

# Preliminary Comments on Draft Study Plan for North Eden Pumped Storage Hydroelectric Project (FERC No. 13249)

*October 18, 2009*

The Study plan fails to address a number of critical items, as listed below

1. Depletion of aquifers on east side: The proposed sampling plan to conduct measurements is too narrowly focused geographically, failing to take into account unintended deleterious effects on aquifers bordering the project site. The report mentions only that residents located in close proximity to the project area have voiced concerns about the tenuous state of the aquifers. These concerns extend beyond the immediate areas next to the site, and have been previously articulated in comments to FERC before 28 June 2009 [reference the actual comments on the FERC site], The state of understanding of ground water hydrology is low and does not give confidence that the proposed project would not have a harmful effect. The proposal to study ground water hydrology does not cover an adequate time span to draw any meaningful conclusions.

An independent review by an expert party, acceptable to both Symbiotics and watchdog groups must be conducted in order for such an analysis to be credible.

2. The study plan does not address how aquifer recharging will be compromised by lined reservoirs that materially impede flow of ground water from the valleys where the reservoirs will be located.
3. The study plan does not provide sufficient detail to give confidence that the adverse impacts of construction on local traffic in both Utah and Idaho will be addressed. The safety issues are not addressed regarding pedestrian, bicycle and motor vehicular traffic. Hidden costs to taxpayers who would be required to bear the costs of widening roads to accommodate the increased vehicular traffic during construction must be taken into account in studies.
4. The study plan is deficient in addressing the impact on recreation around the lake. The impact on boat launches, camping facilities, cycling, pedestrians, fishing, boating and Boy Scout activities is not addressed in the study plan.
5. The study plan regarding impact on property values is entirely inadequate, focusing solely on visual impact of a new dam. Property values are a function of peoples' perceptions of aesthetics (partly visual), recreational value, uniqueness, curb appeal, tranquility, ease of access, security, and other important considerations that go beyond whether a dam is visible or not from a particular parcel of property. The study proposed purposely ignores looking into these other aspects making it an entirely inadequate analysis of the impact of the project on property values. The large negative impact of construction of a nearby dam on property values is not

addressed in the methodology proposed by the applicants.

The analysis on property value cannot be limited solely to Rich County, given that property values will be impacted in both Bear Lake and Rich Counties.

6. The adverse impacts on native flora and fauna need careful lengthy study, given that there are species that will not survive what is being proposed. The study plan for sound pollution is limited only to frequencies audible to humans, but fails to address the impact of sound on wildlife.
7. Given previous dam failure at the project site, seismic analysis should be reviewed independently by the Utah Geological Survey given the serious concerns of loss of life and property in what is a very active seismic zone.
8. The economic impact of the proposed project must be analyzed in its entirety and in its regional context, including its effects on the economies of both Bear Lake County (Idaho) and Rich County (Utah). The analysis must include job creation (following construction), the number and types of job categories proposed to be created, the taxes from sale of electricity, the (negative) impact on property values, the consequences of potential legal challenges that must be borne by Rich County should loss of water and property value occur, availability of electricity to local residents (only if contracted and guaranteed by Symbiotics).
9. The project is still presented as a non-hydrocarbon “green” mechanism for generating electricity, when it is simply an hydroelectric *regeneration* project conducted at a power loss, using existing sources for electrical power generation (largely coal).

## How to present

Thank Governor for meeting with you.

You are a landowner with a 70-year history at Bear Lake.

Symbiotics is proposing another pumped storage hydroelectric power regeneration project after their failure to launch the Hook Canyon proposal.

I am leaving you two documents to help you and your staff understand some of the major issues.

1. A copy of issues on which a number of citizens have commented to FERC last summer. They wrote their own letters addressing these points.
2. A first-pass analysis of the Draft Study Plan for North Eden Pumped Storage Hydroelectric Project, showing that a great number of the issues are still not being addressed.

What can the State do to help?

- Bear Lake is part of the State's sovereign lands—if this project damages the lake, a treasure will be destroyed. Taxes will be impacted and lawsuits would be likely.
- The state has agencies with expertise that need to evaluate portions of the proposal: seismic analysis at the dam sites, economic analysis, water quality, ground water hydrology, and impact on native plants/animals.
- Is there another approach, such as legislating a no-heavy industry radius to protect this resource?