

**Responses to Comments Presented at Public Hearing  
Held April 3, 2000 in Bellingham**

**187 Darryl Ehlers**

1. Thank you for your comments.
2. 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. Therefore, trees would not need to be removed in Lynden.
3. The 115 kV transmission lines have been eliminated as an alternative.
4. The S2GF would not have a need for sludge ponds. The blowdown water from the cooling tower would contain metals at concentrations that are permissible for discharge into public sewer systems. To the extent that dissolved solids are removed by reverse osmosis, they will be contained and disposed in accordance with landfill requirements, rather than disposing of them through the sanitary sewer system.
5. The original comment period for the Draft EIS was to have ended on April 17, 2000, which was 30 days after publication. Prior to and during the public comment meetings on April 3 and 4 in Bellingham and Sumas, EFSEC received requests to extend the comment period. Based on these requests and as provided in the Washington Administrative Code (WAC) 197-11-455(7), EFSEC extended the comment period 15 days to May 2, 2000.
6. Please see General Comment D, which discusses potential impacts of groundwater withdrawal on local wells.
7. Evaluating the impact of steam emissions from the existing facility is beyond the scope of this EIS. The impacts of cooling tower plumes associated with the proposed facility were evaluated in the Draft EIS. The conclusions of that assessment were that plume-induced ground-level fog would be very infrequent, occurring for less than one hour per year.
8. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts related to the proposed facility.

**188 Fred Haskell**

1. Thank you for your comments.
2. Thank you for your comments.
3. Thank you for your comments.
4. Thank you for your comment.

**189 Don Peterson**

1. Thank you for your comments.
2. Thank you for your comments.
3. Thank you for your comments.

**190 Craig Lang**

1. Thank you for your comment.
2. Thank you for your comment.

**191 Marian Beddill**

1. Thank you for your comments.
2. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
3. The City of Sumas has a water right for industrial water that they wish to put to use. They are interested in selling this water to SE2, as witnessed by the inclusion of this specific water use in the Water System Comprehensive Plan.
4. Thank you for your comment. However, the financial arrangement between the City of Sumas and their customers is not considered an applicable issue to address in the EIS.

5. A substantial amount of water recycling has been added to the proposal, both to minimize the wastewater stream and to reduce water consumption. Please see General Response D for a discussion of these changes.
6. Please see Response to Comment 5 from Speaker 191 (above).
7. Because no viable fish habitat is present onsite, a culvert would not impede fish passage as is sometimes the case with culverts.
8. Thank you for your comment.

**192 Juliet Thompson**

1. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
2. Please see Letter 9, Response to Comment 5 for discussion of BACT.
3. See Letter 156, Response to Comment 5. Although uncertainty exists regarding groundwater withdrawals, mitigation measures associated with the water right have been proposed to maintain minimum flow in Johnson Creek.

**193 John McKay**

1. Thank you for your comments.
2. The 115 kV transmission lines have been eliminated as an alternative.
3. The two 115 kV electrical transmission line options are no longer part of the proposed action.
4. Thank you for your comments.
5. The 115 kV transmission lines have been eliminated as an alternative.
6. The applicant has identified mitigation measures for potential nitrate contamination of the City municipal well field; see General Response E.
7. See Letter 5, Response to Comment 6.
8. See Letter 5, Response to Comment 7 for discussion of containment/berm liner.
9. The EIS acknowledges that there would be air emissions associated with the proposed project. However, a detailed air quality impact assessment concluded that the emissions

associated with the proposed project would not exceed established regulatory standards. Please see Letter 3, Response to Comment 2.

