

From: [Olson, Todd \(PacifiCorp\)](#)
To: mfischer@lowimpacthydro.org
Subject: Olson's comments on LIHI Revised Handbook
Date: Thursday, May 30, 2024 7:09:30 PM

Good afternoon Maryalice,

Please find below my comments on LIHI 2.06 Handbook Revisions. I hope you find these useful as you finalize the Handbook revision. Please contact me if you have any questions.

Have a great weekend! Todd

Todd Olson
Director, Licensing & Compliance
PacifiCorp
503.347.6251 work mobile

3.2.2 Suggest adding “established quantitative” to the following: “...jurisdictional resource agency or Tribal Nation’s established quantitative water quality standards.”. This addition is consistent with text in Standard B-3.

3.2.3 and 3.2.4 Standard C-4 and D-4. Text states “In all cases, resource agencies and Tribal Nations must approve the measures.....” What happens if a resource agency and/or Tribal Nation in a project area elects to not respond and provide input? The way this is written, the standard cannot be satisfied unless resource agencies and Tribal Nations provide approval.

3.2.8 Recreation Standard H-Plus. Suggest adding “coexist with or” to the following: “Such new opportunities could include campgrounds, whitewater parks, boating access facilities, visitor centers, trails, or the like, as long as these opportunities coexist with or do not create unmitigated impacts to other resources.”

4.4.1 and definition of Zone of effect. Please explain the reasoning for including the new statement “For hydro facilities at dams not owned or controlled by the hydro owner/operator, the impoundment should still be included in the application as a ZoE.” It is unlikely that the hydro owner/operator has any control over the impoundment and associated ZoE. Such waters are outside the control of the hydro facility. The positives and negatives outside the facility’s control are impacting ability to certify. (Ex. USBR dam and reservoir). Does this condition apply to hydro projects located on a water conduit in which the impoundment ZoE could be miles upstream of project?

Under definition of Diversion suggest including “flowline” to the following: “A diversion channels a portion of a river through a canal, flowline, and/or penstock.....”