

Policy Considerations, Urgency Action for Lower Snake Dam Breaching in 2016  
Using Existing 2002 Environmental Impact Statement (EIS)

1. The Corps of Engineers has inherent fiduciary responsibilities to insure existing projects continue to provide economic benefit, do not harm the environment and are technically sound throughout the project life.
2. The dams have a Benefit to Cost ratio of 15¢ on the dollar (.15 to 1) in terms of National Economic Development, the standard by which the Corps must measure economic benefit. Corrected Cost and Economic conclusions based on Corps data and planning processes show breaching via channel bypass has benefits ranging from 4 to 20 to 1.
3. 1 and 2 are why the Corps can act and place the dams in a “non-operational” status without the need for Congressional Authorization or by court order.
4. The 2002 EIS, signed by a Corps Division Commander, states that the Alternative for further Systems Improvements, is unlikely to recover juvenile salmon (and after \$800 million has not), is no better than the existing condition or doing nothing and that breaching provides the highest probability of meeting survival/recovery of listed Snake River Stocks. From a NEPA standpoint, this operable EIS provides the process documentation to undertake breaching and is also consistent with recent court rulings.
5. Corrected costs for breaching via channel bypass are \$339 million instead of the \$1.3 to \$2.6 BILLION stated by BPA in their March 2016 “Fact Sheet”. Corrected assumptions provide a far simpler removal of the earthen portion of the dam requiring only the simplest of design and contracting, essentially a Time and Materials contract for renting bulldozers and loaders to notch the dam for hydraulic removal and placement of armor stone if required. Contract preparation and award is a matter of a few weeks and easily within the Contracting expertise of the Corps. This process is a simplification of the method described in the 2002 EIS.
6. Bonneville Power Administration is responsible for approximately 92% of the cost of the Operations, Maintenance, Repairs of the 4 dams and 100% of hydropower capital costs, eg., turbine replacements, as well as Fish Mitigation required by the 1980 Power Planning and Conservation Act. Therefore, ratepayer funds, not new Congressional Appropriations, can be used to pay for the breach costs. Under the Fish Mitigation clauses of the 1980 act BPA could pay the full cost of breaching and could receive a credit on their Federal Debt for the dams should they choose to. Should the Corps pay the remaining 8%, the existing Authorized Columbia River Fish Mitigation Program could cover this cost as they would be exercising the most cost effective measure for salmon recovery IAW with 2002 EIS. As the power share varies by dam, the percentage for the first to be breached, Lower Granite, is 1.6%, yielding a CRFM cost share of \$800,000 (.016 X \$50 mill), easily available within the current budget for the juvenile bypass improvements on Lower Granite when terminated. Breaching will not lead to higher power bills according to the NW Power Council.
7. The Lower Snake Waterway locks will be closed to barge traffic for repairs in December 2016 for an unprecedented period of four months. Shippers on Lower Granite Pool are already planning alternative methods of shipping during the drawdown and breach of this dam.

Conclusion: All relevant ethical, policy, legal, financial, technical or biological reasons support a Dec 2016 start of breaching. Choosing not to, will waste additional millions of dollars, prevent salmon/orca recovery and would not be in keeping with the Corps motto.....Essayons.