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The Honorable R.D. James  
Office of the Assistant Secretary of the Army (Civil Works)  
108 Army Pentagon  
Washington DC 20310-0108

Subject: A failed Draft EIS and four shovel-ready projects on the lower Snake River call  
for your attention.

Dear Assistant Secretary James,

When I met Dr. Ryan with HQUSACE staff November 2018, I laid out extensive Corps, Bonneville Power Administration (BPA) and NOAA documentation that made a compelling case why four dams on the lower Snake River (LSRDs) should be decommissioned. The most important reason being they no longer provide an economic benefit to the nation. I was advised that through the Columbia River Systems Operations review, which included a new Environmental Impact Statement (EIS), these issues would be addressed. I strongly cautioned that given BPAs inability to identify costs of hydro generation by dam, along with industry bias, the report would produce unsubstantiated results with contradictory conclusions. Furthermore, the Draft EIS, designed as a programmatic type, would provide little meaningful or sufficient information as a means of updating the current operational 2002 LSRD EIS.

Now nearing the end of a four-year process, the Draft Environmental Impact Statement indeed evaluated these four dams with exaggerated benefits and exaggerated costs for the breaching with mitigation alternative. No surprise, the NW division is immune to embarrassment when protecting their projects, but the greater Corps and leadership should be ashamed by the poor quality of this draft EIS.

Simply breaching the four dams on the Snake River was dropped early on in the study process without explanation and pulled into a Multiple Objective Alternative (MO3). This alternative strategically positioned breaching as a “poison pill,” loaded with expensive mitigation measures and additional spill for fish passage on the Corp’s larger Columbia River Dams. This automatically reduces power output and revenue from the Columbia River dams, with a predicted cost to ratepayers that exceeds the cost of decommissioning and breaching the LSRDs alone. In a region that currently runs a surplus of hydropower, BPA adds this loss to the exaggerated claims of power replacement costs for MO3. Therefore, even though the current operational EIS has an appropriate breach plan, the new EIS seeks to undermine the feasibility of a well-developed and well-positioned transition. The proposed preferred alternative was then shown to be comparatively less expensive, though it does nothing to reduce cost nor revise the approach to salmon recovery.

In my meeting with Dr. Ryan I also explained how existing Corps policies and BPA ratepayer financing made immediate mothballing and breaching of the LSRDs reasonable and desirable. Given the COVID-19 crisis impacting the Corps, Bonneville Power Administration (BPA) and state budgets, it has never been a better time to reduce hydro-generation costs overall while pursuing least cost fish and wildlife

measures. Mothballing the projects would cost state governments nothing and would require no appropriations from congress. Bonneville's increasing debt confirms they can no longer afford to fund salmon mitigation measures, along with lower Snake River dam and lock operations and maintenance. Based on FOIA requests from the NWW, the costs on these dams is substantially exceeded by the revenues.

I believe it is also worth pointing out that the new DEIS and even the 02 EIS failed to account for the *thousands* of agricultural and related jobs created in a reclaimed Snake River valley post breaching. I would think that this administration would, especially in light of the COVID impacts to jobs, be looking for a win-win-win opportunity that breaching produces. By De-commissioning pork barrel projects, we would see the shift of federal and ratepayer dollars to other underfunded but higher priority hydropower and navigation projects. In addition, the over 20,000 acres of land now unusable to the American people, would become available for farms and vineyards, restaurants and wineries, fishing outfits, golf courses etc. Breaching the LSRDs is a "shovel ready", non-appropriated funded project that would also increase jobs by several hundred in the restoration and cultural resource protection sector.

As explained in authored reports given to Dr. Ryan, and based on the 2002 feasibility study, the controlled hydraulic breach process itself only involves 20-30 FTE's for each of two dams breached in the first year. This simplified approach requires no design; only time and materials type contracts would need to be applied. Corps employees working on the dams can be shifted to other dams or retire, since half are retirement eligible.

Assistant Secretary James, while initiating dam breaching late this year may sound infeasible, I can assure you that the documentation is already there or can be quickly updated/corrected to substantiate this action. Engineers, scientists and economists, many from the Corps, believe decommissioning through breaching is entirely within the Administration's authority and aligns with its goals of job creation and economic development.

Chris Pinney and I would like to brief you and answer questions on this matter. I have provided your office dozens of documents over the last several years, though you may no longer have them. The link is here to flaws we found in the DEIS, <https://damsense.org/fourteen-fatal-flaws/>, which will further explain its improper analysis. A recent report on the DEIS peeking capacity claim for the LSRDs is also included.

We look forward to your response and discussion. Given the district bias we ask that you not rely on the USACE NWD and the HQ Regional Integration Team to provide a response. The issue needs to rise above the regional politics and requires your leadership.

Respectfully,

*Jim Waddell & Chris Pinney*

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