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Lieutenant General Todd T. Semonite
Commanding Headquarters, U.S. Army Corps of Engineers
441 G Street NW, Washington, DC 20314-1000

October 28, 2018

Re: Immediate breaching of the lower Snake River dams

Dear Lieutenant General Semonite:

This letter asks that you accept the prevailing economic and environmental realities that no longer justify the continued operation of the lower Snake River dams. USACE prides itself on “always doing the right thing.”¹ The right thing is not always easy if it means breaking with the status quo perpetuated by a regional command, but the ultimate reward of maintaining the agency’s integrity, while saving millions of dollars and taking the number one action to prevent the extinction of endangered species, is honorable, commendable, and in this case, not as difficult as some would have us believe. I have enclosed a document which outlines and updates the key economic and environmental impacts of the LSRDs.

The Lower Snake River Project is at a tipping point, and the current EIS/CRSO process is simply inadequate, too late, and unnecessary in light of the operative 2002 EIS. We are fast approaching the time in which the perpetuation of this financial and environmental drain will be realized and will become an unfortunate embarrassment to USACE and our Nation. In the past 6 months, the controversy over maintaining the lower Snake River dams has garnered massive press attention, with almost daily news coverage (at least 150 articles), including extensive coverage on the front page of the *Seattle Times*.²

Bonneville Power Administration's (BPA) Administrator, Elliot Mainzer, commented at a September 2018 Public Interest Quarterly meeting that the dams may be breached 3-4 years from now. This timeframe does not correlate to the biological and economic urgency. USACE recognized the significant benefits of dam breaching to endangered salmon **over 16 years ago**.³ Unfortunately, the situation is now critical, and every month counts. An additional 3-4 years means wasting millions of taxpayer dollars and the virtual, if not complete, extinction of the keystone species that define the Pacific Northwest ecosystem. BPA is in a financial crisis that can be alleviated, in part, by eliminating the LSRDs' substantial costs.⁴ The public is demanding action, with just one of the many petitions requesting immediate dam breaching gaining over 600,000 signatures in less than 4 months.

It is apparent from your experience that you are capable of issuing the bold directive that this situation demands – to begin breaching of the four lower Snake River dams, starting with Lower Granite in December 2018. Prior instances of swift and bold actions by USACE have succeeded in preventing catastrophes and your actions to breach the lower Snake River dams is critical to curtailing a disaster.⁵ As well said by the Secretary of the Army Mark T. Esper in describing his “third priority [of] Reform.” Reform means “improving the way we do business, including how we implement these priorities, to make the Total Army more lethal, capable, and efficient. ***This means changing the organizations, policies, processes, and tasks that consume time, money, or manpower without delivering real value, and applying the savings to our top priorities.***”⁶

Given the urgency of the biological situation and the lack of any progress in salmon recovery since the 2002 EIS, it is imperative that HQUSACE quickly intervene in order to break the cultural grip which prevents acceptance of the failed environmental and economic conditions surrounding the four lower Snake River dams.

My past and present experience shows that the Northwest Division has a strong bias toward keeping the LSRDs. This bias has led it to ignore data showing the near extinction

levels of endangered salmon and the related impact on endangered Southern Resident Killer Whales. Equally concerning are the Northwestern Division's statements that USACE does not have the authority to breach the dams and its excuses for delaying a decision on dam breaching until completion of the Columbia River System Operations Environmental Impact Statement (EIS/CRSO). President Trump's recent Memorandum ordering an expedited schedule for the EIS/CRSO process illustrates a government agency's flexibility to expedite review.⁷ Even then, USACE cannot wait until 2020 (or beyond) if it is to uphold its fiduciary duties to the American people and comply with environmental laws. The 2002 EIS remains operative and no law or court order requires review of the entire Columbia River hydro system before USACE can place the LSRDs in non-operational status as an underperforming project.

On October 19, 2018, I met with newly appointed Brigadier General D. Peter Helmlinger, Commander Northwestern Division and Lt. Col. Christian N. Dietz, Walla Walla District Commander and staff. The purpose of the meeting was to provide the General with accurate facts about the LSRDs. My hope is that as the new Commander of the Northwestern Division, Gen. Helmlinger will support a decision by you to breach the dams.