10. Please see Letter 5, Response to Comment 8 for a discussion of acid deposition as it is related to the proposed project.
11. Thank you for your comment.
12. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts related to the proposed facility.
13. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

**194 Jean McKay**

1. Air quality issues are discussed in detail in the responses to comments in Letter 3.
2. Global warming and greenhouse gas issues are discussed in detail in the responses to comments in Letter 150.
3. Please see General Response D.
4. Please see General Response H.
5. Please see General Response C.
6. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts related to the proposed facility.
7. S2GF will be operated as a “merchant” plant. Thus, power could be sold to purchasers within and outside the Northwest region.
8. EFSEC is the state agency with jurisdiction for siting and regulating thermal generation facilities that exceed 250 megawatts. EFSEC has taken lead agency status pursuant to its rules and the State Environmental Policy Act (SEPA) and must allow S2GF to propose their project. EFSEC reviews the EIS and makes a recommendation about the project. Other sites that EFSEC has considered are addressed in Letter 152, Response to Comment 1.
9. Please see Response 8 above. Volume 1, Appendix H includes Governor Locke’s letter vetoing the proposed tax package.
10. S2GF will be operated as a “merchant” plant. Thus, power could be sold to purchasers within and outside the Northwest region. The need for power is a complex subject and is addressed in several documents (e.g., Washington State Electricity System Study,

Exhibit 28.4; 1999 Biennial Energy Report, Exhibit 28.3; Northwest Power Supply Adequacy/Reliability Study Phase I Report, Exhibit 42.2).

11. Thank you for your comment. Please see General Response A.
12. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
13. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

## **195 Brian Frankish**

1. Use of Canadian water for the facility was an alternative that was considered prior to preparation of the Draft EIS. Once the City of Abbotsford indicated that they would not provide water, this alternative was dropped from further consideration and was not included in the EIS.
2. Thank you for your comments.
3. Based on a revised approach to wastewater discharge, no additional wastewater discharge beyond that which was already contractually agreed to between the City of Abbotsford and the City of Sumas would be required for the project. This revision to the project design is discussed in General Comment I.
4. The Draft EIS evaluated air quality impacts assuming that for up to 15 days per year the facility might burn fuel oil in the event of natural gas disruptions or shortages. The emissions associated with the burning of fuel oil for 15 days each year were included in the air quality impact analysis.
5. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts related to the proposed project.
6. See Letter 107, Response to Comment 26.
7. Thank you for your comments.
8. Thank you for your comments.
9. Thank you for your comments.
10. Thank you for your comments.
11. Thank you for your comments.

**196 Paul DeBruyn**

1. Thank you for your comments.
2. Jones & Stokes provided an independent review of data supplied by the applicant's consultant, Dames & Moore. Jones & Stokes is EFSEC's environmental consultant. EFSEC is the state agency with jurisdiction for siting and regulating thermal generation facilities that exceed 250 megawatts. EFSEC has taken lead agency status pursuant to its rules and the State Environmental Policy Act (SEPA) and must allow S2GF to propose the project. EFSEC reviews the EIS and makes a recommendation about the project.
3. Thank you for your comment.
4. Thank you for your comment. Volume 1, Appendix H contains a copy of Governor Locke's letter vetoing the proposed tax package.
5. Thank you for your comments.
6. In response to public and agency comments, discussion of impacts in Canada has been added to several sections of this Final EIS.
7. The City of Sumas, in their Water System Comprehensive Plan, has determined that there is sufficient water available from their existing water right to accommodate the expected growth and have water left over to sell to SE2. The mayor of Sumas, in a letter to the community dated March 23, 2000, has indicated that the plant would bring needed economic growth and jobs, tax revenue, and a market for unused groundwater (C-007). In addition, SE2 has agreed to pay for the cost of a water treatment system in the event that such treatment becomes necessary after they have begun using water. (See General Response E for further discussion.)
8. See Letter 11, Response to Comment 2, for discussion of engineered safeguards for the diesel tank.
9. See Letter 11, Response to Comment 2, for discussion of engineered safeguards for the diesel tank.
10. See letter 5, Response to Comment 6.
11. Thank you for your comments.
12. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
13. Thank you for your comments.

