Department of the Interior and Energy Dominance

Interior Could Play a Critical Role in Unleashing Reliable, Dispatchable Baseload Power Throughout Our Nation

Interior Has a Large Role in Hydropower Regulation

19.6 GW

of **hydropower capacity** on DOI land

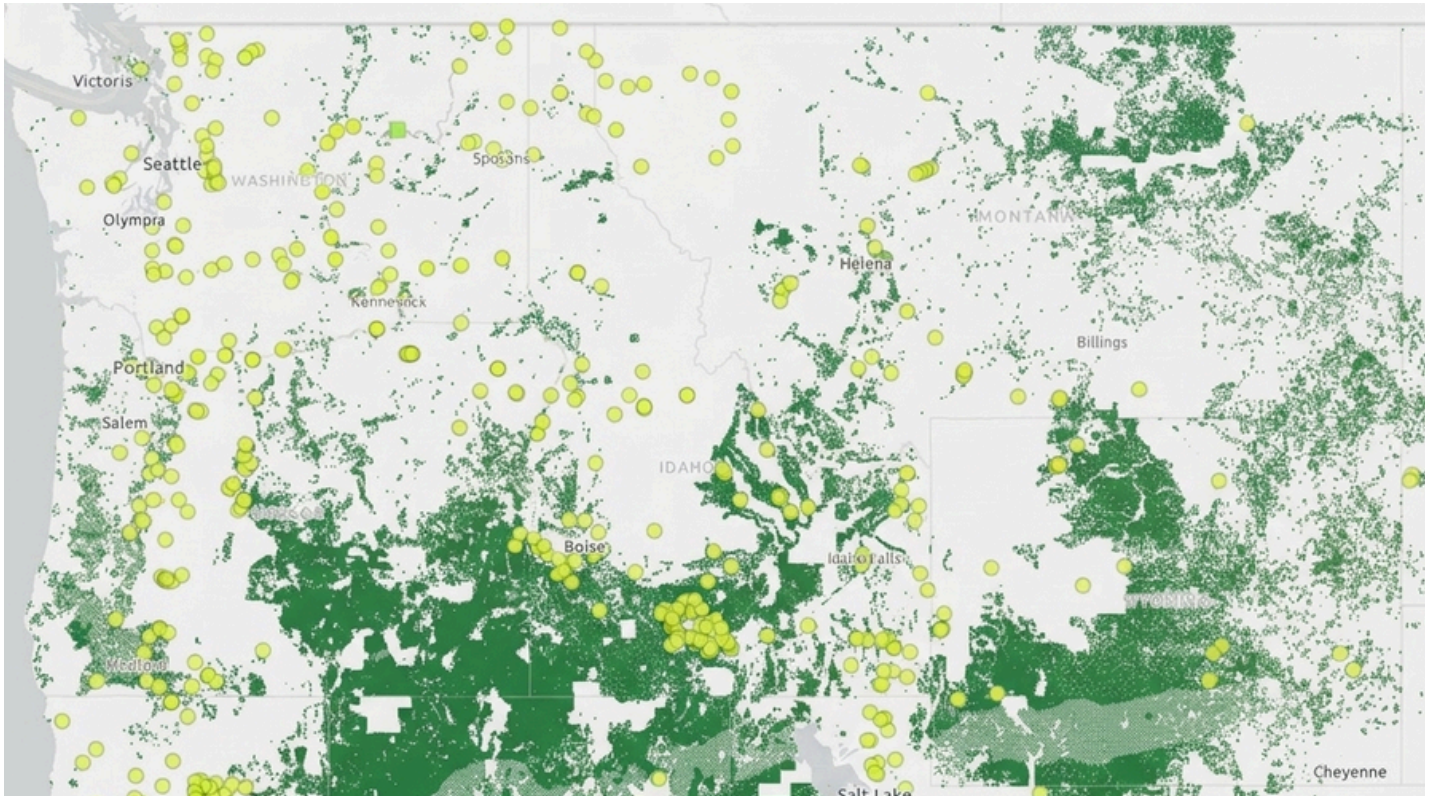
Calculated by identifying generator coordinates located within 0.5 miles of DOI lands

25%

of total **hydropower capacity** in the United States

6.2 million

homes' worth of electricity annually



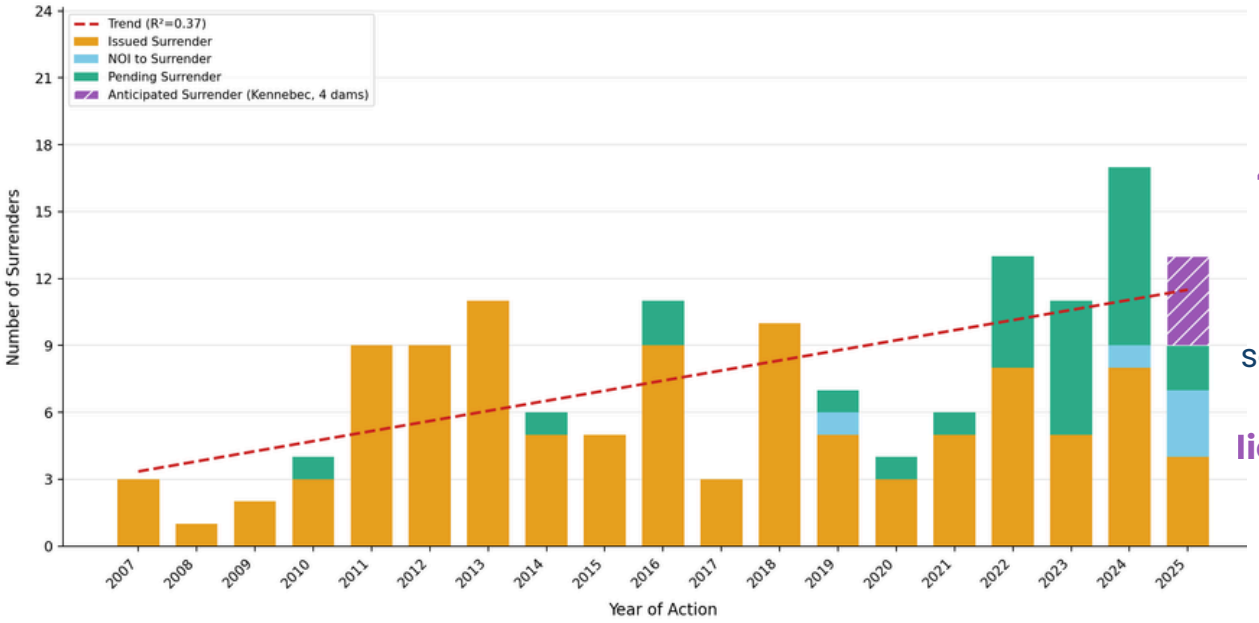
Map of Existing Hydropower and DOI Land (ArcGIS and Oak Ridge National Laboratory Datasets)

