

Responses to Comments in Letter CR5 from James Degen, Canadian 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 unsteady-state flood modeling that has been proposed by the applicant has not been completed, and its results are not available for inclusion in the SEIS. However, the applicant has agreed to complete the unsteady-state modeling for the 100-year flood as well as for smaller floods and to propose reasonable mitigation measures, if needed, based on that modeling as part of the project design. Nevertheless, it should be recognized that applicable flood modeling has been performed for the area, which provides an estimate of the flood impact that would result from construction of this facility. In the view of some experts, the modeling that has been done is sufficient to characterize the 100-year flood at the project site. The completed modeling indicates that the effect the fill placement for the plant site flooding would be localized (see Section 3.6.1 of this SEIS for a discussion of flood level impacts). Other experts maintain that a more sophisticated unsteady-state model would provide a more reliable estimate of flooding because it would take into consideration changes in floodplain conveyance and storage. It is expected that the unsteady-state modeling will provide similar results to the existing modeling for the 100-year flood, but also will provide information on the impact of the facility on smaller floods.
2. Wetland mitigation (preservation, enhancement, and creation) is proposed to occur on floodplain soils and at elevations where wetlands have historically occurred. Establishing wetland mitigation areas on these types of soils, landscapes, and elevations creates the most likely opportunity for successful wetland mitigation. The wetland mitigation site as presented in the Draft SEIS occurs within portions of the 100-year floodplain of the Sumas River and Johnson Creek as identified in a flood insurance study completed in 1984 by FEMA (see Section 3.6 of the Draft SEIS, Flooding Potential). The Final SEIS clarifies that the applicant would be required to monitor and maintain the wetland mitigation site to ensure it establishes wetland plant communities as described in the mitigation plans prepared for the project.
3. Please see responses to Comments 1 and 2.