

Good afternoon,

With regards to BC Hydro Draft Report, Docket # 11-RPS-01, I have the following comments to make:

I am an avid whitewater kayaker, hiker and general outdoor enthusiast who tours extensively around the Pacific Northwest, including mostly British Columbia(BC) and Washington. With the fairly recent proliferation of run-of-river hydro in BC, many of the streams I enjoy paddling on have had their instream water removed, or threatened to be developed and removed with little or no regard for the environment or recreation. In fact, there is very little oversight to the entire process, and pretty much all the diversions that affect outdoorsmen and recreationalists have no environmental review at the provincial level. It also used to be that the federal level would conduct environmental and navigability review, but this has recently been all but stripped as well. It is contributing to the destruction of our natural environment with no mitigation offered to those user groups affected. It is an amazing experience, besides being healthy and fun to run a healthy river, this experience is quickly becoming rare.

I agree with the staff conclusion that they do not find any compelling reason to modify the existing eligibility requirements of the Renewables Portfolio Standard statute in California to incentivize importing run-of-river hydropower from BC.

I request that staff correct the finding that hydropower from British Columbia is "potentially eligible." Hydropower from British Columbia is "currently ineligible," because hydro facilities greater than 30 MW or built after 2005 are ineligible as "renewable" under the California Renewable Portfolio Standard (RPS). Additionally, under California statute "a new hydroelectric facility is not an eligible renewable resource if it will cause an adverse impact on instream beneficial uses or cause a change in the volume or timing of streamflow." Hydroelectric facilities change the water temperature, prevent the natural flow of sediment and contaminants, affect high water events and flushes down the stream. Kayaking is impossible in a diverted stream where there is not enough flow left instream, little to no mitigation has been offered in this regard. Fish cannot swim upstream. Not to mention the effects of the logging streamside and unsightliness of power lines and buildings in the river.

California statute states that "to be considered eligible for California's Renewables Portfolio Standard, projects located outside the United States must be developed and operated in a manner that is as protective of the environment as a similar facility located in California." California laws are much more protective of the environment than those in British Columbia. California uses a comprehensive vetting system for their streams, all users are considered, this is a compelling reason why I venture down there to spend my tourism dollars. In BC users are being ignored in order to offer profit to a few private companies. The environment is being destroyed, I have seen in the news many examples of fish being killed en masse through the construction and operation of run-of-river and the few guidelines companies must follow to not appear to be followed even.

Thank you.

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