



**HYDROPOWER
REFORM
COALITION**

*Putting water, wildlife,
and people back in rivers.*

David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

August 8, 2011

By Electronic Submission to records@utc.wa.gov

RE: *Additional Comments on the Study of the Potential for Distributed Energy in Washington State*,
Docket UE-110667

Dear Director Danner,

The Hydropower Reform Coalition (Coalition) appreciates this opportunity to submit brief additional comments on specific discussions during the July 25th work session and to comments previously filed. Our comments focus on hydropower related questions.

The work session primarily targeted interconnection and financial incentives, and did not address specific technologies in detail. However, in closing remarks at the end of the session, Ann Rendahl, Director of Legislation and Policy and session moderator did mention the well-documented impacts of conventional hydropower projects, stating that micro-hydro “has its own environmental issues that might make it difficult to include.” This prompted a participant comment that “small hydro impacts are among the lowest of all technologies.”

We strongly disagree with this assertion, and comments submitted by the Coalition on July 15th provide great detail on the proven and significant negative impacts of dams on rivers (regardless of size).

Written comments supplied to the Commission by the Local Energy Alliance of Washington (WALEA) support the concept that small hydro has minimal impacts and makes additional statements with which Coalition members take issue.

WALEA makes the following three assertions with which we disagree:

1. That the definition of renewable resources eliminates “certain types of hydro power (which can actually have the lowest impact per MWh of any technology ironically, but are caught up in water politics).”

In Washington State, eligible renewable resources include efficiency upgrades at existing dams and at non-power dams, canals, irrigation pipes and other water infrastructure, and new hydrokinetic projects. “Eligible renewable resources” specifically excludes new conventional dams (including micro, small,

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damless and run-of-stream). Those resources are expensive to build, diminish the goal for broadening the existing energy base in Washington State, create significant harm for rivers and streams, and, as explained in our earlier comments, would produce little new energy benefits even if built. For example, doubling the number of hydropower projects in the state with 10 MW or less of capacity would add only 150 MW of new capacity.

2. “Small hydro impacts are among the lowest of all technologies in terms of land use per MWh the main concern, fish impacts, are now heavily regulated. Any small hydro system that can be permitted under the current strict scrutiny given these projects is likely to have minimal negative impact while generating substantial positive impact in MWhs generated...”

Again, the existing data regarding the impacts of dams on rivers negates the claim that small hydro has minimal negative impacts. Likewise, data projections demonstrate that the new capacity potential is far from providing a substantial positive impact. From experience, Coalition members disagree that any project that can be permitted is likely to have minimal negative impacts. For example, the Federal Energy Regulatory Commission has just issued a preliminary permit for a small project on the North Fork Snoqualmie River. This project proposes to dam a stretch of river that has been deemed eligible for Federal Wild and Scenic designation, and is classified as a “protected area” by the Northwest Power and Conservation Council.¹ Regardless of the outcome (denial of permit or issuance of a final license), this project will require state and federal agencies, tribal interests, nonprofits and the applicant to spend time, effort and funding to develop, monitor and intervene in a project with significant negative impacts and with minimal energy benefits.

3. “Micro-hydro deserves a streamlined permitting path to what we have suggested for air quality and small bio-gas and biomass facilities.”

Coalition members believe that a streamlined process may be valuable for new nascent technologies that have the potential to provide new economic benefits and high-quality jobs in research and development, engineering, and manufacturing, all without putting additional strain on Washington’s last great river resources. However, it is not appropriate for a technology where the environmental impacts are well known and where the generation potential is very small.

Thank you for the opportunity to submit additional comments on specific hydropower related issues on the Commission’s study relating to development of distributed energy. Please contact me with any questions about these comments or the Coalition.

Respectfully,



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Northwest Coordinator
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¹ Stream reaches where the Council determined that hydroelectric development would have unacceptable risks of irreversible loss to fish and wildlife.