Policy Considerations, How and Why Breaching the Four Lower Snake Dams Can Happen This Year

- 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. They do not need a Federal Judge to order a correction but can do so as an independent action.
- 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 with Regional effects adding more than 5K jobs in E. Washington and Lewiston.
- 3. 1 and 2 are why the Corps can put the projects into a "non-operational" status. This does not change the project Purpose thus does not need Congressional Authorization.
- 4. The 2002 Environmental Impact Statement, signed by the Corps Division Commander, states, the Alternative for further Systems Improvements, is unlikely to recover juvenile salmon migration (and after nearly \$1 billion has not) and is no better than the existing condition or doing nothing, and that breaching provided 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 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. Time to contract award is a matter of a few weeks and easily within the Contracting expertise of the Corps.
- 6. Since Bonneville Power Administration is responsible for approximately 92% of the cost of the Operations, Maintenance, Repairs for the 4 dams and full cost of all Hydropower capital costs, eg., Turbine replacements, as well as Fish Mitigation required by the 1980 Power Planning and Conservation Act, 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. They could do this as the most cost effective fish mitigation measure in the Columbia/Snake. System and to avoid loosing more money on generating power at a loss on the 4 dams.
- 7. The Lower Snake Navigation system was out of service four months this year with no noticeable effect on farm shipments. Grain shipments continue to shift to truck/rail to Portland and SeaTac or truck/rail/barge to Columbia river ports using Washington States grain shuttle service because it is cheaper than the using LSR Navigation.
- 8. Oversupply and balancing power already exist to take up loss of LSRD generation.

Conclusion, all relevant ethical, policy, financial, technical or biological reasons to support a Dec 2017 start of breaching are in place now. To not do so will waste additional \$millions and prevent salmon/orca recovery.

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