

## Responses to Comments in Letter USR12 from Bo Bumford, United States 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. Natural gas combustion generates much less CO<sub>2</sub> than oil combustion per kilowatt-hour of energy produced.  
  
If a thermal power plant is constructed, payments to outside parties to develop greenhouse gas offsets have been accepted as a valid method to reduce global environmental impacts. Section 3.1 has been revised to describe examples 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. However, Section 3.1 has also been revised to describe why SE2's proposed offset program would be considerably less effective than other similar programs operating in the region.
2. The proposed mitigation measures for groundwater quality would benefit all users of the city water supply if the city's wells were to become contaminated. It should be noted that nitrates are currently in the groundwater, primarily as a result of agricultural practices by a large number of concerns; the S2GF would not contribute to that contamination. With regard to groundwater quantity, the proposed mitigation measures would address any impacts to wells that were found to be affected by the increased withdrawal of groundwater for the facility. Based on hydrogeologic studies, the only wells that would potentially be affected would be those located within about a mile of the city's well fields, although this would be reevaluated based on additional testing and monitoring.
3. The Final SEIS recommends that as part of the post-startup compliance monitoring, SE2 must measure noise levels at numerous dwellings representing lowland and upland homes in Washington and Canada.
4. The flood modeling performed to date indicates that the impact on flooding as a result of filling in the entire industrial area (rather than just this proposed site for the S2GF) would result in relatively minor and local changes in the depth of the 100-year flood. The impact from this facility alone on flood levels would clearly be less than that from a larger area. The modeling that has been used in evaluating flood impacts is considered to be sufficiently reliable to meet FEMA standards. However, in response to concerns expressed by Whatcom County during the adjudicative hearings, the applicant has agreed to perform unsteady-state flood modeling of the 100-year flood as well as several smaller flood events. The applicant has also agreed that it would use that model to evaluate off-site impacts that would result from construction of the facility and propose any reasonable mitigation measures that would be required.
5. Comment acknowledged.