

19 Oct 2001-10-19

To: EFSEC

From: Rose Morrison, Agriculture Dept, University College of the Fraser Valley,
(please accept these brief comments – I ran out of time to write more)

**Sumas Energy 2 Generation Facility
Supplemental environmental Impact Statement**

Comments:

Air Quality

1. Sulphur dioxide emissions are increased in the revised proposal, due to new assumptions about sulphur concentrations in natural gas. While SO₂ levels are below current threshold criteria, sulphur dioxide has been identified as an air pollutant and any increase in emissions should be judged a serious detriment to air quality.
2. Greenhouse gas emissions. In 1998, the United states of America was responsible for 26.4% of worldwide carbon dioxide emissions and 22.7% of worldwide total greenhouse gas emissions (Draft SEIS, Table 3.1.1.) As the draft SEIS notes, although president Bush has said that he will not ratify the Kyoto protocol, it will still become international law if a sufficient number of other signatory nations ratify their treaties. S2GF will emit an estimated (perhaps, actually more than) 2.4 million tons of CO₂ yearly; the effect of this on global warming is unknown. Continued anthropogenic global warming is highly likely, with serious adverse effects. It is important to note that, if S2GF goes ahead, it may be one of several new generating facilities, cumulatively polluting Washington, Oregon and our common transboundary airshed.
3. SE2 Proposed (revised) Greenhouse Gas Mitigation Plan. SE2 proposes to offset part of its greenhouse gas emissions by making payments, for CO₂ emissions over a certain level, into an offset payment plan, to the Oregon Climate Trust. There are some serious problems with this plan: a) under the formula suggested, SE2 would pay \$8.4 million, over 30 years, and then no more. b) The implementation and effectiveness of carbon sequestration projects are not well documented and involve many variables. c) Sequestering carbon at ground level, through Oregon Climate Trust, is not guaranteed to reduce greenhouse gas emissions in the fragile and somewhat bounded, Sumas-Abbotsford airshed: even if this plan were effective, I suspect there would be a long lag time before any mitigation was noticed locally. d) The suggested emission fee pays less than half the estimated cost of carbon sequestration. e) It is a mistake to believe that natural resource capital (air quality) can be transformed into material capital (\$) and that the same value will be retained.
4. Impact on wetlands: Construction of S2GF would eliminate all the natural wetland on the site and hence the natural ecosystem: even SE2's proposed wetland mitigation does not meet the required mitigation standard (Table 3.5-3).
5. Ground water quantity: I do not see evidence that the operation of SE2 will still ensure a sustainable water table for Sumas.
6. Floodplains: there is potential off-site flood impact from this project that is not sufficiently addressed.

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