

Why lower Snake River dam removal is not in the draft 2007 FCRPS BiOp

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The proposed actions for Columbia and Snake river operations and fish recovery developed by the federal action agencies in 2007 set forth clear steps to help salmon and steelhead on the road to recovery. NOAA's draft BiOp analyzes the impacts of these proposed actions in detail and whether these steps support species recovery. Breaching the lower four Snake River dams is not a consideration in these plans for several reasons:

- Dam breaching is not consistent with the multi-purposes of the dams. Congress authorized the U.S. Army Corps of Engineers to operate and maintain the four Lower Snake River dams for power, navigation and fish. Breaching would only address fish impacts.
- Breaching the Lower Snake Dams exceeds the scope of authority of NOAA Fisheries and the federal action agencies. Congress would have to authorize breaching; clearly, it is not reasonably certain to occur.
- Only four of the 13 Endangered Species Act-listed fish in the Columbia Basin pass the Snake River dams. Breaching the dams would do nothing to help the other nine stocks, with benefits to the four stocks being uncertain. In addition, Snake River fall Chinook are doing pretty well. Some of these stocks have habitat challenges in addition to passage challenges.
- In response to previous biological opinion requirements, the U.S. Army Corps of

Engineers studied Snake River dam removal. The final EIS, released in 2002, evaluated four alternatives to address the migration of four listed Snake River ESUs through the lower Snake River. This state-of-the-art, independent, peer-reviewed study concluded that breaching the dams by itself would not recover the listed stocks of salmon and steelhead. The Corps chose "adaptive migration" (major improvements to fish passage at the dams) as the preferred alternative.

- Since this Corps' study, the cost of replacing the power from the Snake River dams has continued to escalate. In the spring of 2007, BPA's in-depth analysis of replacement power costs concluded Snake River dam breaching would cost Northwest electricity ratepayers at least \$400 million to \$550 million annually to replace Snake River dam capabilities.
- The emission-free power produced by these dams is becoming more and more important to the region. The Northwest Power and Conservation Council in a September 2007 draft report about CO₂ impacts from Northwest power sources concluded that meeting the region's carbon reduction goals would be very difficult and that Snake River dam removal would set the region back. The report stated, "Given the difficulty of reducing CO₂ emissions, discarding existing CO₂-free power sources has to be considered counterproductive."