**197 Mike Kaufman**

1. Thank you for your comments. 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.
2. EFSEC is established and guided by laws set forth in RCW 80.50. Rules relating to Siting Energy Facilities are contained in Title 463 of the Washington Administrative Code.

The State of Washington's energy policy is described in RCW 43.21F. The state's energy usage and planning is described in various documents such as the 1999 Biennial Energy Report (Exhibit 28.3) and the Washington State Electricity System Study (Exhibit 28.4) dated December 31, 1998.

3. EFSEC sent out general public information notices to state and local agencies as well as the general public on their mailing list as outlined under WAC 197-11-150 Public Notice. Notices for the April 3 and 4, 2000 public comment meetings were published in:

Bellingham Herald: March 23, 2000  
Lynden Tribune: March 29, 2000  
Abbotsford News: March 23, 2000

In addition to the mailings, EFSEC posted the Draft EIS and extensions of the comment period on their Web site.

4. The Washington Administrative Code States:  
  
*“When a proposal is for a private project on a specific site, the lead agency shall be required to evaluate only the no action alternative plus other reasonable alternatives for achieving the proposal's objective on the same site.” (WAC 197-11-440 (5)d).*
5. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
6. 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.

7. The applicant has agreed to provide mitigation for any wells within one mile of the City well fields that are impaired (Adjudicative Hearing Transcript, testimony by Ms. McGaffey, pages 906-910). The Final EIS recommends that the same provision be applied to any wells in Canada or Washington that are impaired as a result of the increased pumping. The Final EIS also recommends that a baseline survey and monitoring of wells that could potentially be impacted be accomplished prior to startup of the facility so that the actual effects on wells can be documented.

Enforcement of emission limits established in the facility's operating permit would be the responsibility of the Energy Facility Site Evaluation Council and the U.S. Environmental Protection Agency.

8. Thank you for your comments.

### **198 Wendy Vossbeck**

1. Please see Letter 65, Response to Comment 1 for a discussion of greenhouse gases and potential mitigation measures as they relate to this project. Please see Letter 3, Response to Comment 2 for a discussion of potential air quality impacts in the Lower Fraser Valley.
2. The comments concerning emissions from the proposed facility are noted.
3. Please see Letter 49, Response to Comment 9 for a discussion of the toxic emissions impact assessment prepared for the proposed project.
4. Please see Letter 5, Response to Comment 8 for a discussion of acid deposition as it relates to the proposed project.
5. Please see Letter 49, Response to Comment 7 for a discussion of the potential visibility impacts associated with the proposed project.
6. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

### **199 Henry Vossbeck**

1. 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.

Additional measures to protect redtailed hawks have been included in the Final EIS for consideration by the decision maker.

2. Since the 115 kV transmission lines have been dropped from the project, only one stream crossing (Sumas Creek) would require tree removal. Sumas Creek is a small enough channel that remaining shrubs would be adequate to provide complete or nearly complete shade under the 230 kV transmission lines.
3. Thank you for your comments.
4. A detailed air quality impact assessment that included Whatcom County was prepared for the proposed project. Please see Letter 3, Response to Comment 2 for a discussion of the potential air quality impacts associated with the proposed project. The proposal to burn fuel oil would be limited to a maximum of 15 days per year, and a rolling average of 10 days per year over any ten-year period, and only when there were natural gas curtailments.
5. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

