



City of Richmond

6911 No.3 Road, Richmond, BC V6Y 2C1
Telephone (604) 276-4000
www.city.richmond.bc.ca

RECEIVED

AUG 15 2002

ENERGY FACILITY SITE EVALUATION COUNCIL

Environmental Programs
6911 No. 3 Road
Richmond, BC V6Y 2C1
Info Line: (604) 276-4010
Fax: (604) 276-2758 / 276-4222

August 9, 2002
File: 6125-01

Allen J. Fiksdal
EFSEC Manager
Energy Facility Site Evaluation Council
925 Plum Street SE, Bldg. 4
PO Box 43172
Olympia, WA 98504-3172925

Dear Mr. Fiksdal :

Re: Proposed BP Cherry Point Cogeneration Project

The City of Richmond appreciates the opportunity to provide input into the scope of the Environmental Impact Study (EIS) for the proposed BP Cherry Point Cogeneration Project. The City of Richmond is concerned about potential impacts to the shared regional airshed and to our community.

We would like to ensure that the EIS addresses the following considerations:

- BP Cherry Point project avoids and minimizes air emissions to the greatest extent possible and mitigation measures are pursued to ensure a net improvement in air quality (e.g., through improvements made to the existing refinery and other offset measures)
- air emissions from the project are delineated (i.e., geographical extent and concentrations during different wind flows, etc.)
- potential acute and chronic health risks to the Richmond community and our neighbour communities on both sides of the border are evaluated both with respect to individual pollutants, combined loadings of emissions from the project and cumulative effects with other existing and potential future projects within the shared transboundary airshed
- areas of uncertainty associated with projected air quality impacts, including the relationship between pollutant loadings and health effects, be acknowledged and considered in development of mitigation strategies
- there is a process for informing communities of potential risks and results from follow-up monitoring and that this is done in way that can be understood by the community
- there is a requirement for a follow-up study to compare projected estimates with actual impacts and evaluate whether mitigation strategies met intended targets
- there is a process for incorporating continual improvements as new technology and information becomes available.

Please contact me at (604) 276-4130 if you have any questions regarding the above comments. Thank you for the opportunity to provide input into the project review process.

Yours truly,

A handwritten signature in cursive script that reads "Margot Daykin".

Margot Daykin, M.R.M
Assistant Manager - Environmental Programs

MD:md

cc: Mayor and Council
Chuck Gale, P. Eng. General Manager, Community Safety
Cathy Volkering Carlile, General Manager - Parks, Recreation & Cultural Services
David McLellan, General Manager, Urban Development
Jeff Day, P. Eng., General Manager, Engineering & Public Works
Jim Bruce, General Manager, Finance and Corporate Services
Mike Kirk, General Manager, Human Resources
Suzanne Bycraft, Manager, Emergency & Environmental Programs
Ken Cameron, Greater Vancouver Regional District



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

July 19, 2002

RECEIVED

JUL 22 2002

Mr. Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Manager
Post Office Box 43172
Olympia, Washington 98502-3172

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Dear Mr. Fiksdal:

SUBJECT: Comments on Scope of Environmental Impact Statement for BP Cherry Point
Cogeneration Combustion Turbine, Whatcom County; Application No. 2002-01.

Washington Department of Fish and Wildlife (WDFW) attended the Agency Scoping Meeting on July 9, 2002, at the BP Cherry Point Refinery. The Scoping Notice identifies a proposal to construct and operate a natural gas fired combustion turbine power cogeneration facility adjacent to the BP Cherry Point Refinery near city of Blaine, Washington. Following the scoping meeting we toured the project site and reviewed potential wetland mitigation sites. During the preliminary Site Study phase of this project, WDFW provided a list of issues for consideration. We have reconstructed that list of issues and recommend that the following list of issues be included in the scope of the Environmental Impact Statement for BP Cherry Point Cogeneration Combustion Turbine:

- Habitat Loss, including; wetlands, riparian forest, upland forest, and old agricultural fields.
- Wildlife loss resulting from habitat loss.
- Protection of Priority Habitats and Species.
- Changes in water use and implications related to increased demand.
- Storm water and erosion control facilities and methods.
- Outfall water temperature, toxicity, and implications for aquatic species, including herring.
- Construction methods and timing.
- Disturbance to wildlife from additional employees/vehicles.
- Discuss Mitigation Phasing: Avoid, Minimize, Restore, Replace, and Compensate.
- Identify specific mitigation measures and implementation timing.
- Describe mitigation monitoring methods and success criteria with contingencies and provision for oversight funding.



