

The Kilarc Foundation

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June 23, 2010

Dr. Rowan W. Gould, Acting Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Re: Scope of USFWS Review of Renewable Energy Facilities Construction and Removal.

Dear Dr. Gould:

The Kilarc Foundation herein transmits our concerns regarding the actions of your agency in reviewing small hydropower projects in general, and in particular the Kilarc facility that is the subject of a draft Environmental Impact Statement (EIS)¹ just released by the Federal Energy Regulatory Commission (FERC). We urge you to take action and provide direction to USFWS staff participating in this proceeding to engage in meaningful evaluation of project alternatives and provide relevant feedback on the current analysis before the August 9, 2010 comment deadline.

In the California area, we are expanding electric generation due to increased demand. Any renewable energy that is retained or built helps delay or speeds retirement of fossil generation – in California from natural gas and coal. Due to the base-load nature of hydro, it is a substitute for coal. Every kWh of power generated by hydro is a kWh that does not have to be generated by fossil generation. State incentives promote renewable energy sources by providing attractive economic rates and subsidies.

The adverse environmental effects of fossil generation, especially coal generation, are not local. Coal is nearly entirely carbon and in burning, creates carbon dioxide. This gas combines with water and forms carbonic acid which blows with the prevailing winds east, polluting water bodies all across our nation.

An environmental evaluation of a project by a national agency cannot limit its focus on the immediate area of the facility but on the incremental impact all across our country. The downwind effects in the form of acid rain impact the epithelia of amphibians and fish alike. The concentrations in the water bodies have a tiny effect all across our nation (not to mention the 0.1

¹ Available as Accession Number 20100622-4001 on FERC eLibrary under docket number P-606 or directly at http://elibrary.ferc.gov/0/idmws/file_list.asp?document_id=13826844

pH decrease in modern times of our oceans). The effect in any one fresh water body from Western coal burning is very small and clearly unmeasurable as there are usually no standards for comparison. These pH effects combined with the rain of heavy metals and other pollutants from fossil generation poisons all the ecosystems over which your agency has jurisdiction – from California to Maine. The effect is secular and immeasurable and more important intolerable as our planet is no longer able to stand it.

Traditionally, your regional offices evaluate projects on a case-by-case basis looking only at the local, or at best regional, effects. However, the species destruction and general environmental degradation engendered from delaying or inhibiting renewable electric generation plants is not resident in the locality in which it is built. The impact is not local, the totality of the impact has to be evaluated as a portion of the whole sphere of influence of the plant – as extended through both air and water.

It is irresponsible not to consider at least national effects of the transported pollutants.

Your local decisions are wrapped in the near-religious environmental mantle of authoritative reviews; however, by not including the wider impact of your decisions you are far more guilty of not-in-my-back-yard (NIMBY) environmentalism than any project developer's as your purview is, at a minimum, nationwide. This US-wide national mandate - the very core of USFWS' existence - vests you with the responsibility for consideration not only of a local effect but with a national effect.

Ignoring or denigrating small effects inflicted over vast areas by your indifference and claims of metrology difficulties is as irresponsible as ignoring any widespread disease in humans simply because the effect on any one person is small. Our climate is currently heading towards global warming due to this same indifference. E. O. White estimates that as a result of proactive indifference by your agency most of the species extant in these United States will be extinct in 100 years.

What can be done? Fairly simple, take responsibility for protecting the Fish and Wildlife on a national basis rather than NIMBY regional organizations doing local impact analyses - not cognizant of impacts outside of a project's immediate region. In general, balance your project evaluations for FERC and other federal agencies by using a national perspective – not a project-footprint one. In an evaluation, the key will be the calculus of incremental effects aggregated across the nation – if not the planet - that result as a direct consequence of a local project. Once the mechanism and modeling is set up, the ability to address national effects will be possible for all projects.

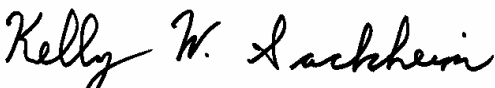
A complete model includes at a minimum:

- The direct impacts at the project site through air and water media,
- The direct impacts of the consequential generation change across the nation from the water and airborne impacts from the project.
- The actions from the construction and operation of the plant or its replacement through our economy.

The last item, for example, might be analyzed using Environmental Protection Agency (EPA)-generated Loentief type economic/environment (input/output) I/O tables.² A complete analysis would have to address, for example the additional impact from economic activity associated with plant construction as well as from delivering coal to supply facilities that must remain in operation until cleaner generation facilities are on-line.

In summary, we ask that you as a national environmental agency stop NIMBY environmental evaluations and take as a minimum impact area the Nation. There is no dispute that any project has an impact in its immediate area, but the very reason for your existence is the national perspective and therefore we request that you use it.

Respectfully,
The Kilarc Foundation



Kelly W. Sackheim, Director

cc: Dr. R. Ely

² Numerous energy-responsible countries perform these analyses in this way. See for example just one presentation at the 21st Conference of Mechanical Engineering Network of Thailand, 17-19 October 2007, Chonburi, Thailand, *Total Energy Content and Total Greenhouse Gas Emission Factors: The Updated Thailand Input-Output Table*, available at http://www.me.psu.ac.th/tsme/ME_NETT21/pdf/etm/ETM%2001.pdf

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