

**Responses to Comments Presented at Public Hearing
Held in Sumas on April 4, 2000**

213 David Davidson

1. Please see response to Letter 4, Comment to Comment 2.
2. Thank you for your comments.
3. Thank you for your comments.
4. Thank you for your comments.
5. Thank you for your comments.
6. The original comment period for the Draft EIS was to have ended on April 17, 2000, which was 30 days after publication of the Draft EIS. Prior to and during the public comment meetings on April 3 and 4, 2000 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, on April 6, extended the comment period 15 days to May 2, 2000.

214 Rich VanDeis

1. Every effort has been made to address these complex issues in the Final EIS as clearly as possible.

215 Bo Bumford

1. Air quality issues are discussed in the responses to comments in Letter 3. General Responses D through J address water resource issues.
2. Thank you for your comment. Please see General Response A for discussion of costs and benefits of the project.
3. Thank you for your comment.

216 Laurie Hoekstra

1. The air quality analysis was based on data from the Abbotsford monitoring station because it is the closest station to the proposed project site. The Chilliwack and Hope stations are approximately 20 miles and 50 miles east of Abbotsford, respectively. Following publication of the Draft EIS, air quality monitoring data from Chilliwack and Hope were evaluated and compared with the monitoring data from Abbotsford used in the air quality analyses. For the same time frames (1996 through 1999) and for the same constituents (NO₂, CO, PM₁₀, and ozone), the existing air contaminant concentrations in Chilliwack and Hope were less than or equal to those reported in Abbotsford (Letter from David Weeks to Allan Fiksdal, Sumas Energy 2 – PSD Hearing Bench Request, October 16, 2000). Therefore, the data used in analyses were more representative of local conditions than would have been the data from either Chilliwack or Hope. In addition, since the ambient concentrations were higher at the Abbotsford station, the impact analyses were worst-case with respect to the incremental impact of the proposed project.
2. Thank you for your comment. Please see General Response B.

Please see General Response I, which describes a significant reduction in the wastewater discharge requirements of the S2GF project. In effect, no change would be made to the existing contractual agreement between the City of Abbotsford and the City of Sumas for sewage treatment and disposal.

217 Robert Loch

1. Thank you for your comments.
2. 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.

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. The 115 kV transmission lines have been eliminated as an alternative. Thus, all power from the project would enter the transmission grid via the 230 kV transmission line to Canada.
4. See Letter 134, Response to Comment 8.
5. The decision to use fuel oil as a backup is one made by the applicant. The air quality impact assessment indicated that emissions from the firing of fuel oil for a maximum of 15 days per year would be a relatively minor source of emissions. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts, including those in the Lower Fraser Valley. Since publication of the Draft EIS the applicant has further agreed to limit the number of days of fuel-oil firing to an average of 10 days per year based on a 10-year rolling average (Exhibit 162.13, page 2). The incremental air quality impacts associated with fuel-oil firing would be less than those reported in the Draft EIS.
6. Thank you for your comments.

218 Daniel Girod

1. Thank you for your comments.
2. The complexity of the project requires a detailed analysis in many areas. It is not possible to accurately assess impacts using a one-to-one comparison with the existing plant.

219 Robert Bos

1. Please see Letter 3, Response to Comment 2 for a discussion of potential air quality impacts in Canada resulting from the proposed project.
2. S2GF would be operated as a “merchant” plant. Thus, power could be sold to customers in Canada as well as in the United States.

220 Robert Riedlinger

1. See Letter 3, Response to Comment 4, for discussion of EMF health effects.

221 Irwin Noteboom

1. Please see Letter 65, Response to Comment 1 for a discussion of greenhouse gas mitigation measures proposed by the applicant for this project.
2. As described in General Response I, the cooling system has been revised to recycle water at the plant, resulting in less water consumption, nearly an order of magnitude reduction in wastewater discharge, and some reduction in the total dissolved solids present in the discharged water, since this material would be removed in the recycling process. The wastewater discharge leaving the plant would have to meet standards for public sewer discharge and would be treated at the JAMES plant to comply with Canadian environmental law prior to release to the Fraser River.
3. 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. Safety and property value impacts related to the 115 kV lines are no longer an issue for the project.
4. See Response 3 above.
5. See Response 3 above.
6. See Response 3 above.
7. See Response 3 above.

222 Patricia Ross

1. As noted in Letter 3, Response to Comment 2, detailed air quality modeling indicated that the proposed project would comply with both EPA and Canadian air quality objectives for all criteria pollutants. In addition, a review of the air quality impact assessment prepared by technical staff from the British Columbia Ministry of the Environment, Land, and Parks (MELP) concluded that the proposed project would not cause the most stringent Canadian air quality objectives or standards to be further exceeded.

