Responses to Comments in Letter CR1 from Les and Joan Hay, Canadian Residents

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 volume of wastewater that would be generated by the S2GF has been substantially reduced from that proposed in the FEIS, and is within the quantities already contracted between the city of Abbotsford and the city of Sumas. The wastewater from the facility would include cooling tower blowdown, reverse osmosis reject steam, demineralizer waste, polisher waste, and office/plant employee domestic waste. Based on the anticipated quality of these waste streams, all waste would comply with the city of Abbotsford Industrial Waste By-Law, No. 300-96, which is a requirement of the city of Sumas' wastewater agreement with the Fraser Valley Regional District and the city of Abbotsford.

2. Comment acknowledged.

3. Section 3.1 has been revised to describe the types of greenhouse gas offset programs that could be implemented and to clarify that greenhouse gas offset programs anywhere in the world would benefit citizens in Washington and Canada.

4. The SEIS has been revised to clarify that the groundwater monitoring and any necessary mitigation of private or commercial wells would apply to wells in both Washington and Canada. The monitoring that is proposed by the applicant would be sufficient to determine what impact the additional extractions would have on local wells. It is expected that any adverse changes resulting from project-specific groundwater use would occur fairly rapidly.

5. The 1-mile radius is a theoretical area of interference that is conservatively estimated from pumping test data and a general understanding of the hydrogeology of the aquifer. The applicant has indicated that it would perform additional testing to better determine the actual area of interference and provide monitoring as appropriate to evaluate impacts of any drawdown resulting from well interference.

   Whereas EFSEC does not have any jurisdiction in Canada, it does hold licensing authority over the S2GF project. The groundwater monitoring and mitigation would be a condition of the license, and EFSEC would review the results of the monitoring and any proposed mitigation.

6. Comment acknowledged.

7. Section 3.4 has been revised to describe specific mitigations that are recommended to be required as part of the certification process and/or prior to startup of the plant.

8. There are no proposed project facilities that would be constructed in Canada. Therefore, no direct impacts from construction or maintenance of facilities would occur on wetlands in Canada. Indirect impacts from groundwater use would not be expected to affect wetlands near the S2GF site as discussed in the FEIS for this project. The purpose of the evaluation of wetlands mitigation (See Section 3.5.4 of the Final SEIS) is to determine the adequacy of mitigation of direct loss of wetlands on the proposed site.

   The plant would be licensed based on the application submitted by SE2. Any future proposed changes would have to undergo an environmental review and regulatory process. The 1,000-gallon diesel tank would be used to provide fuel for a backup diesel-powered fire pump, which would be used in the event of a loss of electricity during a fire.

9. Mitigation for flood control has been further defined in the SEIS.

10. Earthquake-sensitive structures at the plant and associated with the plant would be designed to withstand a Probable Maximum Earthquake in keeping with the most rigorous national and state building codes. These codes were developed to be protective of human health and property. Consequently, hazards to humans on site would be expected to be minimal, similar to those associated with any industrial facility that was properly designed and where employees were trained in workplace health and safety. Off-site hazards to humans or property would not be expected.