



# BC Sustainable Energy ASSOCIATION

## **BCSEA Position on Run-of-River Hydro Developments**

April 2008

### Preamble

The BC Sustainable Energy Association is a non-profit association of citizens, professionals and practitioners, committed to promoting the understanding, development and adoption of sustainable energy, conservation and efficiency in British Columbia.

BCSEA's vision is a future in which all of BC's energy comes from clean, renewable, efficient sources, for electricity, transportation and all other purposes, respecting the integrity of nature and the needs of humans and other species and their habitat, both now and in future generations, and in which BC is sufficient in clean, renewable energy, and does its share to contribute to global sustainability.

Our Mission is to facilitate BC's transition to a sustainable energy future through education, advocacy and tangible community projects.

Due to climate change and fossil fuel depletion, there is an urgent need to move society's energy use patterns away from fossil fuels, to energies that can be sustained in the long run, without costing too much money or causing undue environmental harm.

BCSEA believes that conservation and efficiency are the first and best solution to our energy needs because they cause the least environmental harm. Developing renewable energy is also necessary to allow society to reduce fossil fuel use.

### Position

BCSEA supports renewable energies such as wind, geothermal, solar, tidal and run-of-river hydro, provided that individual projects are properly sited and assessed, and they do not cause undue environmental or social harm. Key issues are: fish and aquatic life; wildlife; habitat; net life-cycle reductions in greenhouse gas emissions; recreational use; other social values, including scenic; and cumulative impacts. BCSEA particularly supports run-of-river hydro projects where they displace diesel-powered electricity generation, generally in off-grid locations.

Several regulatory changes should be made to ensure that environmental and social issues are adequately addressed for run-of-river projects:

- Local government control over land-use zoning should be reinstated.
- The provincial government should implement land use planning to govern the issuance of water licenses and the approval of projects. Run-of-river hydro would be limited or excluded from some zones, based on environmental and social values, including cumulative effects. A high threshold should be imposed in the process for requesting a legislative amendment to a park boundary, placing a priority on ecological and wilderness values and embodying the principle of no net loss.
- The triggers for provincial environmental assessments should include not only the 50 MW capacity threshold, but also the presence of significant fish or wildlife

populations and a threshold length for roads and transmission lines. It should be mandatory to include a life-cycle greenhouse gas emissions calculation and impact assessment for the entire project, including roads and transmission corridors.

- The environmental review process should be strengthened to allow for a more thorough testing of a project proponent's submissions by interested parties.

BCSEA strongly supports energy conservation, and we also support some expansion of run-of-river hydro, provided that individual projects are properly sited and assessed, cumulative effects are properly evaluated and mitigated, and that projects individually or cumulatively do not cause undue environmental harm.

Run-of-river hydro projects may be developed by public and private proponents, including BC Hydro, government, communities, co-operatives, First Nations and independent power producers (IPPs). BCSEA does not hold a single organisational position on the most appropriate role of each, except in that very small projects (such as off-grid projects powering one home) are most practically developed and operated privately or by small co-operatives. BCSEA members, board members, and employees are free to express their personal opinions on these issues but these views should not be construed as the position of the BCSEA.

Some regulatory issues are critical to ensure that social values and equity are safeguarded:

- The public should continue to own and control the existing BC Hydro system, including generation, transmission, distribution and operations. BCSEA is open to the option of expanded public ownership and development of projects.
- As with water license fees, there should be transparent and standardized fees for the use of crown lands for energy projects. Crown land should not be alienated to a private interest.
- There should be clear, fair and transparent regulations to address what happens to an energy project when its water license and any entitlement to use crown land expire. The transfer of larger projects to public ownership is a viable option to be considered.
- The provincial government should implement regulations to ensure that, if power is sold for export which has been generated using public resources (including rivers), the public will receive an appropriate return on the use of the resource. This could take the form of a government directive on access to the transmission grid.
- The government should also ensure, as far as possible, that any such power exports will reduce greenhouse gas emissions and contribute to sustainability in the jurisdictions that receive the power. This could include a Canadian east-west grid concept. This can be addressed through planning, policy directives on access to the transmission grid, and agreements with other jurisdictions (e.g. the Western Climate Initiative or an inter-provincial agreement).