

Sumas Energy2
Revised Application

OCT 16 2001

ENERGY FACILITY SITE
EVALUATION COUNCIL

Thank you for allowing us to respond to this revised application. Please allow me the opportunity to express my deep sorrow for the inhumane act that was perpetrated against you my neighbor on Sept. 11th. Whatever our concerns about this plant might be, we join with the US in their fight against terrorism. I ask that you recognize that this situation has caused many opponents of this proposal to refrain from commenting both publicly and in written form as they did not wish to appear to offend our neighbors or in some cases deal with the security issues that would face them at the border crossings and even through the mail system. Therefore those that respond actually represent far more in numbers than would first appear. The issue of terrorism has reinforced that this is no place to locate a plant of this size with 120,000 people in close proximity to it. It has been well reported that power plants will be one of the prime targets for terrorism in the future. You must consider the size of gas pipelines that will be needed to feed this plant. For whatever changes this proposal has undertaken it is still too many pollutants, not enough analysis and in the wrong location!

The Supplemental Environmental Impact Statement assesses the impact of this plant on the environment. After having evaluated this it would suggest that although there have been changes it is still a bad proposal for this area and in some ways just a different kind of bad. There are some areas that have not been addressed by this document.

2.2.1.1

The change in the increased stack suggests no adverse effect in the local area. The area to the northeast though will be seriously affected and this is already at the end of the funnel shape of the topography.

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2.2.1.2

No new significant adverse environmental impacts should not be translated to mean improvement. If it was bad before it is still bad possibly different but still bad. What are the effects of Ammonia mixed with SO2 on human health and why is this not being assessed? They also do not include the startup and shut down in their peak emissions analysis. Why should we trust their assessment of a 33% reduction in Nox? Did they not tell us in the first round of talks that they could not remove the diesel and yet now they have been able to do that?

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2.2.1.3

SO2 (sulfuric acid-the cause of acid rain and sulfer dioxide). It does not appear that the health risks of this increase has been analyzed. One must wonder if SE2 missed reporting these pollutants in their previous application why on earth would we trust them on this second application and what have they missed in it.

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2.2.1.4

The increase in formaldehyde is attributed to EPA changes, why did they do this or was it simply an omission as well from the first applciation?

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Recently there have been many medical professionals and reports that have come forward with information indicating that the health standards that have been set for emissions and pollutants are far too low. Therefore it is not acceptable for this council to consider only those in determining the viability of placing this plant in this overburdened airshed. The cumulative effect of these air emissions has not been analyzed with each other or those that already exist in the airshed. The 1.5 million will not buy our health or cleaner air, since SE2 was unable in the first round of talks to find offsets in this airshed the money is of no value. Noise mitigation plans should not be prepared after the permitting process is complete as there is no incentive for them to actually find effective proposals if in fact they could be found.

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Pg. 2-13 Table 2.2

The suggestion that they can reduce the wastewater drastically by reverse osmosis is questionable at best, since even if it is possible this will do nothing to reduce the amount of pollutants in the wastewater but rather raise the concentration levels. This is why we have asked the City of Abbotsford to take steps to get out of the sewage contract with the City of Sumas and at the very least give notice of termination at it's earliest possible date. Should this situation occur the wastewater would then become a side effect that Washington State will have to address and assess. Once again flood plain and seismic mitigation and modeling should be in place prior to permitting.

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Pg. 2-15

Nothing here would indicate that the site fill will have a more positive effect on the neighboring properties in the event of a flood, in fact quite the opposite is the case.

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Pg. 2-17, 2.2.3.4

The proposal now suggests that they will be in operation by 2004, which begs the question of where they will connect to the grid since they have given up their place in the que line at the BC Hydro grid in Clayburn. One can assume that they will likely go through Whatcom County.

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Pg. 3-1-1.1

It is stated here that the US does not intend to sign the Kyoto protocol but considering the close proximity to the Canadian border and our intention to sign, it would be prudent for the Council to keep this in mind.

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Pg. 3.1.3.1

Why did SE2 chose the lump sum path and then ask to negotiate their own arrangements? This monetary path is the easiest way out and puts all plants on a level playing field thereby allowing them to pollute more than their counterparts without any future regulations or controls in place. There is not provision for plants that increase or decrease in efficiency. Does not allow for increase costs of CO2 offsets in the future, which they invariably will.

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Pg. 3.2.1

The Agriculture industry in BC is working towards improving the nitrate levels in the groundwater. In the Fraser Valley we derive a good portion of our economic well being from Agriculture and Tourism. Sixty percent of BC's agriculture is produced in this area. This plant can locate somewhere else but we cannot so easily move our Agriculture and Tourism industries.

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SE2 suggests that they will find a new source of water if need be, why not find it now. They have already tried and found that it was not so easy. Wells on both sides of the border will be impacted and the money given to the City of Sumas does not guarantee water for the farmers on the Canadian side of the border.

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Pg. 3.3.1

They predict that they will have enough water for the 20-year projected requirements for the City of Sumas and SE2, what about the rest of the people on the farms.

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Pg.3.3.2

Comments that are of concern are: Number of wells is unknown in the 1-mile radius and SE2 has not provided info on shallow wells. Should this not be identified if they are going to assess this effectively?

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Pg. 3.3.4

Mitigation not identified? Not good enough, people's livelihoods are at stake

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Pg. 3.6.1

This plant with a minimum lifespan of 30 year lies in a 50-year flood plain with an existing power plant and other industry already there? Floods occurred in 1935, 1951, 1989 and 1991, this is the reality of this flood plain.

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Pg. 3.6.4

The suggestion that mitigation be provided after permitting is just not good enough and the suggested measures are almost laughable.

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Pg. 3.7.4

SE2 continues to request investigation, analysis and mitigation plans after the permitting process. This is very scary.

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Pg.3.7.5

There is very little reported here to endorse confidence in this plant being located here in this seismic area. It is unlikely that mitigations will be so easily found and once the plant is up it is too late to do anything about it.

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If suggested, proposed and future planned mitigation fails will they simply not build this plant? It is clearly stated in the SEIS Pg 1.3 that the total proposed output for plants for Washington far exceeds the forecasted demand. So why should they build in this sensitive airshed. There is also some concern that much of the previous application is not being analyzed by the SEIS and that some of the changes do affect previous statements and effects of this plant. The issues of natural gas, power lines and wastewater, that are non advisable in the document may still become a US concern depending on Canadian decisions and EFSEC may wish to consider this in their decision.

Many people have made statements and claims about this proposal, the challenge for EFSEC is to find the truth and consider all of the comments in context of what it means to the people who will be most affected by this proposal rather than those who have the most to gain financially.

Thank you once again for this opportunity to express our views and concerns!

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