## **200 Marlene Noteboom**

1. Thank you for your comments.
2. The 115 kV transmission lines have been eliminated as an alternative. S2GF would be operated as a “merchant” plant.
3. The 115 kV transmission lines have been eliminated as an alternative.
4. Please see Response 3 to comments by Mike Kaufman (Speaker 197) for discussion of mailings and public notices produced by EFSEC for the project.
5. Thank you for your comment. The 115 kV transmission lines in Whatcom County are no longer part of the project.
6. See Letter 3, Response to Comment 4, for discussion of EMF health effects.
7. The volume of water that would be required from the City wells has been reduced somewhat, and is now less than was allocated by the City of Sumas in the Water Supply Comprehensive Plan. That document identifies the amount of water that is projected to be needed by the City and its customers for the next 20 years. This Plan indicates that the projection includes new industries. Based on these calculations, the City planned to allocate the remainder of the water available to them to this proposed plant.
8. The volume of wastewater that would be generated by S2GF has been greatly reduced by a design modification. As a result, the amount of wastewater generated would be within the volume currently contracted between the City of Abbotsford and the City of Sumas. See General Response I for further discussion.

9. Wastewater discharge leaving the S2GF would be required to meet all existing standards for public sewer systems. Prior to discharge from the JAMES Treatment Plant, the wastewater would have to comply with Canadian environmental laws.
10. See Letter 5, Response to Comment 7 for discussion of basin/berm liner.
11. Comment noted.
12. See Letter 142, Response to Comment 13 regarding MSDS sheets.
13. The exact length of time required for construction cannot be accurately predicted. The figure of 18 months given in the EIS was an estimate. The figure of 400 workers is an estimate based on peak construction activity. Fewer workers may be required at other times.
14. The proposed facility would be subject to U.S. federal requirements, not Canadian requirements. Therefore Canadian sources were not used in the analysis. However, the British Columbia Ministry of Environment, Land & Parks (MELP) evaluated the impact of the proposed facility including all emission sources in both Canada and the United States and determined that emissions attributable to the proposed facility would be less than 1 percent for all emission sources. Please see Letter 3, Response to Comment 2.
15. Ozone would not be emitted directly by the project, but Canadian concerns were raised about the potential effects on ozone episodes attributable to emissions of NO<sub>x</sub> and volatile organic compounds from the proposed project. As part of Canadian efforts to understand troposphere ozone, the MELP has conducted detailed photochemical model evaluations of ozone precursors for specific adverse episodes. The MELP evaluated ozone impacts attributable to the proposed project by adding project-related emissions to its existing emission inventory and evaluating the project's impact on ozone concentrations in the Lower Fraser Valley. Based on that modeling effort, MELP determined that emissions from the proposed project would have a slight effect on ozone episode intensity and no effect on ozone episode duration. (Exhibit 25, page 13). Also, please see Letter 3, Response to Comment 2.
16. The proposed Significant Impact Levels (SILs) have been added to Table 3.1-12 in the Final EIS.
17. Please see Letter 155, Response to Comment 7 for a discussion of regulatory requirements applicable to the proposed facility.
18. Other emission sources were included in the air quality analysis. Please see Letter 3, Response to Comment 1.
19. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

## 201 Connie Hoag

1. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
2. EFSEC reviewed and accepted the Draft EIS that was released for public comment in March 2000. The EIS has been revised to reflect comments on the Draft EIS received in writing and given at public meetings held on April 3 and 4, 2000.
3. Additional text has been added to the Final EIS indicating that during certain hours, existing sound levels at some locations exceeded sound limits established by the City of Sumas noise ordinance.

**Table B-1(a) of Appendix B:** Sound levels exceeded the 60 dBA limit (less than 1 dBA) for 2 hours during the daytime. As noted in the Application for Site Certification, a brush cutter passed by the measurement location during the 9 a.m. hour which would account for the relatively high sound level for this hour (63.7 dBA) (Exhibit 22, page 4.1-4). The 24-hour Leq at this location (54.6 dBA) did not exceed the noise limits established by the City of Sumas noise ordinance.

**Table B-1(b) of Appendix B:** With the exception of the 5 p.m. hour, sound levels did not exceed daytime limits established by the noise ordinance. During the 5 p.m. hour of this measurement session, a lawn mower was running, which would explain the high sound level during this hour (66.6 dBA) (Exhibit 22, page 4.1-4). During the nighttime hours the nighttime noise limit was exceeded during the 7 a.m. hour (51.1 dBA). The 24-hour Leq (54.5 dBA) did not exceed the noise limits established by the noise ordinance.

