



## FRIENDS OF THE RIVER

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BEFORE THE HOUSE COMMITTEE ON INTERIOR AND INSULAR AFFAIRS

Hearings on H.R. 4275, March 6, 1984

STATEMENT OF ROBERT LIPPMAN  
Southwest Representative of Friends of the River

Friends of the River is a political, research, and educational organization dedicated to the preservation of free-flowing rivers and creeks, and the conservation of water and energy supplies. We again appreciate this opportunity to present to the Committee another perspective regarding the generation of hydroelectric power from Federally-owned facilities in the Western states. The generation and marketing of such power has significant implications for Colorado River dam and reservoir operations, continued development in the Basin, and for streamflows and ecologies in the Colorado system, most notably in Grand Canyon National Park.

The bill presently before this Committee (HR 4275, Federal Reclamation Hydroelectric Powerplants Act), although not necessarily objectionable on certain specific grounds, unfortunately does serve to perpetuate an antiquated and inefficient system of ad hoc water and power development, which has historically subsidized Western electricity, at great expense (often catastrophic) to riparian ecologies and other river-related resources.

I. THE MARKETING OF UPRATED HOOVER POWER IS SYMPTOMATIC OF SERIOUS AND BROAD DEFICIENCIES AND INEQUITIES IN FEDERAL POWER MARKETING.

We agree that the increase in capacity of existing generating equipment at Hoover powerplant (Act, Sec. 201a) is circumstantially a viable alternative to present and increased peaking capacity at other Colorado River facilities, most notably Glen Canyon; however, the trend and program to develop and maximize such peaking capacity continues to proceed without adequate constraints or proper consideration of impacts.

The Western Area Power Administration (WAPA), which markets the power in question, bases its present marketing program upon an overprojection of present and anticipated demand, and an understatement of existing supplies. In effect, a false indication of demand is thus "signaled" to WAPA because the power is distributed at bargain-basement prices. Placing such power on a parity with power produced from other facilities and by other means, would immediately change the demand-forecast scenario and present a truer picture.

WAPA also fails to adequately consider conservation and renewable energy alternatives, which if correctly factored, would also change the demand-forecast scenario, by indicating that "additional" power is readily available through inexpensive, non-structural alternatives. This failure to consider these alternatives also promotes little, if any efforts in these areas on the part of applicants for Federal power.

WAPA has also failed to consider the well-documented environmental and other impacts that result from marketing decisions. The generation and

marketing of power necessarily involves environmental impacts. The manner in which hydroelectric facilities are managed affects the degree and magnitude of those impacts. The trend to maximize peaking capacity aggravates and accelerates downstream erosional, ecological, recreational, and other resource impacts, by virtue of the extreme water release regimes required for such operations.

At Glen Canyon dam, this trend, illustrated by changing seasonal release patterns and the uprating of existing generating equipment, is taking an extreme environmental toll on the riparian environment throughout the length of the Grand Canyon (to the head of Lake Mead). National Park values, involving mandated natural resource protection as well as recreational resources, are being impacted and degraded at an accelerating rate. To date, no proper NEPA compliance, by either WAPA or the Bureau of Reclamation, regarding both site specific and comprehensive impacts, has been implemented. The harm occurring to downstream resources far outweighs any benefits which might result from high capacity availability.

WAPA is also unlawfully marketing power that is not yet in existence, nor is guaranteed to ever go on line. We refer, for example, to Glen Canyon uprated power, which as stipulated in the document exhibiting the "Finding of No Significant Impacts" and "Environmental Assessment" for such, will not go on line should the 3-year, joint agency study find that the present or future operating mode is "non-optimum" for the environmental and other resources of Grand Canyon National Park. We again question the propriety of the Bureau's irretrievable commitment of resources to a major project for system uprating which, by their own admission, if believable, may never be utilized. In our view, a direct purpose of NEPA was to eliminate such waste, and mandate environmental studies before projects were committed.

We also wish to refer to our written statement before the Committee, in Needles, California, on September 8, 1983, regarding Colorado River management. We contended therein, and maintain as relevant to this bill, that the timed, seasonal, and brokered generation of peaking power as virtually a singular priority for operations (within other constraints of the "law of the river"), places downstream areas in extreme jeopardy from periodic flooding, or "controlled disasters". Peaking generation is predicated upon the maintenance of high reservoir levels (for pressure head) and the seasonal marketing of such power when the most "optimum" market exists. These factors, in effect, have the Bureau of Reclamation, as managing agency for Colorado River reservoirs, gambling on early-winter releases equaling the early-summer run-off, or Lake Powell inflow. Weather forecast models and methods do not, nor will ever exist to ensure this gamble. The result will be periodic flooding by virtue of spills (bypasses) which are prohibited by the Colorado River Basin Project Act, and which cost the treasury millions of dollars in lost power revenues (not to mention flood damages, loss of life and property). We noted in our previous statement (of September 8, 1983) that flood control by law carries a higher priority than the "incidental" generation of electricity.

We know of no legal authority that grants WAPA or the Secretary of the Interior the power to broker Federally-produced and non-Federally produced electricity. WAPA routinely buys power out of the grid, when surplus is cheap, and sells power on the grid - and ultimately out of it, beyond preference customers - when demand is high and supplies available (stored).

II. THE MARKETING OF "NAVAJO SURPLUS" MAY TEND TO PLACE PRESSURES FOR ADDITIONAL STORAGE FACILITIES.

In regard to the "Navajo Surplus" Act (Sec. 207a, et seq) we submit that the generation of such power as contemplated, also has environmental impacts. These involve not only air quality, but have long-range implications for significant impacts along other waterways. The "marketing and exchange" of this power, under WAPA's present marketing scheme, could imply the pumping of Central Arizona Project water at "optimum" times, as mentioned above, and thus could encourage development of other water projects for the convenient storage of this water, for this purpose.

III. RECOMMENDATIONS.

Again, we agree specifically that Hoover uprated power is circumstantially a viable alternative to Glen Canyon peak generation, and would produce significantly more capacity. We accordingly recommend that the Hoover uprates be approved, conditioned upon the following:

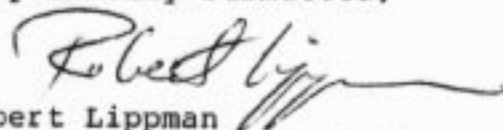
(A) That Glen Canyon releases will be balanced and circumscribed legislatively, towards a more base-loaded pattern, with even, seasonal shifts, in order to mitigate the impacts of present and anticipated operations on Grand Canyon National Park. Other alternatives to Glen Canyon peaking, should also be considered if true demand warrants (see below). National Park protection is already mandated by law, and the mere fact that Hoover and Glen Canyon operations are authorized by different project acts should prove no constraint to this alternative;

(B) That the price of Federally-produced hydropower be placed on a parity with other Western power, in order to at least allow for a truer scenario of Western power demand forecasts to develop;

(C) that both WAPA and the Bureau of Reclamation be subject to proper NEPA compliance, to provide a forum for discussion and analysis of the issues and impacts presented, as well as other pressing, intimately related issues and impacts regarding Colorado River Basin development.

Again, we thank the Committee for considering these comments, as part of the hearings record.

Respectfully Submitted,



Robert Lippman  
Southwest Representative,  
Friends of the River