

P.O. Box 268

Chilliwack, British Columbia

V2P 6J1

October 14, 2001

Allen Fiksdal, Manager
 Energy Facility Site Evaluation Council
 PO Box 43172
 Olympia, WA 98504-3172

RECEIVED

OCT 15 2001

RE: Draft SEIS, Sumas 2

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Mr. Fiksdal,

The Chilliwack Field Naturalists have reviewed the Draft SEIS and believe that the change in carbon dioxide mitigation will not compensate for damages in Canada. As a major point source of pollution, the plant will have a grave effect on the air quality of the Fraser Valley, and will require a steady depletion of natural resources, release a main source of greenhouse gases into the atmosphere, acidify water bodies, and impact rare species.

1

Despite mitigation and monetary offsets proposed, the Sumas 2 generating facility will remain a major point source of numerous pollutants (Nox, CO, VOCs, PM10, SO2/SO3) in the upper Fraser Valley. The Fraser Valley already has the highest hospital emissions for respiratory problems. These pollutants will increase already serious health problems and health care costs in the Canadian population.

Sumas Energy 2 is not an energy efficient plant, consuming large amounts of Canadian natural gas and electrical power, and Canadian water for cooling purposes. In exchange, Canadians will receive large quantities of pollution, greenhouse gases, toxic organics and a depleted aquifer. One must question the viability of this energy plant and its heavy dependency on fossil fuels, especially in a potential seismic zone. The present and future expansion demands on Canada's non-renewable resources and on the Abbotsford aquifer is unacceptable.

2

In combination, SE2's pollutants containing sulfuric acid mist, nitric acids, ammonia, and volatile organic compounds (VOCs) will acidify water bodies in the Fraser Valley and

3

the Cascade mountain range. The resulting acid rain will have detrimental effects on single-celled organisms and multicellular organisms as it acidifies water bodies and damages plant tissue. Acidified rain is known to leach out important plant nutrients and to activate heavy metals such as cadmium and mercury, contaminating water supplies. World wide, fish stocks and forests are dying from the impacts of acidification. We do not want to see a repeat of the acidification and environmental damage that has occurred on the East Coast of Canada.

3

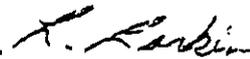
Particularly effected will be rare amphibians and fish in the Fraser Valley as well as those at their northern range limit in the Cascade Mountain Range. As the toxic mists fall in the form of acid rain in the upper reaches of watersheds and in shallow drainage basins, rare amphibians already on the brink may be lost forever. The Provincially red-listed/ federally vulnerable-listed Pacific giant salamander and the provincial/federal red-listed Oregon spotted frog are just two of the amphibian species in the valley which may be impacted due to changes in the acidity of their waters. The acidic mist also has the potential to harm many rare plants and plant communities federally and provincially listed in the Fraser Valley and Cascade Range. Areas with thin, rocky topsoils, such as the rare Gary oak habitat on Sumas Mountain which is the host species for a Provincial blue-listed butterfly, will be specifically sensitive to acidic rain. There is no way that SE2 can mitigate the loss or damage to rare plant and animal species in the Fraser Valley and Cascade Range.

4

If this energy facility is approved, the proposed mitigation and monetary offsets will not compensate for the problems created in the Fraser Valley and northern Cascade Range in human and wildlife populations. If the plant is built, there will no doubt be a future request to expand the plant and to increase these emissions. Due to the dire consequences that Sumas Energy 2 will have on the Canadian environment and endangered species, the Chilliwack Field Naturalists would ask that the Washington State Energy Facility Site Evaluation Council do not recommend approval of this project.

5

Yours Truly



Lee Larkin
President, CFN