**Table B-2(a) of Appendix B:** During the nighttime, noise levels exceeded the nighttime limit by 0.1 dBA for 2 hours. The source of the relatively high sound level during the noon hour at this location (64.1 dBA) is unknown. The 24-hour Leq (53.9 dBA) did not exceed the noise limits established by the noise ordinance.

**Table B-2(b) of Appendix B:** There were no exceedances of the noise limits during the measurement period at this location.

**Table B-3(a) of Appendix B:** During the nighttime, noise levels exceeded the nighttime limit by 1.5 dBA during the 6 a.m. hour and by 4 dBA during the 7 a.m. hour. Traffic along Front Street and Sumas Avenue was likely responsible for the higher sound levels during these morning hours (Exhibit 22, page 4.1-6). During periods of no traffic, sound levels were much lower at night. There were no exceedances of the daytime limits. The 24-hour Leq (51.8 dBA) did not exceed the noise limits established by the noise ordinance.

**Table B-3(b) of Appendix B:** Noise levels exceeded the nighttime limit by 2 dBA during the 7 a.m. hour with traffic the most likely source of the higher sound levels. There were no exceedances of the daytime limits. The 24-hour Leq (51.7 dBA) did not exceed the noise limits established by the noise ordinance.

Because sound levels may be exceeding applicable noise limits for short periods is not an indication that overall sound levels are exceeding the established noise limits.

4. As with all noise-emitting industrial sources, it is assumed that the IKO facility would comply with noise limits established by the City's noise ordinance. The contribution of the facility to overall noise limits would add incrementally to background sound levels in Sumas. As noted in the EIS, to the extent that the IKO facility contributed to a higher background sound level, then the incremental increase in noise associated with other future industrial projects would be lower.
5. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of potential noise impacts associated with the proposed project. As noted by independent reviewers of the noise study, the study was determined to be thorough and consistent with professional standards. Measurement and analysis methodologies and mitigation approaches were appropriate for the purposes of the study. (Exhibit 92, page 2)
6. Field technicians visited the commentor's neighborhood to determine if the sounds from the existing facility were audible. With background sound levels in the low 30's dBA, the field technician could not measure or hear any noise in that area from the existing facility. It is possible, however, that the commentor has more sensitive hearing. According to the noise impact analysis, at that distance it is unlikely that the proposed project would result in a noticeable difference in noise levels. (Exhibit 154, page 24).
7. With respect to existing sound levels, please see Response 3, above. For noise mitigation measures proposed by the applicant, please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22.
8. Please see Response 4 above for a discussion concerning the IKO facility.
9. The nighttime hourly Leqs reported by the commentor are not inconsistent with those reported in Appendix B of the Draft EIS for the nighttime hours. The Leq(24) of 53.9 dBA noted by the commentor is the average sound level at the measurement location over a 24-hour period. The hourly Leqs ranging from 39 to 52 dBA were Leqs for individual hours. When all 24 one-hour Leqs are totalled, the resulting overall average sound level is the Leq(24), 53.9 dBA in this instance. The A-weighted sound levels reported by the Whatcom County noise analyst are not inconsistent with those reported in Appendix B of the Draft EIS.
10. Table 3.3-7 shows the existing Leq(24) at each of the measurement locations. Existing sound levels (without the project) at the measurement locations ranged from 51.7 dBA to 54.5 dBA. Noise levels attributable to the proposed project (shown as S2GF Leq(24) in Table 3.3-7 of the Draft EIS) range from 47 dBA to 49 dBA. When the existing sound level is logarithmically added to the sound levels expected from the project, the combined sound levels range from 53.0 dBA to 55.8 dBA. The increase in overall sound levels attributable to the project is 0.9 dBA to 2.0 dBA, depending on location. A 2 dBA

difference in sound levels is not distinguishable to the average listener.