With respect to PM_{2.5}, the recently promulgated (June 2000) Canada Wide Standard for PM_{2.5} is 30 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) using the 24-hour average, annual 98th percentile averaged over 3 years. Analyses conducted by MELP air quality technical staff and based on Chilliwack, British Columbia, data show that since 1995 the PM_{2.5} Canada Wide Standard has not exceeded 18.2 $\mu\text{g}/\text{m}^3$. Assuming that PM₁₀ emissions from the proposed facility are 100 percent PM_{2.5}, and given a maximum predicted impact of 7.4 $\mu\text{g}/\text{m}^3$ due to the proposed project, a conservative estimate of the total PM_{2.5} concentration would be 26 $\mu\text{g}/\text{m}^3$, or less than the proposed Canada Wide Standard. Since not all particulate emissions from the proposed facility would be PM_{2.5}, this represents a conservative, worst-case scenario for PM_{2.5} emissions.

The British Columbia MELP concluded that emissions from the proposed facility would not exceed the Canada Wide Standard if existing ambient concentrations of PM2.5 remain similar to historical levels (Volume 1, Appendix K, pages 22 and 23).

2. The proposed facility would be required to operate at emission levels specified in its operating permit. It is not expected that emissions would increase with age of the facility.

223 Andrea Mikulan

1. See Letter 3, Response to Comment 4, for discussion of EMF health effects.
2. Thank you for your comment. Please see General response B.
3. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts in Canada.

224 Dave Wilson

1. Thank you for your comments.
2. Please see Response 2 to comments by Robert Loch (Speaker 217) for discussion of mailings and public notices produced by EFSEC for the project.
3. Please see responses to comments in Letter 3 for air quality information.
4. Real property values of the transmission ROWs are not likely to change since the 230 kV line would be located in industrial and commercial areas within existing utility and railroad ROWs.

225 Noni McGuire

1. Please see Response 2 to comments by Robert Loch (Speaker 217) for discussion of mailings and public notices produced by EFSEC for the project.
2. The transmission line should not present a problem to the steel plant.
3. Please see Letter 3, Response to Comment 2 for a discussion of air impacts in Canada.
4. Please see General Response J for discussion of flooding.

5. Impacts on eagles were addressed in the EIS. Air quality emissions from this proposed facility would not significantly affect bald eagles or other wildlife.
6. Thank you for your comments.

226 Darryl Ehlers

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 two 115 kV electrical transmission line options are no longer part of the proposed action. Therefore, the trees in Mr. Ehlers' farm park would not be affected by the proposed action.
3. Thank you for your comments.
4. The applicant has agreed to mitigation of impaired wells within a mile of the Sumas municipal well field on the U.S side of the border. This distance corresponds to the theoretical radius at which their hydrogeological consultant calculated a foot of drawdown as a result of pumping from the City's well fields. Please see General Response D for more information about the potential for such an impact and the proposed mitigation measures.
5. Please see General Response D for a discussion of the potential impact from withdrawal of groundwater to supply this project. 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, has indicated that the plant would bring needed economic growth and jobs, tax revenue, and a market for unused groundwater. 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 I for further discussion of the revised approach to wastewater disposal.
6. The 115 kV transmission lines have been eliminated as an alternative.
7. Chromium 6 was evaluated as part of the toxic pollutant assessment for the proposed project. Expected emissions from the proposed facility were much less than established regulatory limits. Please see Letter 49, Response to Comment 9 for a discussion of toxic pollutant impacts associated with the proposed facility.
8. Please see Response 6 to comments by David Davidson (Speaker 213) for discussion of extending the Draft EIS comment period.

227 Paul DeBruyn

1. Please see responses to comments in letter 149.
2. Please see responses to comments in letter 149.
3. Please see responses to comments in letter 149.
4. Please see responses to comments in letter 149.
5. Please see responses to comments in letter 149.

228 Ronna Lurch

1. Thank you for your comments.
2. According to the Washington Administrative Code:

When a proposal is for a private project on a specific site, the lead agency (EFSEC) shall be required to evaluate only the no action alternative plus other reasonable alternatives for achieving the proposals objective on the same site. (WAC 197-11-440 (5)d).
3. The comment concerning the use of standards is noted, however the applicable regulatory standards are those which the proposed facility would be required to comply with. It is beyond the scope of this EIS to develop alternative impact criteria.
4. The incremental impacts of the proposed facility were addressed in the Draft EIS and were found to be below the applicable standards that would apply to this facility. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts associated with the proposed facility.
5. The air quality impact analysis included estimated emissions associated with the IKO facility (see Table 3.1-9 of the Draft EIS, Increment Consuming Industrial Sources within 20 km of S2GF Site).
6. Thank you for your comments.
7. Thank you for your comments.
8. Thank you for your comments.
9. Please see Response 6 to comments by David Davidson (Speaker 213) for discussion of extending the Draft EIS comment period.

