

# Low Impact Hydropower Institute

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September 25, 2003

Eleanor Stein, Administrative Law Judge  
New York State Public Service Commission  
3 Empire State Plaza  
Albany, NY 12223-1350

Subject: **Low Impact Hydropower Institute**

Dear Judge Stein:

I am writing on behalf of the Low Impact Hydropower Institute (“LIHI”) to urge that the New York renewable portfolio standard program recognize the comparatively high environmental quality of electricity produced by hydropower plants certified as “Low Impact” by the LIHI.

LIHI is a nonprofit, 501 (c) (3) organization that certifies environmentally low impact hydropower facilities nationwide to help energy consumers, and to support market incentives for reducing the effects of hydropower dams on the nation’s rivers and streams. Hydropower facilities certified as Low Impact have met LIHI’s environmentally rigorous Low Impact criteria which addresses river flows, water quality, fish passage and protection, watershed health, endangered species protection, cultural resources, recreation use and access, and whether or not the dam itself has been recommended for removal.

The LIHI criteria was developed in recognition that there are significant differences in environmental impacts among hydro plants. The air quality benefits of hydropower are widely known and both regulatory and market programs are appropriate venues to reward those benefits, but those rewards should not ignore the potentially significant impacts that some hydropower projects can have on river ecosystems. The only way to know whether hydroelectric facilities are environmentally appropriate is to evaluate the project in its site-specific river context. Commonly used size and date of construction criteria (e.g., projects less than 5 - 30 MW and built after January 1, 2000) do not effectively differentiate between low and high impact hydropower resources. Receipt of an operating license from the Federal Energy Regulatory Commission (FERC), is also not enough to establish a credible metric for whether hydropower is environmentally preferable. The LIHI criteria focuses on discerning relative environmental quality among hydro facilities.

The LIHI certification criteria and certification process is open to public scrutiny and participation in the certification process by the public is encouraged. Information describing the LIHI program and evaluation criteria is available on our web site:

[www.lowimpacthydro.org](http://www.lowimpacthydro.org)

The LIHI certification program is relatively new, having certified its first plant in March 2001. The amount of LIHI certified capacity has increased gradually, now totaling about 850 MW nationwide, including 45 MW in New York State (see the table at the end of this letter). We expect this total will continue to increase as more and more owners decide to request that LIHI evaluate the impact of their hydropower plants. While some hydropower plants will not qualify, we expect the certified total to grow significantly.

Hydropower plants face difficult economic conditions. We urge that the NY Renewable Portfolio program recognize the valuable contribution LIHI certified hydropower makes to electricity supply while effectively protecting the physical environment.

Please call on me if you would like more information or want to discuss this letter.

Sincerely,

Fred Ayer  
 Executive Director,  
 Low Impact Hydropower Institute

<b>LOW IMPACT HYDROPOWER INSTITUTE</b>			
<b>Low Impact Certification Status</b>			
September 18, 2003			
<b>Project Name and Owner</b>	<b>State</b>	<b>Size</b>	<b>Certification Date</b>
<b>Stagecoach</b> (Upper Yampa Water Conservancy District)	CO	0.8 MW (1 dam)	March 27, 2001
<b>Island Park*</b> (Fall River Rural Electric Coop)	ID	4.8 MW (1 dam)	June 7, 2001
<b>Putnam</b> (Putnam Hydropower)	CT	0.575 MW (1 dam)	April 10, 2002
<b>Falls Creek</b> (Falls Creek Hydropower )	OR	4.3 MW (1 dam)	June 3, 2002
<b>Skagit River</b> (Seattle City Light)	WA	690 MW (3 dams)	May 15, 2003
<b>Black Creek</b> (Black Creek Hydro Inc.)	WA	3.7 MW (1 dam)	July 16, 2003
<b>Beaver River</b> (Reliant Energy)	NY	44.8 MW (8 dams)	July 16, 2003
<b>Nisqually</b> (City of Tacoma)	WA	114 MW (2 dams)	April 15, 2003
<b>TOTAL</b>		<b>862.4 MW (18 dams)</b>	

\* Suspended September 17, 2001