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ENERGY FACILITY SITE
EVALUATION COUNCIL

November 1, 2003

Allen J. Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olumpia, WA 98504-3172

Dear Mr. Fiksdal:

Re: BP Cherry Point Cogeneration Project Draft EIS

I am a Birch Bay community resident and have attended the Scoping and Draft EIS public meetings in Blaine regarding the BP Cogeneration project. The air quality impacts to the Birch Bay community as well as the noise impact needs to be addressed in a way that can be understood by the community. I have been told that the EIS document is written so the public can understand the cumulative impacts of the project, but that is not the case. The public has been led to believe that all emissions will be reduced when in fact some of the more harmful pollutants (PM2.5) will be increased by an estimated 270 tons per year. 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. The Birch Bay community has the right to be told the truth in language that is clear. The EIS should put this issue into context to ensure that it is understood by the public. No health risks have been explained. The projected impacts on air quality and noise calculated by modeling must be followed up with adequate monitoring of the actual impacts on the Birch Bay community.

1

I would like to ensure that the EIS require the following:

- Clear language denoting which air pollutants would increase.
- A process for informing and educating a growing Birch Bay community of the potential acute and chronic health risks from PM2.5 especially to children and senior adults.
- A requirement for compliance and continuous monitoring of PM2.5 in specific sites throughout the Birch Bay community.
- A requirement to limit monitoring bias by requiring a PM2.5 quality assurance program. This will provide data with minimal bias so that decision makers and the Birch Bay community can address the concerns associated with fine particles in the atmosphere.
- A requirement for monitoring noise pollution making sure the actual impact meets the modeling expectation and promises.
- Emergency planning and risk management for the Birch Bay community due to an accidental catastrophic event or the release of ammonia stored or transported from the site.

2

The Birch Bay community is an urban growth area in Whatcom County and the population triples in the summer due to the seasonal/resort residents, tourists and campers. Birch Bay is becoming a significant destination for retirement. Senior adults as well as children are more susceptible to the health risks of PM2.5. The cumulative impacts of this project need to be made very clear so that the Birch Bay community has the opportunity to understand its impact on air quality, noise pollution, wild life and the environment. I am asking the EIS to be clear and truthful and to educate, inform, plan and prepare for the short and long term impacts of this project on the Birch Bay community. It is your responsibility and our obligation to ask for nothing less.

3

Sincerely,

Doralee Booth
Birch Bay Steering Committee