

SE2 SEIS/ Oct/16

To: Washington State Energy Facility Site Evaluation Council OCT 18 2001
Re: Sumas Energy 2, revised proposal

ENERGY FACILITY SITE EVALUATION COUNCIL

Thank you for this providing this opportunity and for the respect you have shown thus far for the concerns and opinions of Canadians who will be significantly impacted.

As I read the EIS, two underlying themes emerged. First, in many sections, it was pointed out that more information was needed, or that there was something "not known" or information "not readily predictable" or "no analysis of effectiveness" offered by SE2. Also, that "SE2 did not provide results." How can one properly evaluate whether a proposal is appropriate if there is so much unknown and if the proponent does not even provide needed information? But this has been their history - to provide only the information they want others to see at first and only additional information if forced to provide it. I've learned that it is what they DON'T say that we should look most carefully at.

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The other theme that emerged was that they would "provide modeling, design criteria, establish a plan, investigate or provide information" **"prior to construction."** This is completely unacceptable. All of this information should be required to be provided before certification is evaluated.

This hesitancy to provide information and guarantees is suspicious enough to be reason to deny it. If there is any risk at all, the answer should be no. Particularly since as it says in chapter one "the combined output potential of all proposed facilities far exceeds any forecast demand," so the urgency isn't there. Not to mention the fact that SE2 argued against building within 5 years anyway in previous EFSEC hearings. We've gotten into so much trouble throughout history by going ahead with things without fully investigating known risks, or even though something was uncertain and know it was a risk, gone ahead with it because some body of approval decided the risk was acceptable, or that everything would be okay. Thalydimide and DDT come to mind.

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I am particularly concerned about the greenhouse gas emissions and the offer to participate in the Oregon Energy Facility Siting Council "monetary path program." They will not actually be achieving a higher standard, but buying their way into polluting our airshed by contributing to a state that will not even experience the effects.

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There is nothing in this document to show how this fund will be used and who will get the benefits of this fund and it seems highly unlikely that those of us in Canada who will experience most of the negative effects will see it.

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Another question to ask is whether there is a mechanism in place to guarantee this amount of \$8.44 million before approval from EFSEC. This amount is based on only 30 years of operation and considering the size and amount invested, I believe it will be in operation far longer. Also, if facilities in Oregon are required to pay the sum immediately upon certification, why are the rules being bent for SE2 to pay in 5 installments and what is the penalty if they cease payments?

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The current and former monetary rates for mitigation of CO2 (carbon dioxide) emissions in Oregon do not reflect today's actual costs of mitigation projects. This is not a full mitigation.

I have other comments about air emissions, but will save those for the other hearings on the PSD air emissions permit.

In terms of groundwater, I have concerns about the offer of only \$25,000 per year for aquifer protection. This amount is quite paltry if groundwater is affected and according to the EIS there is certainly that risk. To quote the document again "SE2 has not yet provided sufficient hydrogeological information to determine how much additional drawdown would occur in any particular location." This is not acceptable. The document uses the word "volunteered" which makes me question if there is a written guarantee of receiving anything. All moneys volunteered are offered to Sumas, Washington and there is no mention of measures if Canadian wells are affected. As this is a shared aquifer, I want to see what they will do if they are affected.

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In terms of wetlands, the details of how it would be enhanced are vague. They mention a 10-year monitoring period, but do not say what happens if impacts are found. There is a significant amount of habitat impacted here and this vagueness is not acceptable.

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The section on flooding is disturbing, as well. There have already been many problems with flooding in this area and there are too many "ifs" and unknowns here. I don't accept that they don't have time to come up with modeling and a plan during EFSEC hearings and want to wait until 6 months prior to construction. They have known this was an issue for a long time and should have addressed this much earlier. What is their definition of

7

“reasonable mitigation?” That term makes me nervous. Flooding damage could easily go into the millions of dollars in the US and Canada and I find it unlikely they will pay all damages years after the plant is built.

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Again, in addressing the seismic issue, doing a proper analysis, investigation and analysis prior to construction and not as a part of EFSEC investigation is not acceptable. Why are they so unprepared to address these issues and impacts now when they must have known about them for quite some time? If they didn't, it would indicate an operation that is unprofessional and ill prepared to deal with crisis situations.

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SE2 had better also address the sewage issue because although the contract may not be up for renewal for some years, I can tell you that it won't be because but we **will not** have forgotten this by then and will not help facilitate SE2 in any way.

The SEIS seems to be basing their evaluation on information provided by SE2 which they have taken at face value and not investigated in any depth to see whether there is more to the story or if it is indeed true. I have seen the testimony of other witnesses that easily and correctly refutes the statements and information put forward by SE2 and it concerns me that this was not questioned more by the consultants that did the SEIS.

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In summary, clearly there is a lack of information and in depth analysis and most certainly there are risks involved and as such, should not go ahead. What is equally concerning is that there seems to be no mention of enforcement action or of mechanisms in place to ensure promises and assurances are carried out.

There is certainly more than enough reason for you to deny SE2 in this location.

Sincerely,

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