The commentor's reference to the 50 dBA noise limit is for nighttime hours (10 p.m. to 7 a.m.) when sound levels from an industrially-zoned project cannot exceed 50 dBA at a residential property. As discussed in Response 3, above, the proposed project generally meets the nighttime noise limits and the applicant has agreed to meeting the noise limits established by the City of Sumas noise ordinance. As discussed in the Draft EIS, the EPA has no regulatory authority over noise. Please also see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for additional discussions concerning the potential noise impacts attributable to the proposed project.

11. Please see Letter 3, Response to Comment 1 for a discussion of air quality standards as they relate to human health considerations.
12. The emissions associated with the proposed facility would not result in violations of the applicable regulatory standards by which the significance of air emissions is evaluated. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts associated with the proposed project.
13. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts in Canada.
14. Formaldehyde emissions were evaluated as part of the toxic air pollutant impact analysis for the proposed project (please see Table 3.1-14 of the Draft EIS) and annual emissions were predicted to be less than the applicable regulatory standard.
15. Chromium 6 emissions were evaluated as part of the toxic air pollutant impact analysis for the proposed project (please see Table 3.1-14 of the Draft EIS) and annual emissions were predicted to be less than the applicable regulatory standard.
16. Chromium 6 was evaluated in the air quality impact assessment (see Response 15 above).
17. As noted in the EIS, the small amount of sludge that will be formed in the cooling tower is not expected to be designated as a dangerous waste under state regulations. If the sludge is determined to be toxic/hazardous, it will be disposed of in accordance with applicable state and federal regulations.

Solids derived from the cooling tower blowdown water are primarily the constituents that occur naturally in the groundwater. Based on a list of the constituents in the wastewater from SE1 (provided in the Application for Site Certification, Section 2.8) it is unlikely that this residual material would be a hazardous waste. In the event that it is hazardous, however, it would have to be disposed at a permitted treatment/disposal facility.

18. As shown in Table 3.1-9 of the Draft EIS, estimated emissions from the IKO facility were considered as an increment consuming industrial source in the air quality impact analysis.

19. Table 6.1-4 of the revised Application for Site Certification (January 2000) lists 13 toxic pollutants under gas firing conditions and 18 under oil firing conditions. These tables are repeated in the EIS.
20. The 115 kV transmission lines have been eliminated as an alternative.
21. The 115 kV transmission lines have been eliminated as an alternative.
22. As indicated in Chapter 1 of the EIS, the S2GF would be a “merchant” plant. Thus, the power produced by the facility would be sold wherever there is a market. Puget Sound Energy would not be obligated to purchase power from the S2GF.
23. Please see General Response A.
24. Please see General Response D.
25. The 115 kV transmission lines have been eliminated as an alternative.
26. Thank you for your comments.
27. Please see Letter 5, Response to Comment 8 for a discussion of acid deposition as it relates to the proposed project.

A tributary to Johnson Creek would receive only stormwater from the SE2 site. No industrial process water would be discharged to surface waters. The stormwater control system would be described in detail in a stormwater management plan that would have to be approved by EFSEC and be available to Ecology and WDFW for comment before approval.

28. Thank you for your comments.

## **202 Fred Hoekstra**

1. Please see Letter 3, Response to Comment 2 for a detailed discussion of air quality impacts in Canada.
2. The incremental air quality impacts of the proposed project are discussed in Letter 3, Response to Comment 2.
3. Please see General Response B for discussion of power lines in Canada. See Letter 3, Response to Comment 4 for discussion of EMF health effects.
4. See Letter 3, Response to Comment 4 for discussion of EMF health effects.
5. Please see Response 3 to comments by Mike Kaufman (Speaker 197) for discussion of mailings and public notices produced by EFSEC for the project.

