SE2 DSEIS - 15
10/16/2001 Hoekstra

Comments on the SEIS.

1. Greenhouse Gases - Where it mentions the Oregon Climate Trust - it doesn't make it clear whether the plan is to make offsets in the state of Oregon or rather in the closer vicinity where SE2 is proposed. Assuming the offsets will be made in Oregon, there is no mention whether Oregon is capable of mitigating the amount of CO_2 that SE2 would pay emission fees for, which isn't even the entire amount of CO_2 that SE2 would emit. Just because SE2 is willing to pay to the trust for a fraction of its CO_2 emissions does not mean that any of those emissions would be offset. If offsets were to be found in this area (Fraser Valley), who would force the Canadian gov't (provincial or federal) to accept making offsets here, when we are so opposed to this project? The provincial gov't has already promised to accept no negotiating on this proposal (in particular in the way of offsets), and so how would this Climate Trust be enforced here? Paying funds to a trust does not automatically deal with the emissions, and no clear plan was stated in this section of the SEIS. 1

2. Noise (how-frequency) - This section gives the allowable limits (at receiving property) set by the State of Oregon. The following table shows the levels at the source (SE2), and they are all about twice the levels allowed for receiving property. SE2 further states that it cannot determine what noise levels at receiving properties will be, and that no mitigation of "reasonably objectionable" noise levels will be undertaken until after 1 full year of operation. This is too little information 2

and too long a time wait after onset of operation. This is unacceptable to those who will considerably affected. As well, SE2 indicates it will select locations in Sumas and Whatcom County to monitor (in concert with City of Sumas and Whatcom County staff), but no mention is made of being in consultation with the City of Abbotsford or Canadian residents who live less than 1 km from th proposed plant and may also be adversely affected? As the City of Sumas is quite biase in their support of this project, I don't believe that they can be an objective source in monitoring complaints and concerns from residents. The mitigation proposals in this section seem far too vague, and if they are not adequate in correcting the problem, then we would be stuck with a very distressing situation. 2

3. Groundwater Quality - The SEIS acknowledges that such a draw on the aquifer could draw contaminants into the well fields the City of Sumas relies on, as well as private wells. Monitoring can be done, but this plant would have a huge draw on the water supply, I would think we should expect to see some change in the quality of the water, and regardless of whether that change would be significant enough to cause health problems, it sti has enough of an impact to possibly preclude futur industrial uses of the same water supply. 3

I take great exception to SE2's proclamation of a "reduction in water usage. This implies tha SE2 will see a reduction in the amount of

water pumped out of the aquifer. Perhaps there is a reduction over the amount proposed in the previous application, but it's only from 849 gpm to 802 gpm! There is still a major draw of 802 gpm, which is hardly a "reduction"! 3

4. Groundwater Quantity - To consider the use of such a huge amount of potable (drinkable) water for a single industry (that is not needed) seems unconscionable. SE2 admits that its large amount of groundwater would preclude other new potential users from obtaining large amounts of this water for other industries or even for private use. This is not good for promoting diversity in industries, and for one industry to use up such a large amount of potable water, when there are many areas of the world (as well as locations not far from here) that suffer severe shortages of potable water, seems selfish and definitely not in the interest of sustainability. 4

5. Flooding Potential - I would hope that EFSEC look at this area very carefully as from what I could gather from this section was that there was no conclusion at all as to whether SE2 would further exacerbate flooding. As someone who was confident, upon purchasing our home, that the risks of flooding were low, I would indeed be devastated (financially and emotionally) to find our sole investment damaged or destroyed by flooding due to the operation (and construction) of this plant. Records show that this community has been dry for well over 100 years, a single industry should not have the power 5

to change that.

6. Faulting and Seismicity - Again, it seems there is little in this section to draw a conclusion on. I think whenever an industry is proposed to be situated so close to a highly populated area, that decision makers should always err on the side of caution. If a major quake were to occur near the plant, a pipe rupture and/or spill of some kind could lead to a catastrophe. In speaking with representatives of B.C. Gas about their proposed expansion to Huntingdon, they could assure me that they had had no significant pipeline problems since their initial operations in the 1950's. However, we have not had a major earthquake since then either and neither the pipelines nor safety procedures have ever been seriously tested in such a manner. There is no outline on evacuation for nearby residents (if necessary), and I get the feeling that once again, this company feels the possibility (remote or not) of casualties are justified compared to the profit margin this plant would produce.

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