

Letter USS 1



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

October 19, 2001

Mr. Allen Fiksdal
Ms. Irina Makarow
Washington State Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

RECEIVED

OCT 19 2001

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Mr. Fiksdal and Ms. Makarow:

Re: Comments regarding wetlands on the Draft Supplemental EIS for the Sumas Energy 2 Generation Facility and the Technical Memorandum prepared by Jones and Stokes

Thank you for providing the DSEIS and the Technical Memorandum prepared by your consultants, Jones and Stokes. Both of these documents are well written and contain the information needed to accurately assess impacts to wetlands and appropriate mitigation measures. Based on our review of these documents, we concur with most of the statements, conclusions, and conditions for 401 certification with the following clarifications:

In assessing the wetlands impacts at the site and the proposed mitigation, the consultants for Sumas 2 used the Washington State Functional Assessment Method. This assessment method was developed by the Department of Ecology (Ecology), in part, as a tool for projects such as this, so that appropriate mitigation could be developed and linked to the wetland functions being lost. The functional assessment for this site has not been fully completed, and the results are not yet available. This was pointed out to Sumas 2 when Ecology was engaged in its negotiation of a stipulation with the company and it was agreed that the functional assessment would be completed in the future. In the stipulation between Ecology and Sumas 2, the company specifically agreed to:

As part of the final mitigation plan, SE2 shall apply the Washington State Functional Assessment Method (WFAM) by including the 8.8 acre scrub-shrub and forested wetland, and calculate the acre points for the proposed mitigation action. SE2 shall evaluate and discuss the increase and decrease (in acre-points) of each wetland function evaluated in the WFAM analysis.

Settlement Agreement Between Washington Department of Ecology and Sumas Energy 2 Regarding Second Revised Application, at pages 6 and 7.

Mr. Allen Fiksdal
Ms. Irina Makarow
October 19, 2001
Page 2 of 2

We suggest that EFSEC's consultants, as the 401 team, review the completed functional assessment and determine whether additional acreage is required to offset the functional impacts to wetlands. It appears that there may be a net loss of the water quality function due to decreased wetland area. If this proves to be the case, additional mitigation acreage may be necessary. Also, if the functional assessment is inconclusive or is not completed properly, then additional acreage as recommended by Jones and Stokes would be warranted.

Again, we appreciate the opportunity to provide comments. Please let Susan Meyer know if you have questions or require clarification on any part of this letter. Her phone number is 425-649-7168; her e-mail is sune461@ecy.wa.gov.

Sincerely,



Jeannie Summerhays
Section Manager
Shorelands and Environmental Assistance Program

JS:SM:sa

cc: Susan Meyer, Ecology
Ann Kenny, Ecology
Erik Stockdale, Ecology
Joan Marchioro, Ecology
Andy McMillan, Ecology
Kurt Leigh, WDFW