Mr. Allen J. Fiksdal
July 19, 2002
Page 2

DEPARTMENT OF FISH AND WILDLIFE

Thank you for the opportunity to provide these comments. We hope that you find them helpful. If you have any questions, my phone number is 360-902-2422.

Sincerely,

Curt Leigh
Habitat Program

CL:lw

cc: David Mudd
Brian Williams
Cynthia Pratt



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

August 6, 2002

Michelle Elling
Energy Facility Site Evaluation Council
925 Plum Street SE, Building 4
P.O. Box 43172
Olympia, Washington 98504-3172

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AUG 09 2002

Dear Ms. Elling:

Re: Scoping comments for the BP Cherry Point Cogeneration Facility project EIS.

ENERGY FACILITY SITE
EVALUATION COUNCIL

Thank you for sending me the Preliminary Scoping Report and the Completeness Assessment of the Application for Site Certification for the BP Cherry Point Cogeneration Facility project. These documents were very useful in determining what issues Ecology believes should be addressed in the EIS. The following scoping comments pertain to the wetland portions of the EIS.

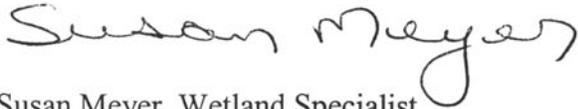
- The EIS should address how filling over 33 acres of wetlands will affect the hydrology of the surrounding lands that will be left undisturbed. There should also be an analysis of cumulative wetland impacts in this area from this project, recent past projects, and those planned or anticipated in the foreseeable future. The analysis should include a discussion of the impacts to Terrell Creek and its resources.
- The EIS should clearly discuss how the project siting process has properly followed mitigation sequencing (WAC 197-11-768). Avoidance is the first step in the wetland mitigation sequencing process. The EIS should discuss why the facility can not be located further to the north and closer to Grandview Road to avoid and minimize wetland impacts. This discussion should include dialogue between Whatcom County and BP on obtaining a variance to their buffer requirements. In addition, there needs to be an explanation as to why the construction laydown areas cannot be restored to wetland after construction is completed for the facility. This mitigation step is termed rectification. An alternative should be considered that places the facility further north by approximately 200 feet and all laydown areas are restored to wetland after construction.
- Appropriate mitigation to compensate for the loss of over 33 acres of wetlands must be addressed in the EIS. Specifically, there must be a discussion of how the area and functions of lost wetlands will be compensated. A detailed mitigation plan should be provided in the EIS so that the general public has a chance to comment on it.



- The EIS should address how the stormwater facility will be designed to meet Ecology's 2001 Stormwater Management Manual for Western Washington.

Thank you again for giving us the opportunity to provide input on the scoping for the EIS for this project. If you have any questions, please phone me at (425) 649-7168.

Sincerely,



Susan Meyer, Wetland Specialist
Shorelands and Environmental Assistance Program

SM:jc

Cc: Olivia Romano, Corps of Engineers
Bob Warinner, WDFW
Barry Wenger, Ecology
Don Kjosness, Ecology
Ann Kenny, Ecology
Jeannie Summerhays, Ecology
Andy McMillan Ecology
SEPA File # 200203487



Greater Vancouver Regional District
4330 Kingsway, Burnaby, British Columbia, Canada V5H 4G8

Policy and Planning Department

Telephone (604) 432-6375

Fax (604) 436-6970

August 8, 2002

File: CP08 01 BPA
Via Fax: (360) 956-2158

Allen Fiksdal, Manager
Energy Facility Site Evaluation Council (EFSEC)
Dept. of Community, Trade and Economic Development
Government of the State of Washington
925 Plum St. SE, Building 4
P.O. Box 43172
Olympia, WA 98504-3172
USA

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AUG 09 2002

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Mr. Fiksdal:

Re: Agency and NEPA/SEPA Scoping for the Proposed BP Cherry Point Cogeneration Project

As the technical lead organization for Canadian air quality agencies reviewing the proposed BP Cherry Point Cogeneration Project, we wish to advise EFSEC of our comments and concerns regarding the proper scope of the review for this project. These concerns have been identified by a multi-agency technical committee consisting of staff from Environment Canada, and the B.C. Ministry of Water, Land and Air Protection, as well as the Greater Vancouver Regional District (GVRD), who reviewed the air quality sections of the *BP Cherry Point Cogeneration Project – Application for Site Certification*.

