

Letter CR 5

Mr Allen J. Fiksdal
Manager, Energy Facility Site
Evaluation Council,
P.O.Box 43172, Olympia,
Washington .98504-3172.

42-33133 Bourquin Crs W.
Abbotsford B.C. V2S 6B1.
October 16, 2001.

Re. Submission to E.F.S.E.C..D.S.E.I.S.
September 2001.

Dear Mr. Fiksdal,

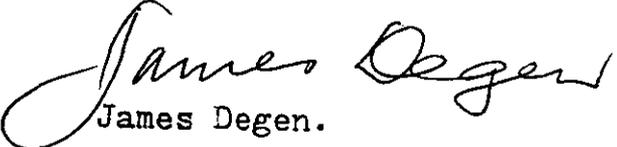
Please find attached written submission regarding
the above matter.

RECEIVED

OCT 16 2001

ENERGY FACILITY SITE
EVALUATION COUNCIL

Yours faithfully,


James Degen.

SUMAS ENERGY 2 GENERATION FACILITY APPLICATION 99-1

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT SEPT.2001.

Submission by James Degen, 42-33133 Bourquin Crs. West,
Abbotsford B.C. V 2 S 6B1

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1. Written comments on Flooding Potential and Wetlands.
2. List of E.F.S.E.C. references relevant to this submission.
3. List of external references relevant to this submission.

Annexures.

- A. List of media articles and photos
- B. Reproduction of Figure 3.2-2. from D.S.E.I.S.
- C. Letter and attachment from C. David Sellars, P. Eng., Operations Manager. Water Management Consultants dated October 12, 2001.

Draft Supplemental Environmental Impact Statement.

Submission.

Flooding Potential - The Plant.

The application provides fairly minimal information in the Second Revised presentation Dated June,29 2001 regarding this topic (see 3.3-4 and 3.3-5)

The application ,inthis section,referencesK C M,Inc. Technical Memorandums(dated June 19 and July18,1997) and derives an assumed 100 year flood event to require a plant pad elevation of 44 feet above sea level.

The application,in this section, offers E.F.S.E.C. "rigorous verification of the best available 100 year flood data will be completed prior to further site design". It is not clear,in my submission, just when this data will be made available to E.F.S.E.C. Is it requested by S.E. 2 from this section of the application that E.F.S.E.C. recommend approval of the application thereby allowing construction and the final elevation of the Plant Pad to be decided upon after E.F.S.E.C. approval.

The intention of the applicant as canvassed in D.S.E.I.S. of Sept. 2001(ref.3.6-2) says"S.E. 2 proposed to perform site-specific unsteady state flood modelling for 10,25,50 and 100 year flood events. From these words one may assume that E.F.S.E.C. is being asked to give its approval / recommendation to plant construction prior to the 10, 25, 50 and 100 year flood events analysis material being available to E.F.S.E.C..E.F.S.E.C. for its part requested this modelling to be completed before the end of October 2001 (see 3.6-2)

There was little material available to E.F.S.E.C. ^{on flooding} via the F.E.I.S of February 2001 regarding the S.E. 2 project. Consequently much regard and weight was placed in the initial approval of the City of Sumas for S.E. 2 to commence steps to seek approval

for its plant to be established on the Sumas flood plain. I believe any weight given by E.F.S.E.C to the City of Sumas approval to construct such a plant on an active flood plain must be treated with extreme caution given the destructive nature of floods and the frequency of flooding in the Sumas area from the Nooksack River.

In my submission it is inappropriate for the 10,25,50 etc year flood modelling to be deferred by E.F.S.E.C. for any reason.

Regarding the specific impact of the "elevation pad" of SE 2GF to flood flows in the surrounding Wetlands and creek systems I believe the best intentions of wetlands preservation and improvements contained in S.E.I.S will be swept aside during the first flooding of the Nooksack River unless E.F.S.E.C. has very specific and reliable information from the applicant or other independent consultants prior to E.F.S.E.C. approval/recommendation for Application 99-1.

I also believe the more reliable information E.F.S.E.C has on flooding of the Sumas area the more comfortable will the minds of E.F.S.E.C. members be in examining application 99-1. Regarding the 100 year flood event I've been advised that this period is prescribed in U.S. statute. and that similar Canadian statute prescribes a 200 year flood event. I'm also advised that the banks of the Nooksack River at Everson are 83 feet above Mean Sea Level. Annexure B to this submission(3.2-2) can be easily adapted by members of E.F.S.E.C. to more easily understand the downward slope/incline of land levels ^{north} ~~south~~ of Everson to the City of Sumas. This annexure also disclosed the relative Mean Sea Levels of Johnston Creek, Bone Creek and Sumas River as well as the town of Sumas. The exhibits in Part 3 and Annex. A (Namely Nos. 28 thru 33) show the concerns of U.S. and Canadian as well as Provincial and City (Mayors) elected politicians regarding the unstable state of the Nooksack River

In my submission E.F.S.E.C. should have significant regard to the deep concerns of the many elected officials from both sides of the International border over Nooksack River flooding and the very obvious damage the flood are having. The evidence shows that the Nooksack is averaging flood conditions about every seven(7) years (See Part 3 and Annex.C)

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If S.E.2.G.F. site specific flooding flow analyses as requested by E.F.S.E.C. is delayed until after E.F.S.E.C. approval, in my view, the plans for Wetlands and Creek flows as envisaged by the S.E.I.S. will be badly flawed and perhaps of little value.

