

the 40-year operational lifetime of the plant, and compare those per-kilowatt-hour costs to electricity markets in the Western United States. If the costs appear too high for surrounding markets to bear, the application should not be considered "economically feasible" and should be rejected as required by Utah Code Ann. §73-3-8 (1) (a) (iii).

The applicant has not demonstrated the financial ability to complete the proposed works

Based on recent estimates, a nuclear power plant rated at between 1,500 and 3,000 MW would cost somewhere between \$6 billion and \$24 billion. The applicant has not provided any information to establish that it can finance such an expensive project. Unless and until the applicant can demonstrate the financial ability to finance a project of this magnitude, this application should be rejected. Utah state statute requires that the "the applicant has ~financial ability to complete the prop~ works." Utah Code Ann. §73-3-8 (1)(a) (iv).

The proposed use could unreasonably affect public recreation

Diverting water from the Green River near the town of Green River could substantially reduce water flow over sections of the river noted for their beauty and recreational value, including Labyrinth Canyon, Stillwater Canyon, and Cataract Canyon. Lower flows could reduce the speed of a float down sections of the river and make them less desirable. Lower flows can also expose hazards like large rocks that would normally be submerged-further threatening their recreational value. The length of the season suitable for river trips could also be shortened by lower flows caused by the nuclear power plant's water use.

The magnitude of the effect on the river would depend heavily upon the design of the cooling system chosen for the nuclear power plant. The applicant has not stated the design of the cooling system and should disclose this information in order that the full impacts to recreation may be determined.

The intake structures in the river, which would supply the water to gigantic pumps on the bank of the river, could be hazardous to recreation. Having a nuclear reactor next to the Green River would discourage recreational visitors to the whole area. Any commercial recreation company would have to be knowledgeable about any emergency response planning and have their own response plans in case of nuclear accident. The impact of the plant on Utah's commercial river guiding business and on private recreation could be disastrous and upset the economies of south central Utah and endanger human and biological life.

The proposed use could unreasonably affect the natural stream environment

If the State Engineer has reason to believe that an application to appropriate water will unreasonably affect the natural stream environment, the application will not be approved or rejected until the matter is investigated. Utah Code Ann. §73-3-8 (1) (b) (i).

The water application states that the appropriated water "may be 100% depleted." This statement does not indicate what kind of cooling system the nuclear power plant will use, and the effects on the natural stream environment depend upon the type of cooling system used.

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