It is our view that the proposed cogeneration plant has the potential to adversely impact air quality within the Lower Fraser Valley airshed. In addition to the air quality issues included in the *BP Cherry Point Cogeneration Project – Application for Site Certification*, we would also like the Council to take the following concerns into consideration for scoping the review process:

- **Particulate matter (PM) emissions:** The total amount of PM emissions from the proposed plant is an issue of potential concern. Primary PM emissions from this project are estimated at 270 tons per year, and would be released almost entirely in the form of fine particulate (PM_{2.5}), which has been linked to respiratory and circulatory diseases in humans. However, the project will also reduce emissions of other criteria air pollutants (e.g. NO_x and SO_x), which are precursors for fine particulate. Because it is not clear how the net reductions in emissions of these precursor species from the new project would affect the total amount of primary and secondary PM_{2.5} produced by the BP Cherry Point facility, we suggest that the project review examine this issue.

Page 2
August 8, 2002
Mr. Allen Fiksdal

- **Ammonia (NH₃) Emissions:** Ammonia emissions from the proposed plant are also an issue of potential concern. As currently proposed, the project will use selective catalytic reduction (SCR) control technology to reduce NO_x emissions from the project. The use of SCR technology is estimated to result in the release of more than 350 tons of ammonia per year. In addition to being toxic, ammonia is a precursor for secondary particulates (e.g. ammonium nitrate and ammonium sulfates). We believe that these emissions should be taken into consideration when examining the issue of fine particulate emissions from the plant (see above), and that the project review should include an examination of the implications of, and alternatives to, SCR technology.
- **Greenhouse Gas Emissions:** As proposed, the project would emit more than two million tons per year of greenhouse gases to the atmosphere. The proponent company has committed itself to greenhouse gas emission reduction targets on a worldwide basis. Other firms and agencies active in the energy generation sector, including Seattle Light & Power, the State of Oregon, and BC Hydro, have also developed policies and programs to mitigate greenhouse gas emissions. We suggest that the scope of the project review include a comparative review of the proponent's proposed greenhouse gas mitigation plan.

Thank you for the opportunity to present our concerns regarding the scope of the review for the proposed BP Cherry Point Cogeneration Project.

Yours truly,



Ken Cameron
Manager, Policy and Planning

cc: Morris Mennell, Environment Canada (via fax 604-666-6800)
Hu Wallis, Ministry of Water, Land and Air Protection (via fax 250-356-7197)
Hugh Sloan, Fraser Valley Regional District (via fax 604-792-9684)

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AUG 09 2002

ENERGY FACILITY SITE EVALUATION COUNCIL

August 9, 2002
File: 6125-01

Environmental Programs
6911 No. 3 Road
Richmond, BC V6Y 2C1
Info Line: (604) 276-4010
Fax: (604) 276-2758 / 276-4222

Allen J. Fiksdal
EFSEC Manager
Energy Facility Site Evaluation Council
925 Plum Street SE, Bldg. 4
PO Box 43172
Olympia, WA 98504-3172925

Dear Mr. Fiksdal :

Re: Proposed BP Cherry Point Cogeneration Project

The City of Richmond appreciates the opportunity to provide input into the scope of the Environmental Impact Study (EIS) for the proposed BP Cherry Point Cogeneration Project. The City of Richmond is concerned about potential impacts to the shared regional airshed and to our community.

We would like to ensure that the EIS addresses the following considerations:

- BP Cherry Point project avoids and minimizes air emissions to the greatest extent possible and mitigation measures are pursued to ensure a net improvement in air quality (e.g., through improvements made to the existing refinery and other offset measures)
- air emissions from the project are delineated (i.e., geographical extent and concentrations during different wind flows, etc.)
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- there is a process for incorporating continual improvements as new technology and information becomes available.

