

SEPA Revised Draft EIS for Chehalis Flood Damage Reduction Project
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RE: Draft CFDRP Environmental Impact Statement (EIS)

To Whom It May Concern:

I offer the following comments regarding the Draft EIS.

I reviewed the previous draft in 2020 and concluded the approach was fraught with too many negatives to be a viable solution. This new draft doesn't appear to me to overcome the flaws in the overall concept either. I think the proponents need to focus on different approaches such as the Local Actions Alternative along with additional refinement of the LAND program as part of the Chehalis Basin Strategy.

This new draft at the outset presents unsupported, perhaps even contradictory, statements and conclusions which are worrisome. For example, the applicant warns the future under climate change portends increased flooding, while at the same time noting that aquatic biological resources in the affected watershed will face negative consequences due to climate change. But it's not clear how this project is going to benefit aquatic animal life under future circumstances, and in fact they present statements to the contrary:

“... There would be significant impacts on spring-run and fall-run Chinook salmon, coho salmon, steelhead, lamprey, mountain whitefish, freshwater mussels, amphibians, and macroinvertebrates. Some of the amphibians are listed or candidates for listing in Washington State as endangered, threatened, or sensitive. Modeling was done to identify impacts on salmon and steelhead in areas of the Chehalis Basin near the proposed flood retention facility.

The modeling predicts declining numbers of salmon and steelhead into the future due to climate change, which is made worse with the proposed project. The subbasin upstream of Crim Creek supports populations of salmon and steelhead that are genetically unique from salmon and steelhead in other subbasins of the Chehalis River Basin”¹. (underlining added)

The summary document goes on to list additional negative impacts from the project. To cite an example, the draft notes elsewhere there are problems with spring-run Chinook salmon in the Chehalis Basin:

“... Spring-run Chinook salmon in the upper basin experienced up to a ten-fold decline in adult returns between 2013 and 2019 (Ronne et al. 2020). A noticeable decline in spawner abundance during the usual spring Chinook spawning window meant that this decline was not entirely attributable to a concurrent change in field identification methodology (Ronne et al. 2020). Some estimates indicate that the potential of existing habitat to produce salmon has been reduced by as

¹ Page S-9 in the Summary; file named 'ChehalisSEPA_RevisedDEIS_Summary_20251120.pdf'.

much as 80% compared to historical conditions (ASEPTC 2014) due to the loss or degradation of aquatic habitats”². (underline added)

The last sentence is an all-important clue to some of the real problems faced by aquatic resources in the basin. The degradation of aquatic habitats can be laid, to a large extent, at the feet of the timber and allied industries. Prior to the arrival of wholesale logging, the thick covering of old growth timber that blanketed the landscape buffered rainfall and temperature effects. Big coniferous trees act as sponges, holding quantities of water in their branches and releasing that water much more slowly than clearcuts and ‘second or third growth’ trees. Very large woody debris created stable habitat in rivers and creeks. The tall trees with their shading properties also kept river and stream temperatures lower. Spring-run fish, which evolved to leave the ocean early and remain in rivers with cooler temperatures until late summer and early fall spawning, were likely spared from high ambient temperatures and frequent flooding from runoff. Compounding problems were the polluting mills which degraded water quality in Grays Harbor, reducing survival of outmigrant fish³. Now the shift to short rotation cycles by the logging industry has created a situation where aquatic habitat conditions are likely permanently altered, or at least for the long-term into the future.

The proposed facility is not going to offset these impacts and will likely make the impacts worse.

In contrast to all the negative impacts from the project, I note one of the main benefits of the Proposed Action appears to be reduction of flooding at the local airport:

“... The Applicant’s objective for the Proposed Action is to reduce flooding coming from the Willapa Hills and improve the levee protection level at the Chehalis-Centralia Airport”⁴.

Note that this is a reduction only; it doesn’t eliminate flooding. There will still be flooding, and presumably concomitant damage to facilities affected by the flooding. If flooding is going to happen anyway, rather than spend a lot of resources to protect the empty land that constitutes the bulk of the airport, a better approach might be to concentrate on protecting the built environment located as far away from the river as possible.

Looking at the alternatives overall, it strikes me that this DEIS is premature. The alternatives noted under Local Actions are, in part, dependent on the LAND concept. But these ideas haven’t been fully worked out yet:

² Page 11 in Appendix E, Fish Species and Habitats Discipline Report; file named ‘ChehalisSEPA_RevisedDEIS_AppxE_Fish_20251120.pdf’

³ An example are the many years of poor water quality due to pulp mill effluent in the estuary (Beverage, J.P. and M.N. Swecker. 1969. Estuarine Studies in Upper Grays Harbor Washington. U.S. Geological Survey Water-Supply Paper 1873-B; available at: <https://pubs.usgs.gov/wsp/1873b/report.pdf>) which likely impaired fish survival for decades (Schroder, S. and K. Fresh, eds. 1992. Results of the Grays Harbor Coho Survival Investigations, 1987-1990. Washington Dept. of Fisheries Tech. Rep. No. 118, Olympia, WA.; <https://wdfw.wa.gov/publications/01631>). While estuary conditions have improved in recent years, recovery is not complete as evidenced by the fact that inner harbor is closed to shellfish harvest (e.g., p. 39 in: The Watershed Company, BERK, and Coast and Harbor Engineering. January 2015. Shoreline Analysis Report for Shorelines in Grays Harbor County. Prepared for Grays Harbor County, Montesano, WA.; available at: <https://fortress.wa.gov/ecy/ezshare/SEA/SMP/GraysHarborCo/IAC.pdf>).

⁴ Page 7 in State Environmental Policy Act Revised Draft Environmental Impact Statement; file: ‘ChehalisSEPA_RevisedDEIS_20251120.pdf’

“... Project components of LAND are preliminary and conceptual, and there is a high level of uncertainty about the specific locations, extents, design, and associated impacts that would be expected from any of the project components. Therefore, impacts of components of the LAND program are not able to be examined with the same degree of detail in this EIS as the analysis of impacts of the Proposed Action.”⁵

Also, I note the following statement in the same document:

“... Detailed impact analysis in this EIS is limited by the current conceptual level of development of projects in the LAND program”⁶.

Thus, it’s difficult to make a complete and valid comparison between all the options. For this reason, and others I’ve noted, I think the proponents need to ‘sharpen their pencils’ and give the public and decision-makers a more nuanced and complete picture of what’s possible for the Chehalis Basin.

Thank you for the opportunity to comment on the Draft.



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⁵ Page 57, Appendix 1: Proposed Project Description and Alternatives; file ‘ChehalisSEPA_RevisedDEIS_Appx1_Alternatives_20251120.pdf’.

⁶ Page 61, Appendix 1: Proposed Project Description and Alternatives; file ‘ChehalisSEPA_RevisedDEIS_Appx1_Alternatives_20251120.pdf’.