National Hydropower Association

Fish Passage Costs are Driving License Surrenders

45% of the FERC hydropower licenses need renewal before 2035. Mandatory conditions imposed at relicensing are costly and unpredictable.

LICENSE SURRENDERS ON THE RISE



In 2025, four **Kennebec River** facilities totaling **47 MW** — roughly **6.5%** of Maine's hydropower capacity — were sold to The Nature Conservancy for **license surrender**.

U.S. Hydropower Relicensing and License Surrender (ORNL, 2025)

2025 data as of June 9.

Of those pursuing surrender, **nearly half** have cited **economic infeasibility and cost** as the primary reason. An Examination of the Hydropower Licensing and Federal Authorization Process (2021), ORNL, NREL

Fish Passage is Capital-Intensive

Projects with fishway prescriptions have **administrative** licensing and relicensing **costs** that are

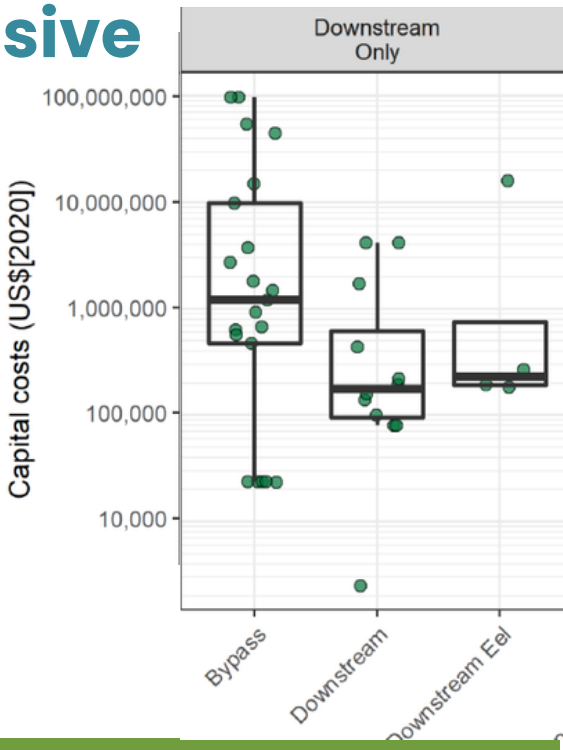
260% greater

than those without, and

projects with **overreaching** fishway prescriptions have **unpredictable capital expenses** from

$10,000–$100M

Cost of Fish Exclusion and Passage, ORNL (2023)



National Hydropower Association

Mandatory Conditions:
Unchecked and Expanding in Scope

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

1. Kaweah Hydroelectric
(P-298, EA, 2024, California)

BLM required construction and perpetual maintenance of a **300-gallon livestock water trough**, including **fencing and a wildlife escape ramp**, supplied by the project flows. FERC environmental staff did not recommend due to **lack of project nexus.**

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

2. Hells Canyon Hydroelectric
(P-1971-079, DSEIS, 2026, Oregon/Idaho)

BLM required that the licensee acquire and manage **41,747 acres of land** for environmental mitigation to address the construction and operational **effects of the original Hells Canyon buildout in 1967**. This would cost an estimated **$183M** over the life of the license.

FERC environmental staff **did not recommend** this condition because their policy for relicensing hydropower projects uses existing conditions as the **baseline for environmental analysis**.

3. Cornell Hydroelectric
(P-2639-028, EA, 2024, Wisconsin)

USFWS required changes to trash rack spacing and water intake velocities to support juvenile fish passage, with a capital cost of **$41.9M** and an annualized cost of **$4.1M** despite the lake sturgeon population being considered **healthy and sustained** by natural reproduction.

FERC environmental staff did not recommend because the costs outweighed the benefits, which were **speculative and immeasurable.**

4. Toledo Bend Hydroelectric
(P-2305, EIS, 2014)

USFWS required upstream eel passage despite sampling only **17 eel** at base of dam with a total cost of **$21.1M** over the life of the license. USFWS conceded **high predation** as part of population decline. FERC environmental staff did not recommend because **cost outweighed benefit**.

Under **Section 18** of the **Federal Power Act (FPA)**, **DOI** may issue **fishway prescriptions** for hydropower facilities to support the passage of a trust species

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.

NHA National Hydropower Association

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