

Responses to Comments in Letter 247 from Ladd Shumway, Lynden 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. The need for power in the region is projected to increase. S2GF could serve as one of the means to meet that need.

As discussed in Letter 3, Response to Comment 2, the Canadian MELP concluded that air toxics or other regulated pollutants emitted from the proposed facility would not be expected to increase the frequency for exceeding British Columbia or Washington State air quality objectives or standards (Volume 1, Appendix K, page vii).

2. Please see General Response G for a discussion of the impact of groundwater withdrawal on streamflow.
3. The City of Sumas, in its 1999 Water System Comprehensive Plan, indicates that in the event of a water shortage, residential customers would have first priority to receive water from the municipal water supply. SE2 understands that the water supply to the plant could be reduced or curtailed in the event of reduced capacity from City wells. The applicant has also proposed that they would mitigate any impairment of water quantity to private wells and water rights within a one-mile radius of the Sumas municipal well field south of the Canadian border that results from the increased pumping required for the S2GF project (Adjudicative Hearing Transcript, testimony of Ms. McGaffey, pages 906-910). These provisions are discussed in Section 3.2.5.2 of the FEIS.

As discussed in the EIS, the City of Sumas intends to put its full water rights to beneficial use. A City of Sumas official indicated that the City determined there is sufficient water available for the next 20 years for other new businesses in addition to SE2. After that, additional water availability is not as certain (Adjudicative Hearing Transcript, testimony of David Davidson, pages 946-957).

4. Please see General Response J for a discussion of the impact of placing fill in the floodplain.
5. Please see General Response J for a discussion of the use of gravel for construction of the plant.
6. Numerous safety measures have been incorporated into the conceptual design of the fuel tank to guard against a release of fuel, including an impervious bermed holding pond that would accommodate more than the full volume of the tank contents. These are discussed in the Application for Site Certification and the Final EIS. In addition, the site is situated on a thick sequence of relatively low-permeability sediments that would greatly impede any migration of contaminants to the aquifer. With proper measures to detect and contain leakage, and emergency rapid response procedures to clean up releases, the potential for contamination of the aquifer is considered low.

7. See Letter 3, Response to Comment 4.
8. 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. Please see General Response B for impacts of Canadian power lines.
9. 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. The 230 kV line would follow existing utility and railroad ROW to the BC Hydro Clayburn station.
10. The crossing of the Nooksack River is no longer being considered as part of the proposed action. Therefore, flight patterns of birds that use the river corridor would not be affected.