If you make the decision to breach the Lower Granite and Little Goose dams today, breaching can be done in the in-water work window between December 2018 and March 15, 2019⁸. The net positive environmental benefit of quickly breaching 2 dams is to prevent the death of 4 million Chinook smolts in 2019.⁹ This is the fastest way to save the fishing industry and to deliver several hundred thousand adult salmon to Southern Resident Killer Whales (SRKWs). Two years ago, you chided a 3-4 month breach plan was not possible. You have had 2 years to make and implement a breach decision, and still these dams remain.

According to Corps personnel engaged in the current systems review, if the dams are not breached this year, recovery of endangered populations, will require even more drastic actions, such as drawing down two Columbia River dams (John Day and McNary) to spillway crest for 5-6 months a year in addition to breaching the lower Snake dams.

I request the opportunity to have an in-person meeting with you to share Corps and other government data critical to this issue and to answer any questions you may have. I am confident that once you have taken the time to understand the facts, you will agree with the urgent need to starting breaching the dams. I am also confident that you will competently navigate the pathway to swift action.

Thank you for your consideration of this urgent continuing request.

Sincerely,

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cc: Assistant Secretary of the Army for Civil Works Mr. Ricky "R.D." James
Brigadier General D. Peter Helmlinger, Commander Northwestern Division
Mr. Elliot Mainzer (BPA Administrator)
Sen. Murray
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Enclosure:

Update on Key Economic & Environmental Impacts of LSRDs with enclosures

End Notes:

¹ (See “Initial message to the force from the 23rd secretary of the Army”, <https://www.army.mil/article/197205>).

² Mapes, L. (2018, Oct. 15th) “Orca survival may be impossible without Lower Snake River dam removal, scientists say”. Available at <http://www.seattletimes.com/seattle-news/environment/orca-survival-may-be-impossible-without-lower-snake-river-dam-removal-scientists-say/>; Mapes, L. (2018, Sept. 22nd) “Controversy heats up over removal of Lower Snake River dams as orcas suffer losses”. Available at <https://www.seattletimes.com/seattle-news/environment/controversy-heats-up-over-removal-of-lower-snake-river-dams-as-orcas-suffer-loses/>

³ NOAA Fisheries in its 2000 Biological Opinion for Federal Columbia River Power System operations recognized that removal of the four lower Snake River dams had the greatest potential to improve survival of Snake River salmon, including spring/summer and fall Chinook. As NOAA stated then: “breaching the four lower Snake River dams would provide more certainty of long-term survival and recovery than would other measures.” 2000 BiOp at 9-5. The U.S. Fish and Wildlife Service reached the same conclusion in a report to the U.S. Army Corps of Engineers in 2002, stating that: “the USFWS concludes that the benefits to fish and wildlife from the Dam Breaching alternative exceed the benefits provided by the other alternatives,” 2002 Corps EIS, App. M at M11-1 (“all available science (synthesized in Budy, 2001) appears to suggest that dam breaching has the greatest biological potential for recovering Snake River salmon and steelhead” Id., App. M, at M 10-1).

⁴ In speaking at the March 2018 Northwest Power and Conservation Council meeting, Mr. Mainzer stated: ***“If there is an axis of nonchalance (on one end) to panic (on the other), I think it is important that we don't get into a panic mode, I'm not in a panic mode, but I am in a very very significant sense of urgency mode”***. (Video available at <https://vimeo.com/260456507>, around the 4 min. mark).

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⁹ This number is calculated based on NOAA data. NOAA’s estimated mortality averages 10% per dam and reservoir. See NOAA Memo, dated Sept. 19, 2018 from Richard Zabel to Ritchie Graves, at Table 2. The total estimated number of hatchery Chinook released into the Snake River above Lower Granite is over 20 million. See http://www.fpc.org/hatchery/misc_docs/SnakeRiverHatcheryReleases.pdf. Ten percent of 20 million equals 2 million Chinook smolts killed at Lower Granite; ten percent of the remaining 18 million equals 1.8 million Chinook smolts killed, therefore, breaching 2 of the dams results in an estimated 4 million additional Chinook smolts.

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