



Certification Comments <comments@lowimpacthydro.org>

Comments on New Construction Eligibility

1 message

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To: comments@lowimpacthydro.org

Please see Natel Energy's comments on LIHI's consideration of expanding eligibility for new construction below.

Should LIHI change the cutoff date for new dams or diversions?

The point raised, which is that unless the vintage date is changed, then LIHI certified hydropower will be a decreasing resource is valid. Thus, if LIHI wishes to be part of encouraging responsible and appropriate growth in hydropower, it makes sense to change the cutoff date.

Is five years an appropriate timeframe to understand a new dam or diversion's impacts?

Five years is a reasonable place to start. Once some new build projects have successfully completed the certification, this timeframe can be revisited by the LIHI board as needed.

Should the new date be a specific date or rolling as suggested in the proposal?

The suggestion of a 5 year window prior to the date of the application makes sense. A specific date would result in LIHI having to revisit the eligibility date issue repeatedly.

Should other eligibility requirements be adjusted?

The focus of net benefit in the LIHI process is on habitat, which is certainly important. However, we think consideration of water specific benefits such as water quality, flood mitigation; in-stream flows, groundwater recharge, etc are also important. Such water benefits will be increasingly important as we see continued changes in the hydrologic cycle.

How should an applicant demonstrate net benefit to resource values?

In the licensing process, resource agencies should define the benefits that the project needs to create in order to be considered truly restorative to the watershed. The applicant should reference performance against those metrics in their application.

Does the definition of Net Benefit (page 42 of 2nd Edition Handbook) need to be adjusted?

The one thing that might be considered is to add a new category of net benefit that considers benefits with respect to water -- water quality, flood mitigation, groundwater recharge, in-stream flows, etc. However, the current definition is good as a simple definition that can serve as a litmus test.

Best,

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