

**Responses to Comments in Letter CO2 from  
Mary Reeves, Abbotsford Downtown Business Association**

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

- 1-5. These comments are outside the scope of this SEIS. The impact of air emissions was evaluated in the FEIS issued in February 2001.
6. The wastewater from the S2GF would include cooling tower blowdown, reverse osmosis reject steam, demineralizer waste, polisher waste, and office/plant employee domestic waste. Reverse osmosis would increase the concentrations of chemicals in the wastewater derived from the cooling tower blowdown. Nevertheless, based on the anticipated quality of these waste streams, all waste would comply with the city of Abbotsford Industrial Waste By-Law, No. 300-96, which is a requirement of the city of Sumas' wastewater agreement with the Fraser Valley Regional District and the city of Abbotsford. The wastewater flow from the S2GF would comprise less than 1 percent of the total domestic and industrial waste flows treated at the JAMES treatment plant.
7. Chapter 2.2.3 describes the proposed construction of the facility. For a discussion of impacts, please refer to Chapter 3. The discussions of impacts related to fill placement are provided in Sections 3.5 and 3.6 for wetlands and flooding, respectively.
- 8-9. Comments acknowledged.
10. Section 3.1 of the Final SEIS has been revised to reflect a higher estimate of actual CO<sub>2</sub> offset costs.
11. Comment acknowledged. Please note that this facility would not contribute to the nitrate levels in groundwater in Washington or Canada.
12. The applicant has indicated that it would provide monitoring to evaluate whether wells on either side of the border are adversely affected by the additional groundwater withdrawals required for the S2GF. If adverse impacts result from the increase in pumping, they have committed to providing mitigation for those wells that are affected.
13. The city's projection for water use over the next 20 years assumes an essentially constant consumption rate limited by its legal water right. Since this amount would not increase without the city obtaining an additional source of water, it would not affect the future availability of water to other users. To the extent that the pumping for S2GF would draw down the aquifer and result in an impact to the availability of water to existing private and commercial wells, the applicant has agreed to provide monitoring to evaluate this impact and to provide appropriate mitigation for such reductions, as described in the SEIS.

14. One of the first steps in the proposed groundwater monitoring program would be to conduct a detailed survey to determine the locations, construction details, and usage of all wells within the zone of potential interference.
15. The types of mitigation that could be accomplished, if necessary, would likely involve lowering the landscape in a nearby part of the floodplain to accommodate for lost storage, or perhaps creating a shallow channel to match the former flood flow. However, the need for such measures, how large they would need to be, and where they should be located, would be determined by the results of the flood modeling, which has yet to be completed.
16. It is fully expected that the 100-year flood could occur during the life of the facility. That is why the facility would be constructed above that predicted flood level, and mitigation measures would be required to compensate for any significant adverse flood effects that would result from its construction.
17. Please see response to Comment 15. The potential mitigation measures mentioned in the SEIS are routinely used to reduce potential flooding.
18. The types of investigations that are proposed to evaluate the seismic design of the facility are typically performed during the design phase of a project, unless there is some reason to suspect that the findings would preclude the safe construction of a facility at the site in question. Based on published literature, limited site investigations, and the state of the practice for seismic engineering, there is currently no reason to believe that this site could not be constructed to withstand any seismic event with a reasonable potential for occurring during the life of the facility. The investigations would provide the detailed information that would be necessary to develop a suitable and safe design. They would also include an evaluation of the recently proposed hypothesis that an active fault may be located near the site, and the probabilistic seismic hazard analysis would incorporate all potential earthquake sources in developing the design earthquake.
19. Please see response to Comment 18. If evidence for an active fault was found at or near the site, the design would have to take this into consideration in order to comply with applicable state and federal building codes.