Please contact me at (604) 276-4130 if you have any questions regarding the above comments. Thank you for the opportunity to provide input into the project review process.

Yours truly,

Margot Daykin, M.R.M
Assistant Manager - Environmental Programs

MD:md

cc: Mayor and Council
Chuck Gale, P. Eng. General Manager, Community Safety
Cathy Volkering Carlile, General Manager - Parks, Recreation & Cultural Services
David McLellan, General Manager, Urban Development
Jeff Day, P. Eng., General Manager, Engineering & Public Works
Jim Bruce, General Manager, Finance and Corporate Services
Mike Kirk, General Manager, Human Resources
Suzanne Bycraft, Manager, Emergency & Environmental Programs
Ken Cameron, Greater Vancouver Regional District

**FRASER VALLEY REGIONAL DISTRICT**

8430 Cessna Drive, Chilliwack, British Columbia V2P 7K4

Phone: 604-702-5000

Toll Free: 1-800-528-0061 (BC only)

Fax: 604-792-9684

website: www.fvrd.bc.ca

August 8, 2002

File: 9050-20-84
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AUG 08 2002

Mr. Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
925 Plum Street SE, Building 4, Third Floor
PO Box 43172
Olympia, WA 98504 - 3172

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Dear Mr. Fiksdal:

Re: BP Cherry Point Cogeneration Project - EIS Issues

Fraser Valley Regional District (FVRD) staff have reviewed the Air section of the BP Cherry Point Cogeneration Project - Application for Site Certification and have the following suggestions for inclusion in the Environmental Impact Statement (EIS) to be developed for the project.

We note that the application reiterates in several sections that emissions of total criteria pollutants will be reduced through offsets in the refinery facilitated by the shutdown of older equipment. While this is technically correct, it leads the public to believe that all emissions (criteria and non-criteria) will be reduced, which is not the case. According to information presented by the proponent, there will indeed be a reduction in nitrogen oxide and sulphur oxide emissions, but there will be increases in carbon monoxide, volatile organic compounds, and particulate matter (PM10/2.5). The EIS should clarify that some criteria pollutants will be reduced, but others will increase. The statement about reduction of total criteria pollutants would only be significant if the toxicity of each one was equivalent, which is not the case.

Fine particulate matter is one of the pollutants of primary concern in the FVRD, as it has significant health implications for the general population. It can be emitted directly from sources (primary) or result from reactions in the air (secondary), both of which are related, in part, to emissions from fuel combustion. It would be appropriate for the EIS to consider the potential impacts of the cogeneration project on regional fine particulate levels, considering the increases and decreases in precursor emissions.

Further, emissions of carbon dioxide, a non-criteria pollutant and greenhouse gas, will also increase with only partial offset provided by the retirement of refinery boilers. The application describes BP's corporate policy for greenhouse gas reduction and indicates that the balance of the offsets will be found in other BP operations around the world. Considering that many countries are currently endeavoring to develop greenhouse gas reduction strategies, the EIS should put this initiative into context by comparing it those in other jurisdictions.

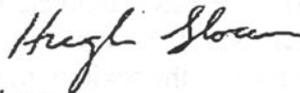
Ammonia is another non-criteria pollutant that will be emitted as a consequence of the operation of selective catalytic reduction (SCR) equipment for nitrogen oxide control. This pollutant has been identified with the formation of secondary fine particulate matter, often referred to as "white haze," through its reaction in the air with sulphates and nitrates, thereby reducing visibility, particularly in the Fraser Valley. The FVRD will be evaluating the scientific information related to this phenomenon in an effort to reduce or eliminate its effects. Any additional ammonia could aggravate this problem, and the EIS should consider the potential impacts of ammonia slip from the SCR units.

In general, we feel that the application over-emphasizes the fact that total criteria pollutants will be reduced and is not clear that there will be an increase in emissions when non-criteria pollutants are included in emission calculations. The EIS should put this issue into context to ensure that it is understood by the public.

