

Date: _____

From: _____

Address: _____

To: Public Files for the Southeast Oklahoma Power Corporation Pushmataha County
Pumped Storage Hydroelectric Project No. 14890

Subject: Public Comment in Opposition to Project No. 14890

I am _____. I understand that the Federal Energy Regulatory Commission (FERC) has received a Notice of Intent and Pre-Application Document from Southeast Oklahoma Power Corporation (SEOPC) for a proposed pumped storage facility that intends to be located in Pushmataha County, Oklahoma. The intent of this proposed project is to send energy to Texas within the Electric Reliability Council of Texas (ERCOT) power grid.

I have an interest in this proposed project as I am _____ in _____, Pushmataha County, Oklahoma. I am opposed to this project as it would adversely affect my property and my livelihood. I do not feel there have been enough studies performed by the applicant to fully quantify the damages that may occur to our natural resources through their project development.

The pumped storage hydroelectric plant has indicated that it intends to divert water directly from the Kiamichi River via an intake 1.5 feet from the bottom of the riverbed. This is concerning as the region has recently seen an increase in tourism from visitors that want to spend time on the river and in the area. That industry will be greatly affected by this large project being placed directly off the river.

Landowners with senior water rights downstream of this proposed project will see reductions in their ability to utilize their permits to this junior user. Ecosystems dependent on the flows of the river will suffer due to the massive amount of water this project will remove from the river to fill the impoundments.

Lake Hugo receives its water from the Kiamichi River flowing downstream, the volume of water to fill the impoundments has the potential to degrade the water flowing into the United States Army Corp of Engineers (USACE) reservoir that serves not only as a recreational area, but also residential public water supplies.

Digging into the subsurface has the potential of damaging the senior property rights of groundwater wells in the general area. Domestic wells can experience drawdown if the subsurface water table has been breached and the water enters the impoundment rather than the river.

I am concerned that during construction activities, the debris and unvegetated soil could cause water quality damage to the Kiamichi River in high precipitation events. This would reduce the water quality for senior water right users, aquatic wildlife, and will diminish the flows in the Kiamichi downstream due to sedimentation accumulations.

I have a list of potential concerns I encourage SEOPC to study in good faith as a good neighbor to reduce or mitigate the damages that will occur with this proposed project.

Geology and Soils

- What are the potential impacts to flow, and their magnitude, from subsurface seepage through the surrounding alluvium aquifer in the Kiamichi River Basin due to digging the impoundment pond and lower reservoir through and below the alluvium?
- If any impacts occur, how will they be mitigated to prevent unpermitted subsurface flow, surface water quality, and water quantity issues?
- How will erosion from the edge of the Kiamichi River channel to the impoundment pond be mitigated? Will it be continuously monitored during the life of the project?
- Where will the spoil/debris go from excavating the impoundment pond? Will they impact water quality or surrounding terrestrial habitats? If so, how will that be avoided, minimized, or mitigated?
- Will there be a management plan for stormwater runoff during initial construction? If so, can the general public review and address any concerns related to that plan?

Aquatic Resources

- Will the reservoirs or impoundment pond be lined with a material to prevent seepage into or from the aquifer? What materials will be used?
- What management plan will be developed for hazardous materials during construction (e.g., fuel) to prevent contamination of water resources in the watershed?
- Will water quality monitoring, including salinity, be established in the reservoirs after construction and on any discharges into the Kiamichi River and its watershed?
- Will the use of algacides and/or biocides be used in the reservoirs or pumping mechanisms? What will those be and what are the potential impacts to water, aquatic wildlife, and the surrounding environment?
- Will measures be in place to prevent avian and aquatic interactions with both reservoirs and the impoundment pond?
- Will corrosion inhibitors, lubricants, and/or potentially carcinogenetic chemicals be added to the water at any time during the life of this project? If so, what are they and what are they used for, specifically?
- How will diversions be monitored during the initial fill and each year thereafter? Will gages be installed? What, if any, methodology will be used?
- Once initial fill is achieved, how will flooding events be addressed to prevent excess water consumption into the system?
- Should discharges occur in the upper reservoir, will those discharges be considered in basin or out of basin discharges from the Kiamichi River Basin to the Little River Basin?

How will this be addressed under the Water Settlement Agreement and Water Settlement Act?

Terrestrial Resources

- Is there a vegetation management plan in place defining BMPs to minimize disturbances to the existing vegetation during construction and to promptly revegetate the area to control erosion and protect terrestrial wildlife habitat?
- Are there annual and/or seasonal management plans to protect and prevent the extermination of federal endangered species in the project area?
- Will a preconstruction survey be performed to identify specific locations of endangered species within the project area?
- Will there be any monitoring of migratory waterfowl that would utilize the waters in the project area? What steps will be taken during operation to protect these avian populations?
- What steps will be taken to protect terrestrial wildlife, and people, from accessing areas near the project area, prior, during, and after construction?
- Will access to the site be monitored? If so, how?
- Will fencing and subsequent signage be placed on the reservoirs denoting the use and indicating that no fishing, swimming, or any recreational activities are allowed on the reservoirs and the site?

Cultural Resources

- Prior to excavation and construction, will there be an in-person and on-site archaeological assessment and coordination with the Choctaw Nation of Oklahoma for identifying culturally significant artifacts, sites, plants, or historic sites?
- During excavation and construction, will there be an archaeologist on site to monitor construction activities that may yield previously unidentified cultural resources?
- What management plan is in place if items of cultural significance are found? Who will be contacted? How will they be protected?

Socioeconomic Resources

- Exactly how many local permanent employees will be retained at the facility after its completion?
- Will there be any educational seminars, workshops, or information provided to surrounding landowners and communities?

I oppose this proposed project and I encourage the Commission to deny the permit.

Respectfully submitted,

For any questions regarding this letter of opposition, please contact me at: _____