6. See Response 3 above regarding impacts of power lines.

### **203 Elerine Shields**

1. Please see Response 3 to comments by Mike Kaufman (Speaker 197) for discussion of mailings and public notices produced by EFSEC for the project.
2. Thank you for your comment.
3. Please see Letter 3, Response to Comment 1.
4. Please see Response 1 above.
5. Construction of the proposed plant would occur on existing agricultural lands. As discussed in the EIS, the loss of vegetation would be associated with the grasses and weeds that occupy the site when the land is fallow, or corn when it is farmed. There would be no expected loss of trees at the proposed plant site. However, impacts on the farmed wetlands would occur from plant construction. As explained in Exhibit JW-4 of the Supplemental Settlement Agreement Between Washington Department of Fish and Wildlife and Sumas Energy 2 Regarding Wetlands dated July 17, 2000 (see Volume 1, Appendix G), wetlands would be created and enhanced to compensate for the farmed wetlands filled by the construction of the proposed plant. This wetland creation and enhancement would occur on the land immediately adjacent to the proposed plant site. Trees that are tolerant of growing in wetland conditions, such as western red cedar, would be planted in the existing wetland and in other wetlands to increase the number of trees in the area.

To provide further clarification, the two 115 kV electrical transmission line options are no longer part of the proposed action. Therefore, any tree removal or potential wetland impacts associated with these transmission line options are not included in the Final EIS.

6. The 115 kV transmission lines have been eliminated as alternative.
7. Thank you for your comment.
8. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

### **204 Ronna Loerch**

1. Thank you for your comments.
2. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

3. The sound level guidance was prepared in 1974 and is meant as a source of information. The noise impacts of the proposed project are based on criteria established in the City of Sumas noise ordinance.
4. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
5. The cumulative noise impacts were addressed. Please see Section 3.3.6 of the Draft EIS and Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22.

## **205 Mary Petty**

1. It is unlikely that sound levels from the existing facility would be discernable at a distance of 12 to 15 miles from the existing facility, especially with attenuation due to topography, vegetation, and screening from intervening buildings. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22.
2. The 115 kV transmission lines have been eliminated as an alternative.
3. The comments concerning carbon dioxide and nutrient impacts on plants are noted. We are unaware of scientific studies documenting the effects suggested in this comment.
4. 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. General Response B discusses power line impacts in Canada.

## **206 Dirk Petty**

1. Please see Letter 3, Response to Comment 2 for a discussion of the air quality impact assessment prepared for the proposed project. Section 3.1.4.2, Air Emission Impacts in Canada, addresses potential health impacts due to PM10 and ozone in the Fraser Valley.
2. Please see General Responses D, I and J which address concerns over water use, impacts to wells, wastewater discharge, and flood impacts.
3. See Letter 142, Response to Comment 9 for discussion of conservation.
4. S2GF would be a “merchant” plant. Thus, power may be sold to buyers outside the Northwest. However, S2GF may also supply power to the immediate area as well. This would depend on the load-resource balance and contractual commitments at any given time.
5. Comment noted.
6. See Letter 3, Response to Comment 4 for discussion of EMF health effects.

7. See Letter 3, Response to Comment 4 for discussion of EMF health effects.
8. Thank you for your comments.
9. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.

## **207 Cal Leenstra**

1. 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.
2. 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.
3. Jones & Stokes is the environmental consultant for EFSEC. Jones & Stokes independently reviewed data provided by the applicant's consultant, Dames & Moore, and was responsible for preparing the EIS.
4. Thank you for your comment. Please see Response to Comment 1 above.
5. Thank you for your comment. Please see Response to Comment 1 above.
6. Thank you for your comments.
7. Please see Response to Comment 1 above.