Finally, we feel that the EIS or EFSEC itself should assess the impacts of other planned power plants on the airshed. The SE2 issue, natural gas price spikes due to supply issues, and gas pipeline expansions on both sides of the border have served to heighten the sensitivity of governments and residents to the resulting potential for significant air quality impacts from new power plants at a time when agencies such as the FVRD are attempting to reduce air pollution. The cumulative impacts of a series of such facilities is a cause for concern, and EFSEC should recognize and assess this potential situation.

Thank you for the opportunity to provide these comments.

Yours truly



Hugh Sloan
Director of Planning

cc Morris Mennell, Environment Canada
Hu Wallis, Ministry of Water, Land and Air Protection
Hugh Kellas, Greater Vancouver Regional District

Pacific Northwest Regional Council of Carpenters



*Affiliated with
United Brotherhood of Carpenters and Joiners of America*

4800 South 188th Street, Suite 220 • SeaTac, Washington 98188
(206) 248-8003 • 1 (800) 573-8333 • Fax (206) 248-2120

August 6, 2002

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AUG 07 2002

Allen Fiksdal, EFSEC Manager
EFSEC
923 Plum St SE, Bldg 4
PO Box 43172
Olympia, WA 98504

ENERGY FACILITY SITE
EVALUATION COUNCIL

SEPA/NEPA SCOPING COMMENTS: BP Cherry Point Cogeneration Project

The environmental Impact Statement for the Cherry Point Cogeneration Project should include the socio-economic impacts of displacing local construction trades people when out of area contractors bring in construction workers from outside this area.

Local hiring is important in the construction phase of these projects. It returns 15-20 times more income to the community at large on a yearly basis than the operations phase jobs which will continue after the job is built.

A similar project in Starbuck, Washington has committed to a local hiring policy which gives preference to residents of Columbia County and the surrounding counties, and then state residents. This policy is taken to apply to all employees equally, those employed in the construction workforce and the plant operations employees who will work at the plant when it is finished.

A local hiring policy is shown to contribute stability to the community in which the project is built and add continuity to the progress of the project.

Kirk E. Deal
Pacific Northwest Regional Council of Carpenters
3456 Martin Wy. E.
Olympia, WA 98507

KED/ac
opeiu:23



Public Health Services
Environmental Health Protection

#300 - 205 Newport Drive, Port Moody, B.C. V3H 5C9

Tel: (604) 949-7700
Fax: (604) 949-7706

July 30, 2002

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AUG 07 2002

Michelle Elling
Energy Facility Site Specialist
Energy Facility Site Evaluation Council
P O Box 43172
Olympia, Washington 98504-3172

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Ms. Elling:

Re: BP Cherry Point Co-generation Project Application for Site Certification

Thank you for your correspondence submitted to Mr. Rick Palliardi, Environmental Health Officer, Fraser Health Authority.

The Manager for the Environmental Assessment Program is not available until August 12, 2002, and is unable to make comments of the Environmental Impact Statement by the time stated in your letter of July 10, 2002.

On his return, I will be meeting with Mr. Chan, Manager of Environmental Health Services, and I will present the information, for his review and comments.

I would like to thank you for providing the information for our consideration.

Yours truly,

R Gear

Robin Gear, Manager
Environmental Health Services
Fraser Health Authority
Tri-Cities / Ridge Meadows

RG:bmd

cc: Steven Chan, Manager
Regional Programs
Fraser Health Authority

Elling, Michelle (OCD)

From: junine [jghoulden@shaw.ca]

Sent: Friday, July 19, 2002 3:20 PM

To: efsec@ep.cted.wa.gov

I am writing to oppose the application by BP West Coast Products under Application No. 2002-01 to construct and operate a cogeneration plant at Cherry Point, Washington.

My reasons are: The vast amount of foreign matter released into the air will have a devastating effect on the hillside-City of White Rock. I have found it interesting, especially in winter, to see the predominant wind direction from the

south. They should not be given the right to build a plant that can not help but affect people outside your own country!! I strongly believe the plant can be built much further south without too much difficulty and the power moved both north and south from that location. If the public is to be effected by their pollution, whether or not it is harmful to humans, it should be entirely retained within your boundary.

