The Bureau of Land Management and Energy Dominance

The Department of Interior is an important agency in the regulation of **firm, baseload** hydropower on federal reservations.

BLM Has a Large Role in Hydropower Regulation

4.7 GW

of **power capacity** within BLM reservations

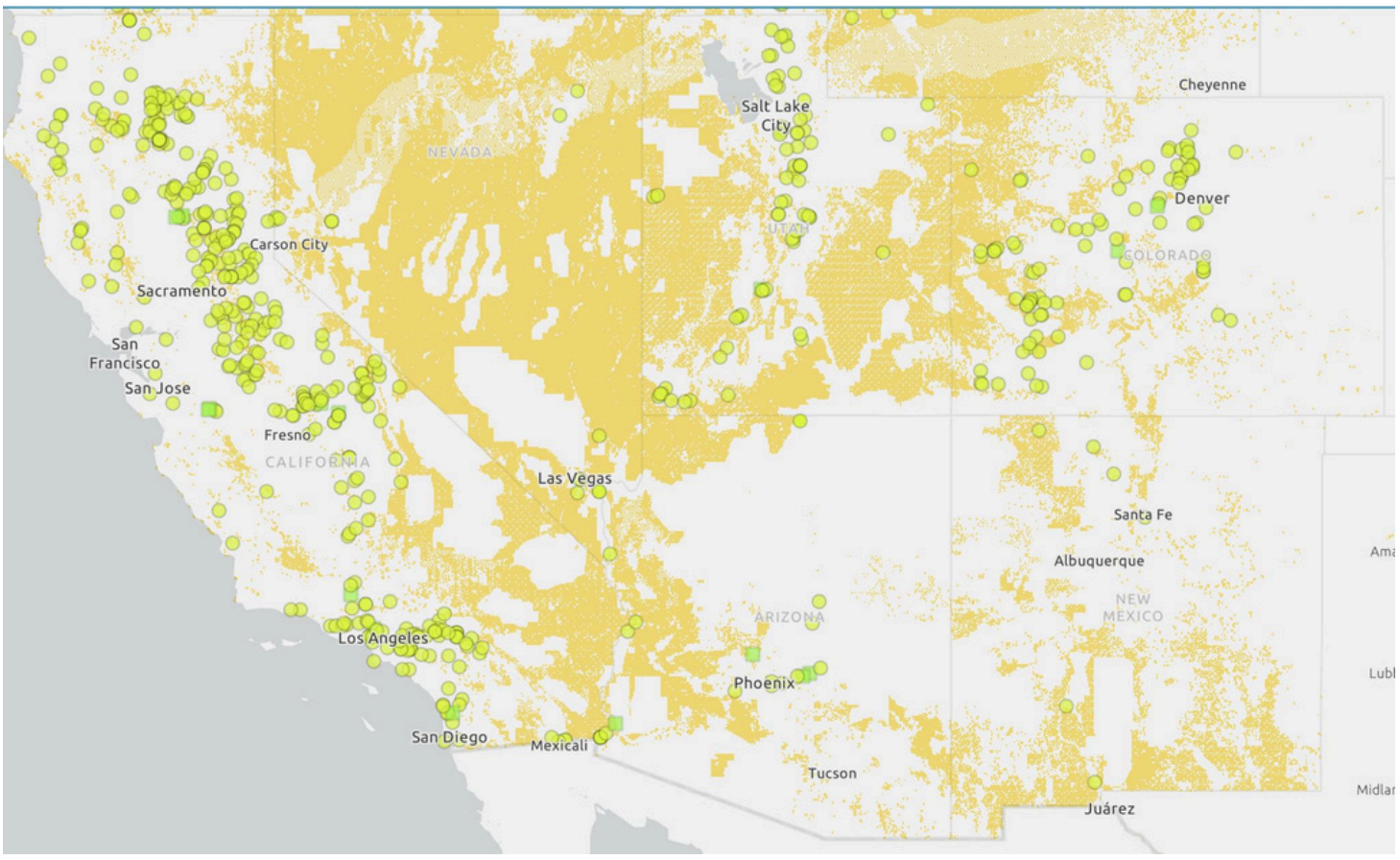
Calculated by identifying generator coordinates located within 0.5 miles of BLM lands

1.4 M

homes a year worth of affordable hydroelectricity

5%

of total **hydropower capacity** in the U.S.



Map of Existing Hydropower and BLM Land (ArcGIS and ORNL Datasets)

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Mandatory Conditions: Unchecked and Expanding in Scope

Mandatory conditions have grown in number and expanded in scope, increasingly divorced from economics.

1. Bucks Creek Hydroelectric
(P-619, EIS, 2020, California)

USFS required the licensee to collect monthly **bacteria samples**, conduct biweekly fish spawning surveys and **pedestrian surveys**, monitor macroinvertebrates, survey a**dult frog egg masses**, and measure the size of floating **wood debris.**

FERC staff did not recommend because it was **unclear** how these measures were **related to project effects or inform project actions.**

2. Phoenix Hydroelectric
(P-1061, EA, 2024, California)

USFS required the licensee to **reduce the population of redeye bass** in favor of native aquatic species by modifying minimum flows to dewater spawning areas. Redeye bass were **first introduced by California DFW in 1962 for recreational fishing.**

FERC staff did not recommend because the existence of the bass was **not related to project effects**. Local stakeholder opinion was mixed.

Under **Section 4(e)** of the **Federal Power Act (FPA),** DOI may issue **mandatory conditions** for hydro projects on federal reservations.

3. Boundary Hydroelectric
(P-2144-038, DEIS, 2011, Washington)

USFS required the licensee to monitor the **lead and zinc levels in fish tissues** for human health risk assessment costing **$102k**, **stock trout in 18 lakes within 15 miles of the project** costing **$2.1M**, stand up a **$2.5M fund for habitat enhancements** in creeks that flow into Sullivan Lake, and provide **$1.8M in payments to the Forest Service** for administrative costs.

FERC staff did not recommend concluding that these actions were **unrelated to project effects.**

4. McCloud-Pit Project
(P-2106, EIS, 2011, California)

USFS required **22.7 miles of road** to be built across federal land despite only **0.7 miles** of it being needed to access the **actual project works,** costing **$156M** over the life of the license.

FERC staff did not recommend, concluding that these roads were **not related to the project.**

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Hydropower is the Foundation of Energy Dominance

Hydropower is essential to the energy dominance agenda. Now, more than ever, the U.S. needs **reliable, affordable, and dispatchable** electricity

- **Unleashing American Energy** (EO 14154)
- **Declaring a National Energy Emergency** (EO 14156)

Problem

- Agencies impose conditions that **exceed** a project's **actual effects** or rest on **speculative assumptions.**

Solution

- Limit required conditions to those with a **clear, documented nexus** to the **direct effects** of the hydropower project

Therefore, the Secretary of the Interior should:

1. Issue a Secretarial Order requiring that all mandatory conditions and fishway prescriptions be directly related to current project effects and reasonably balanced against economic impacts.

2. Urge FERC to codify a lawful definition of fishway.

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