## **208 Paul Vautaux**

1. Copies of the Draft EIS were distributed to numerous federal, state, local, and tribal agencies in the United States, including Whatcom County libraries, as well as Canadian government entities. The EIS was also posted on the EFSEC website.
2. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
3. As indicated in Section 5.2.2.1 of the Application for Site Certification, construction planning has not identified a need to transport construction materials by rail. However, large primary components of the facility could require rail transport. Such transport is anticipated to be minor and the transfer of components to trucks for delivery to the site would occur at existing adjacent local rail spurs. A crane would be used to off-load equipment from the rail cars and onto trucks for transport to the site.

Operation of the facility would not require rail transport except for the rare need to

replace a major piece of equipment. The centerline of the track is more than 250 feet to the nearest site property line.

4. The 115 kV power lines are no longer part of the project.
5. The two 115 kV electrical transmission line options are no longer part of the proposed action. Therefore, trees in the Dewey Valley would not be affected by the proposed action.

Footnote 3 in Table C-3 identifies those wetlands that were not included in the Black and Veatch 1999 report, but were identified in the field studies conducted by Dames & Moore in 1999. Therefore, these wetlands were included in the impact analysis in the Draft EIS.

6. Please see the response to Mr. Vautaux's comment number 5 regarding the impacts associated with maintaining the 115kV electrical transmission lines.
7. In response to public and agency comments, discussion of impacts in Canada has been added in several sections of this Final EIS.
8. Please see Response to Comment 2 above.
9. Thank you for your comments.

## **209 Candace Ambrosio**

1. See Letter 142, Response 9, for discussion of conservation.
2. Discussion of Canadian impacts has been added in several sections of the Final EIS.
3. Thank you for your comments.
4. S2GF will be operated as a "merchant" plant. Thus, power could be sold to purchasers within and outside the Northwest region. The need for power is a complex subject and is addressed in several documents (e.g., Washington State Electricity System Study, Exhibit 28.4; 1999 Biennial Energy Report, Exhibit 28.3; Northwest Power Supply Adequacy/Reliability Study Phase I Report, Exhibit 42.2).
5. Thank you for your comments.
6. The 115 kV power lines in Whatcom County are no longer part of the project.
7. Please see Response to Comment 5 by Darryl Ehlers (Speaker 187) for discussion of extending the Draft EIS comment period.
8. See Letter 142, Response to Comment 9 for discussion of conservation.

9. Thank you for your comments.

## **210 Darlyn DeIBoca**

1. The fill material for construction of the plant would be obtained from existing, permitted gravel pits. The environmental impacts of that mining would be addressed in the permitting process for the gravel extraction, and not under EFSEC jurisdiction.
2. Water resource issues are discussed in General Responses D and E.
3. Please see Letter 3, Response to Comments 1 and 2 for a discussion of regulatory standards and Letter 5, Response to Comment 8 for a discussion of deposition impacts associated with the proposed facility.
4. Comments regarding eagle habitat are noted. Letter 3, Response to Comment 4 discusses health effects of power lines.
5. Sand and gravel used for the fill pad at S2GF would come from existing, permitted gravel pits. Environmental impacts associated with the gravel source would be addressed as part of the permitting process for the gravel pit.
6. 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.

## **211 Barbara Brenner**

1. The comments concerning the existing facility are noted.
2. Thank you for your comments.
3. It is not clear what the commentor is asking in this question. We suspect this question refers to the previous intent of S2GF to obtain water from Canada. We are not aware of the reason Abbotsford decided not to provide water for this facility. However, the volume of water that was needed based on the former project design was much greater than is now needed. Please see General Responses for further discussion.

Air quality is discussed in detail in the responses to Letter 3. Greenhouse gases are discussed in the responses to Letter 150.

4. 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.

5. Thank you for your comments.
6. Please see Letter 9, Response to Comment 5 for a discussion of the BACT-determination process.
7. Greenhouse gases are discussed in the responses to Letter 150.

**212 Mary Petty**

1. See Letter 69, Response to Comment 7 for discussion of location of S2GF vs. load.