I will never be convinced that there will not be effluent that will not be directed by wind across the bay to the north. I believe there will be days when Semiahmoo Bay, Blaine and White Rock will be under a heavy fog created by such a plant that is of no benefit to those living in the area. Please, oh Please don't cause the people of this area suffering, mentally, physically and financially, simply to satisfy the insatiable power appetite of those people hundreds of miles away. With your respect for consideration. Gerry Houlden, #6-15130 Prospect Ave., White Rock, B.C., V4B 2B9

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JUL 23 2002

ENERGY FACILITY SITE
EVALUATION COUNCIL

Show of Hands - Know your audience

Canada 8
 B.C. 8
 Other 8

Business Development
 Tourism
 Health

COMMENT FORM

Proposed BP Cherry Point Cogeneration Project

Public Information and NEPA/SEPA Scoping Meeting
 July 9, 2002 6:30 PM to 8:30 PM

Name: Ms. PAT PETRALA Date: JULY 9, 2002
 Address: #106 - 15020 NORTH BLUFF ROAD, WHITE ROCK, BC V4B 5A4
 E-mail: patpet@shaw.ca Canada

Which issues do you think are important for us to consider? What are your concerns? We are very interested in what you have to say.

Please write any comments or questions you have below:

Request collaboration & shared communication on the COMBINED air flow & deposit concentrations for min. & maximum AIR QUALITY WITH existing (1) and (2) 10 year multiple projection IN The Greater Vancouver Regional District.

Have a visual friendly presentation on website & for media publication that will illustrate typical air flows; particulate sources (eg BC - Vehicles in III; industry; plants in US/BC) to identify RISK areas with advisories for people with asthma etc - to avoid or prepare to manage. Work with the Lung Assoc. Canada & USA to facilitate prevention & management.

Also - the cumulative factors be done. →

Use the back of this form or attach additional pages if you need more room.

Please place this form in the drop box, or mail or fax to:

Allen Fiksdal, EFSEC Manager
 PO Box 43172
 Olympia, WA 98504

Phone: (360) 956-2121 Fax: (360) 956-2158
efsec@ep.cted.wa.gov www.efsec.wa.gov

Give Microphone Volume instructions to public/speakers

BIG PICTURE Analysis

My point is to educate, inform, plan & prepare for short & long term impacts

① So that Cdn & US can identify & know which land areas could or should not be developed or preserved with zoning etc to allow

Ⓐ Senior retirement & / or Health Care facilities

Ⓑ Suitable or preferred areas for

- Agriculture
- Light - Medium - Heavy Industry
- Cdn. Hydro projects
- Schools / Parks

Land Use Planning

environmentalists

interveners

② Plan for preventative measures for vulnerable children & adults that need better air quality & awareness
As well as, Health Care providers to know when (seasonal or other factors) to be ready for more respiratory incidents.

□ Comparative Pro/Con Analysis helps defuse any misunderstandings or perceptions of a 'Sales Job' of nice need to know info. No RISKS have been explained.

Earthquake & Disaster Preparedness

↳ Other specific reply to any objections arguments that may be red flagged

STATE REPRESENTATIVE
42nd DISTRICT
KELLI LINVILLE

State of
Washington
House of
Representatives

APPROPRIATIONS
AGRICULTURE & ECOLOGY
CHAIRMAN
TECHNOLOGY,
TELECOMMUNICATIONS & ENERGY

July 9, 2002



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JUL 11 2002

Michelle Elling
Energy Facility Siting Evaluation Council
925 Plum Street SE, Bldg 4
P.O. Box 43172
Olympia, Washington 98504-3172

ENERGY FACILITY SITING
EVALUATION COUNCIL

Dear Ms. Elling:

BP West Coast Products, LLC has submitted an Application for Site Certification to authorize construction and operation of the BP Cherry Point Cogeneration plant. I write in support of this project and to urge you to grant the certification as requested.

ARCO and then BP have operated the Cherry Point Refinery here in Whatcom County since the early 1970s with an excellent safety and environmental record. The Refinery has an outstanding reputation as a good neighbor to the community. I have worked with BP officials and have found them to be honest, reliable and dedicated to the communities we both serve.

The proposed project will provide an efficient source of steam and power to their Ferndale Refinery, which will help insulate it from the electricity market price swings we have seen in the past few years and will certainly see again. It will also help maintain the economic viability for our BP Refinery, which is important to this community since the Refinery is one of the county's largest employers.