229 Paul Vautaux

1. Thank you for your comments.
2. Thank you for your comments.
3. Thank you for your comments.
4. All documents received by EFSEC during the review of the application are public records and are available for inspection at the Council offices in Olympia.
5. Thank you for your comments.
6. Please see Response 2 to comments by Robert Loch (Speaker 217) for discussion of mailings and public notices produced by EFSEC for the project.
7. Please see Response 6 to comments by David Davidson (Speaker 213) for discussion of extending the Draft EIS comment period.

230 Mike Kaufman

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. See Response to Comment 1 above.
3. The 115 kV transmission lines have been eliminated as an alternative.
4. See Letter 162, Response to Comment 1, for discussion of use of BPA's transmission facilities.
5. The proposed S2GF is not unique. Combustion turbine generating facilities are widely used throughout the United States. Puget Sound Energy, for example, owns and operates several dual-fuel combustion turbines in western Washington.
6. See Response to Comment 1 above.
7. Please see Letter 152, Response to Comment 7 for discussion of infrastructure.
8. The majority of the site (27.5 acres) is idle cropland that has produced corn and possibly other crops. It is not practical to predict what agricultural revenue might result if the site were to be farmed in the future, because this would depend on many factors including the crops being grown, the market value of the crops, and the demand for the crops.

The results of not building the project (that is, implementing the No Action Alternative) were described in the DEIS for each resource in Chapter 3.

9. The two 115 kV electrical transmission line options are no longer part of the proposed action. Therefore, trees and associated habitat on DNR land along Zell Road would not be affected by the proposed action.
10. EFSEC retained Jones & Stokes as the independent environmental consultant for this project. Jones & Stokes is not under contract to the applicant. Public notification procedures are discussed in Letter 152, Response to Comment 1, and in Response 2 to comments by Robert Loch (Speaker 217).
11. EFSEC reviewed and accepted the Draft EIS and released it for public comment in March 2000. The Final EIS includes revisions to reflect written comments and comments given at public meetings held on April 3 and 4, 2000.
12. Thank you for your comments.

231 Brian Frankish

1. Please see General Response B for discussion of power line impacts in Canada. The 115 kV lines are no longer part of the proposed project.
2. Please see General Response I for a discussion of a significant revision to the approach for disposal and volume of wastewater discharge. Please note the Draft EIS indicates on pages 2-12, 2-29, and 2-30 that the wastewater would be sent to Canada for treatment. This would be true under the revised approach, although there would be significantly less wastewater discharge as described in the Final EIS.
3. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts in Canada.
4. As discussed in the EIS, it is anticipated that at peak load, up to four trucks per hour would be required to replenish the fuel supply once the storage tank has initially been filled.
5. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts in Canada.
6. The comment is noted. The noise impacts associated with a new facility in Abbotsford are beyond the scope of this EIS.
7. See Letter 107, Response to Comment 26.
8. Thank you for your comments.

232 Dirk Petty

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. Thank you for your response. The 115 kV power lines in Whatcom County are no longer part of the project. Please see General Response B for Canadian transmission line impacts.
3. Please see Response to Comment 2 above.

233 Brian Kunimoto

1. Please see Letter 3, Response to Comment 2 for a discussion of human health considerations in establishing air quality standards.
2. Thank you for your comments.

234 Elerine Shields

1. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts associated with the proposed facility.
2. Please see Letter 49, Response to Comment 9 for a discussion of toxic air contaminant impacts associated with the proposed facility.
3. Please see Response 2 to comments by Robert Loch (Speaker 217) for discussion of mailings and public notices produced by EFSEC for the project.
4. Please see Response 2 to comments by Robert Loch (Speaker 217) for discussion of mailings and public notices produced by EFSEC for the project.
5. The 115 kV transmission lines in Whatcom County are no longer part of the project.
6. Please see Letter 49, Response to Comment 9 for a discussion of toxic air contaminant impacts associated with the proposed facility.
7. See General Response C for discussion of wetland impacts and mitigation.
8. Please see Response 6 to comments by David Davidson (Speaker 213) for discussion of extending the Draft EIS comment period.
9. Thank you for your comments.

235 Connie Hoag

1. Volume 1, Appendix H contains the letter from Governor Locke vetoing the proposed tax package.
2. With respect to the human health implications of the air quality standards, please see Letter 3, Response to Comment 1.
3. With respect to new or revised air quality standards, please see Letter 155, Response to Comment 7.
4. Please see Public Hearing Comment 201, Responses to Comment 3 through 10, as well as Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts associated with the proposed facility.
5. 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 Draft 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.
6. See Letter 5, Response to Comment 6.
7. Please see Letter 156, Response to Comment 18.
8. With respect to toxic air pollutants associated with the proposed facility, please see Letter 161, Response to Comment 4.