James Dege

2. List of E.F.S.E.C References relevant to this submission.

- . Geologic Profile of the Sumas Aquifer Figure 3.2-2
D.S.E.I.S..... September 2001.
- . Sumas Energy 2 Final E.I.S. 3.2-5 100 -Year Floodplain Area
- . D.S.E.I.S Sections 3.5 Wetland. 3.5-1 to 3.5-13.
- . D.S.E.I.S Appendix A ..Sect. 401 Tech.Evaluation Memo.
- . " Chapter 6. List of Preparers.
- . " Section 3.6 Flooding Potential.
3.6.- to 3.6-4.
- . Final E.I.S. Appendix A KCM Hydraulic Modelling Memo.
- . " " Public Submissions and Letters regarding Flooding
Letter /Submission Ref's. No's. 65, 143, 145, 151,
243 and 247.
- .E.F.S.E.C. Application 99-1 Second Revised App'n. June 29,
2001.
Section 3.3 Water.
3.3-1 to 3.3-19

Annexure A. List of Media articles and Photos.

1. Flood scene Sumas City..... 1909.
2 pages of photos.
2. Flood refugees pouring into ABBOTSFORD.....Jan. 26, 1935.
3. Photos of flooded farms Sumas Prairie.....1935
3 pages
4. Sumas Prairie from the Air1935
5. Break in Sumas diversion canal.....Feb.12,1951.
N.B. Note reference to 1950 break in same dyke.
6. Sumas ,Wash. (2) Yarrow (1).....Feb.11,1951.
7. Town of Sumas,Wash. floodFeb. 21, 1951.
- 8 A river that wants to go home.....Nov 30, 1991.
9. Whatcom Road interchange Nov. 14 1990.
- 10.Sumas,Wash. Aerial photo Nov, 14,1990.
11. Nooksack River flood...Near Huntingdon..... Nov, 15,1990
3 colour photos on 3 pages.
12. Comparison of damage to same rail track near
Huntingdon. Nooksack River floods. 1935 and 1990
13. Nooksack a "constant fear" Nov. 30, 1991.
14. Statistics of a major floodNov. 30, 1991.
15. Lamson sounds flood alarmNov 23,1991.
16. Sumas..U.S. dyke plan could flood Sumas prairie..Mar. 21, 1992.
17. District of Abbotsford..Flooding Advisory..... Nov.1993.
18. For next big Frase r River flood..... May 25,1994.
19. Flood warnings on radio..... June 4,1994.

Annexure A cont'd.....

20. Big one is coming, but when..... May 28,1994.
21. River swells, but flood threat passes..... Dec. 24,1994
22. Nooksack flirted with flood Feb. 22,1995
23. Watch kept on Nooksack River Feb. 18,1995.
24. Nooksack floods: Accident waiting to happen... July 26,1995.
25. Fraser Valley faces 'huge flood threat'
via U.S. border river Oct. 17,1996.
26. Troubled waters set to boil over border..... Sat. Apr 19,
1997.
27. Nooksack only threatens.....
..... Undated.
28. Riverberry, Inc. Press release
'Nooksack River "avulsion" at Hopewell... May 8,1997
29. Nooksack River avulsion..... Apr. 21,1997
" " " May 9,1997
30. Nooksack River avulsion damage..... Apr. 30,1997
" " " " May,9,1997
31. Aerial view Nooksack River May 7,1997
" " " " " " "
32. Multilateral Meeting on Nooksack Flooding
Elected U.S. and Cd'n., Fed., Prov., City Reps.....May 9, 1997.
6 Photos.
33. Nooksack River Flood Mitigation Works Inspection.. Aug. 27,1997.
4 Photos
- Late Inclusions.
34. Here is what it looked like in '35.....
35. City of Abbotsford Press Release.
Nooksack Flooding 1997
36. Ice Storm Damage to transmission Towers
Seabird Island.....

Annexure A cont'd

37. Fraser Dikes need millions.....Sept 22,2001

38. Fallout: Baker may miss.....Sept. 10, 1980.

3. List of external references relevant to this Submission.

. List of Media Articles and Photos No's. 1 to 38

Annex. A.

. Site Location of Sumas 2 Plant from E.H. 2000-1

Letter and attachment of 8 pages from C.David Sellars,
P.Eng., Operations Manager. Water Management Consultants
dated October 12, 2001.

Attachment Titled "The Impact of Overflow from the Nooksack
River, Washington on Flood Levels in
West Sumas Prairie, British Columbia.

SEE ANNEX C