The proposed project would also help support the electricity infrastructure. The Bonneville Power Administration recently concluded that unless generation is sited in the northern Puget Sound area, additional transmission lines would be required to this area to ensure voltage stability. The Project will help maintain voltage stability without the need for significant new transmission line construction. Now is the time to act in order to help mitigate that need.

Thank you for your consideration and review of BP's request. I would be happy to speak to you personally in support of this project. Please call if you have any questions.

Sincerely,

KELLI LINVILLE
State Representative
42nd District

LEGISLATIVE OFFICE: 328 JOHN L. O'BRIEN BUILDING, PO BOX 40600, OLYMPIA, WA 98504-0600 • 360-786-7854

DISTRICT OFFICE: 104 W. MAGNOLIA, #306, BELLINGHAM, WA 98225 • 360-738-6177

E-MAIL: linville_ke@leg.wa.gov • FAX: 360-738-6178

TOLL-FREE LEGISLATIVE HOTLINE: 1-800-562-6000 • TDD: 1-800-635-9993

PRINTED ON RECYCLED PAPER

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JUL 18 2002

COMMENT FORM

Proposed BP Cherry Point Cogeneration Project ENERGY FACILITY SITE EVALUATION COUNCIL

Public Information and NEPA/SEPA Scoping Meeting
July 9, 2002 6:30 PM to 8:30 PM

Name: DOUG SMITH Date: 7/17/02
Address: 2201 LUMMI SHORE RD, BELLINGHAM
E-mail: dsmith@haskellcorp.com

Which issues do you think are important for us to consider? What are your concerns? We are very interested in what you have to say.

Please write any comments or questions you have below:

THROUGH YOUR NORMAL PROCESS, I EXPECT THAT YOU WILL ENSURE THAT THE APPLICATION MEETS ALL CURRENT REGULATIONS. THIS SHOULD RESULT IN ADEQUATE ENVIRONMENTAL PROTECTION. HOWEVER, THE PEOPLE WHO OPERATE THE BP REFINERY HAVE A REPUTATION WITHIN THE COMMUNITY AND THE INDUSTRY OF DOING MORE THAN IS REQUIRED FOR MERE COMPLIANCE. THEY TYPICALLY STRIVE FOR EXCELLENCE IN ALL ASPECTS OF THEIR PROJECTS AND OPERATIONS. IN THIS REGARD, I THINK BP SHOULD SET A VOLUNTARY GOAL TO MEET (OR EXCEED) THE BENCHMARK FOR EMISSIONS SET BY THE SE2 APPLICATION.

Use the back of this form or attach additional pages if you need more room.

Please place this form in the drop box, or mail or fax to:

Allen Fiksdal, EFSEC Manager
PO Box 43172
Olympia, WA 98504

Phone: (360) 956-2121 Fax: (360) 956-2158
efsec@ep.cted.wa.gov www.efsec.wa.gov



Pacific and Yukon Region
Environmental Protection
224 West Esplanade
North Vancouver, B.C. V7M 3H7

13 August, 2002

Our File: 4191-5-50

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AUG 16 2002

Allen Fiksdal, Manager
Energy Facility Site Evaluation Council (EFSEC)
Dept. of Community, Trade and Economic Development
Government of the State of Washington
925 Plum Street SE, Building 4
P.O. Box 43172
Olympia, WA 98504-3172 USA

ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Mr. Fiksdal:

Re: **Agency and NEPA/SEPA Scoping for the Proposed
BP Cherry Point Cogeneration Project**

I am writing to formally place on record Environment Canada's endorsement of the multi-agency comments provided to EFSEC by the Greater Vancouver Regional District (GVRD) in their letter of August 8, 2002.

The comments set out in the GVRD letter were finalised on the basis of an inter-agency review of the application information distributed to date by EFSEC as well as supplementary information obtained through direct meetings with the proponent. Environment Canada was a full party to these activities. As a result, our residual information requirements are captured within the GVRD letter.

We look forward to further discussion of this matter following due consideration of these concerns by EFSEC and the proponent.

Yours truly,

Adrian C. Duncan, P. Eng
Coordinator, Referral and Liaison
Environmental Assessment

cc: Morris Mennell, Environment Canada
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