternatives including the proposal under consideration. Inventories of species should be avoided, although rare, threatened, or endangered species should be indicated.”

13. As indicated in Section 3.12 of the EIS, MSDS sheets for the toxic or hazardous materials used or stored onsite would be kept on file and provided to local emergency response agencies when the project is operational.
14. Comment noted.
15. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Thus, impacts on property values related to the 115 kV lines would not occur.
16. The 115 kV power lines that run through Whatcom County are no longer part of the project.
17. Thank you for your comments.
18. See Letter 3, Response to Comment 4 for discussion of EMF health effects.
19. The EMF studies referenced are included following the April 3, 2000 public hearing transcript.
20. Pursuant to WAC 463-42-075, SE2 would establish and maintain several forms of insurance during construction and operation of S2GF. Detailed discussion of these insurance coverages is in Section 1.3 of the Application for Site Certification. Insurance would be maintained as required by law, customary business practice, and third-party participants and lenders. The following coverages would be included:

Commercial General Liability Insurance, Automobile Insurance, Property Insurance, Boiler and Machinery Insurance, Workers Compensation and Washington Stop Gap Liability.

SE2 would be responsible as required by law for acts of environmental impairment related to ownership and operation of the S2GF. No set-aside from operating funds is proposed for site decommissioning. However to the extent site facilities are not otherwise removed, recycled, or salvaged, SE2 would maintain ongoing responsibility for site facilities and site integrity as the site owner.