Responses to Comments in Letter 161 from John Guenther, Whatcom County Planning and Development Services

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project.

2. The 115 kV transmission lines have been eliminated as an alternative.

3. A very detailed air quality impact analysis was prepared for the proposed project. In addition to the applicant's air quality consultant, the team included technical staff from the University of Washington, the Canadian Ministry of the Environment, and the Washington State Department of Ecology. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts related to the proposed project.

4. The toxic air pollutant impact analysis discussed in the Draft EIS concluded that for all toxic pollutants the 24-hour maximum and annual emissions are less than applicable regulatory standards for all constituents. Please see Letter 49, Response to Comment 9 for a discussion of toxic air pollutant impacts associated with the project. Please see Letter 81, Response to Comment 3 for a discussion of acid deposition as it relates to the proposed project.

5. Existing ambient air quality conditions were used as baseline conditions against which the incremental impacts of the proposed facility were evaluated. Incremental impacts due to the project were added to the background or baseline concentrations to determine if there would then be a violation of applicable air quality standards. This is a standard methodology for assessing air quality impacts. As discussed in Letter 3, Response to Comment 2, the analysis concluded that emissions associated with proposed facility when added to existing sources would be less than applicable regulatory standards.

6. Please see Letter 3, Response to Comment 2 for a discussion of air quality impacts in Canada.

7. Whereas no detailed investigation of impacts to water users has been conducted, Robinson & Noble has conducted a relatively simple analysis of the extent of theoretical drawdown that could result from pumping of the full allotment of the City of Sumas' water rights. This analysis is included in Appendix J of the Final EIS. With reference to the discussion of water rights, the information presented in the EIS is the basis for allocation of the City's water right; more recent water rights would not take precedence over the City's. We concur that consideration must be given to impacts to Canadian wells. Accordingly, the Final EIS recommends that mitigation measures that have been offered by the applicant for Washington wells that are impaired as a result of S2GF, should also be offered to Canadians whose wells are impaired.

8. The USGS has recently completed an extensive hydrogeologic study of the Sumas aquifer, to the extent that it may be one of the better understood groundwater systems in Washington. Similarly, major hydrogeologic studies were completed in the mid-1980s for that part of the aquifer within Canada. Considering the magnitude and duration of these studies, it is not considered likely that additional investigations would disclose appreciably more information that would be helpful in evaluating the potential impacts of this project. Please see General Comments D, E, F, and G, which discuss potential impacts to the aquifer and measures that are proposed to mitigate those potential impacts.

9. We are not aware that anyone has collected data that could be used to prepare quarterly potentiometric surface maps for the aquifer for the last five years.

10. Please see General Response I for a discussion of revisions to the proposed approach to wastewater disposal and volume.

    Please see Letter 151, Response to Comments 4 and 10. The Washington State Department of Ecology, the agency responsible for enforcing water quality regulations, has settled an agreement with SE2 to address control of water quality, including temperature. (See Volume 1, Appendix G.)

11. Please see General Response J, which discusses flood modeling and the impacts of constructing the S2GF fill pad above the 100-year floodplain.

12. Please see General Response J, which discusses flood modeling and the impacts of constructing the S2GF fill pad above the 100-year floodplain.

13. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of noise impacts related to the proposed project.

    The project area includes many sources of human-generated noise, including nearby industrial facilities, roads, and ongoing agricultural activities. It follows that wildlife in the area is somewhat tolerant of such noises. Wildlife is capable of adjusting to non-threatening noises, as evidenced by the difficulty wildlife managers have in frightening geese and ducks from fields using cannons and other noise-generating equipment.