

Responses to Comments in Letter CL1 from Patricia Ross, City of Abbotsford

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

- 1-2. Comments acknowledged.
3. Note that after the Draft SEIS was published, SE2 updated the specific provisions of its proposed greenhouse gas mitigation program. The updated program would provide less funding than was indicated in the Draft SEIS. Section 3.1 has been revised to address the updated proposal. In addition, Section 3.1 has been revised to compare SE2's proposed mitigation program to other greenhouse gas offset programs that currently operate in the region.
4. Section 3.1 of the FEIS has been revised to reflect a higher estimate of actual CO₂ offset costs. The revised estimate indicates a lower fraction of actual CO₂ emissions eliminated based on SE2's fund.
5. In addition to an offer of \$25,000 per year to assist the city of Sumas in measures to protect the aquifer, the applicant has also agreed to purchase a treatment system to reduce nitrate concentrations in city water if nitrate concentrations exceed drinking water standards after the S2GF is in operation. These measures would be taken by the applicant regardless of whether or not the plant would contribute to migration of nitrate contamination to the city's water supply wells.
6. The Draft SEIS, and the February 2001 FEIS prepared for this project summarize wetland mitigation as proposed in the wetland mitigation plan (Bexar 2000). This document provides greater detail on the mitigation approach and monitoring program. The mitigation plan was attached as Appendix G of the FEIS. The Draft SEIS acknowledges the applicant should provide additional detail regarding contingency measures. The SEIS has been revised to state the applicant would develop a monitoring plan describing monitoring methods and contingency measures if the mitigation does not meet the expected performance standards. This monitoring plan would be prepared using guidance from publications available from the Washington State Department of Ecology.
7. The delay in completing unsteady-state modeling can be attributed to a few factors. First, the original and revised ASCs relied upon existing steady-state modeling to predict the impact that construction of the facility would have on flooding. Precedents for relying on a steady-state model included its use by the city of Sumas on previous projects in the immediate vicinity, and its use as by FEMA for flood insurance mapping. While hydrologists retained by the city and the applicant believe that the modeling that was performed is appropriate and adequate for evaluating impacts from flooding, Whatcom County has been developing an unsteady-state model that Ms. Paula Cooper, a hydrologist with the County, believes would provide a more reliable assessment of the

flood impact, particularly for flood smaller than the 100-year event. However, at the time she raised this issue (during the adjudicative hearings held in 2000), the model was not sufficiently developed for use in evaluating the impact of placement of fill for the site. Since the Second Revised ASC was submitted, the applicant has been coordinating with Ms. Cooper to further develop the model and to apply it to this project. This process has been time consuming in part because the model is a state-of-the-art tool that requires considerable fine tuning to simulate the conditions of the floodplain and site, and in part because it requires very long run times (on the order of weeks) to obtain meaningful output.

The mitigation measures that the applicant would propose would likely be physical changes in the landscape to compensate for loss of flood storage or flow restriction. The intent would be to prevent damage rather than to compensate after an impact had occurred.

8. The applicant has always planned to develop a seismic design for the facility that would comply with national and local seismic design criteria. Thus, the concern over seismic safety is not new, but is a requisite of building such a facility in the Pacific Northwest. Because of the demonstrated adequacy of such design criteria to mitigate seismic hazards typical of the area and region, it was not considered necessary for the supporting investigations to be conducted in advance in order to evaluate the environmental impacts of seismic hazards to the facility. The potential for active faulting at the site is a new consideration that was recently raised. No published or unpublished evidence is available that indicates the presence of an active fault at or near the site. Nevertheless, this hypothesis will be evaluated and considered in the seismic design of the facility.
9. Comment acknowledged.