



February 4, 2026

**SENT Via Comment Form:**

<https://admin.ecology.commentinput.com/?id=6U54ErkFW>

SEPA Revised Draft EIS for Chehalis Flood Damage Reduction Project  
c/o Bobbak Talebi  
Southwest Region Office  
P.O. Box 47775  
Olympia, WA 98504-7775

RE: Proposed Chehalis River Basin Flood Damage Reduction Project

Dear Mr. Talebi:

Since the great floods of 2007 and 2009, the Chehalis River Basin Flood Authority (Flood Authority) has worked tirelessly and in partnership with many others to implement fish and flood solutions across the basin. The Flood Authority knows very well that doing both (i.e., fish and flood) gets both (fish and flood); and that doing neither, or only doing one (fish or flood), gets neither or only one. Neither or only one is not good enough. The Flood Authority knows that the future for the basin is both robust aquatic species restoration/enhancement and robust flood hazard reduction. The Flood Authority and its thirteen member jurisdictions have adopted multiple resolutions<sup>i</sup> over the years since those great floods. These resolutions express support for basin-wide solutions for fish and flood that include rigorous and well-informed science-based analyses of options like the proposed Chehalis River Basin Flood Damage Reduction Project.

On the subject of the proposed Chehalis River Basin Flood Damage Reduction Project and the Washington Department of Ecology's Draft Environmental Impact Statement (DEIS), the Flood Authority offers the following for your consideration:

- 1. Executive Summary – Action Benefits/Impacts, No-Action Benefits/Impacts:**  
The DEIS is long. Many will only read the Executive Summary. As written, the benefits and impacts of action and no-action are not quickly discernable. Rather, they are to be inferred and extracted from the different narrative presentations contained in the document.

The Flood Authority believes the Executive Summary would benefit (and so would the public and future decision-makers) from a clear, easily accessible/readable, up-front summary (e.g., table?) comparing Action benefits and Action impacts against No-Action benefits and No-Action impacts. If the drafters of the Final EIS (FEIS) have this in mind as a final document production goal then invariably the final result will be a more balanced presentation of benefits and impacts for the public and regulatory decision-makers.

Currently the DEIS seems to predominately emphasize negative environmental impacts of the project, without adequately acknowledging the history of the project, protections that permitting will afford, and the environmental benefits of the project. What's more, the DEIS and Executive Summary do not present the very real impacts of no-action, as are described below.

2. **No Action and Significant Pollution Events:** The DEIS's analysis would benefit from acknowledging that no action brings with it the potential for significant pollution events and that the project and its basin-wide flood reduction effects could substantially reduce such future pollution events. Consider the Chehalis Floods of 1986:

*“The flood led to a contamination cleanup at a closed industrial site, known as American Crossarm and Conduit, near [Millett Field](#). The inundation caused a spillage of approximately 10,000 US gallons (38,000 L; 8,300 imp gal)<sup>[88]</sup> of a mixture of creosote, diesel fuel, and chemicals used in the treatment of lumber which spread into the surrounding neighborhoods as well as the Dillenbaugh Creek watershed. Cancer-causing compounds such as [dioxins](#) and [pentachlorophenol](#) were included in the spill.<sup>[88][89]</sup> The remediation was undertaken by the [Environmental Protection Agency](#) (EPA) and was listed in 1988 as a [federal superfund site](#).<sup>[90]</sup> The \$9.5 million hazardous cleanup project was not completed until 1996.<sup>[91]</sup>”* [See [https://en.wikipedia.org/wiki/Flood\\_history\\_in\\_Chehalis,\\_Washington](https://en.wikipedia.org/wiki/Flood_history_in_Chehalis,_Washington).]

3. **No Action and Significant Salmonid Impacts:** Also, consider this last round of atmospheric rivers event and the effect on Western Washington salmonids. Here are two recent articles:

- Flood's impact on salmon will be felt for years, warns WDFW -- <https://www.cascadiadaily.com/2025/dec/18/floods-impact-on-salmon-will-be-felt-for-years-warns-wdfw/>.

- ‘Severe Impacts On Salmon’ Anticipated From Record-setting Washington Floods: WDFW -- <https://nwsportsmanmag.com/severe-impacts-on-salmon-anticipated-from-record-setting-washington-floods-wdfw/>.

Unregulated floods can and do have impacts on fish, the natural environment, the built environment, underserved populations, and public services. It would benefit the FEIS (document and process) if this were acknowledged and explained.

- 4. Mitigation:** The DEIS does not conclude the proposed project presents any unmitigable environmental impacts, but rather states “the decision regarding whether mitigation is feasible and meets the regulatory requirements would be determined during the permitting processes by the permitting agencies” and when the project is at 70% or more design versus today’s only conceptual design (see page S-12, Ecology DEIS Summary Publication No. 25-06-008).

The Flood Authority sees this as a very important statement and essential to the DEIS analysis, and as such should be stated up front in the Executive Summary so as to manage expectations for what the DEIS is and is not and the role in the process it serves, e.g., information discovery and information surfacing for the benefit of the public and future decision-makers. It is and will be the permitting process that will ultimately determine what impacts are unavoidable and what impacts can be constrained. The project cannot proceed without permits. Permits cannot be issued if there are unavoidable impacts and if impacts cannot be mitigated.

- 5. VIDEO:** The project proponent’s video (<https://www.chehalisriverbasinfozd.com/>) showing how the proposed flow through dam will operate is a very informative presentation that should be brought forward in the description of the project and made available to the public and decision-makers. The video, coupled with the narration, substantially enhances understanding of what the project is and is not (which is after all the goal of such documents as the DEIS and future FEIS).

Lastly, when commenting on the initial DEIS for the proposed Chehalis Flood Damage Reduction Project<sup>ii</sup>, the Flood Authority stated its view that the institutional and governance capacity existed in the Basin to identify and implement “technically feasible and economically practicable” mitigation as required. The Flood Authority still holds this view, and knows that the many experts currently engaged in the project, across multiple disciplines, have collectively the capacity, knowledge, and know-how

to design, develop, and operate a state-of-the-art project without causing unmitigable environmental impacts and harm to our basin's cherished environment.

Our comments and statements above are offered in the hope that as the DEIS is finalized (into a FEIS) it will provide the balanced presentation of benefits and impacts from action and no action that the public and decision-makers need (and will need). We, like Ecology, wish to see that the FEIS serves a future role as a helpful, informative resource.

Thank you for the opportunity to share our perspective on this important document. We, like you, seek on a daily basis to balance projects and decision-making for the benefit of citizens, businesses, fish, and local, state, and tribal interests. Please feel free to contact either of us if you have any questions. You may also contact Scott Boettcher (Flood Authority staff) at 360/480-6600, [scottb@sbgh-partners.com](mailto:scottb@sbgh-partners.com).

Sincerely,



Edna Fund, Chair  
Chehalis River Basin Flood Authority  
Lewis County Representative  
360/269-7515  
[dutch@localaccess.com](mailto:dutch@localaccess.com)



Brian Shay, Vice-Chair  
Chehalis River Basin Flood Authority  
City of Hoquiam Representative  
360/581-3815  
[bshay@cityofhoquiam.com](mailto:bshay@cityofhoquiam.com)

CC: Jeff Zenk, WA State Office of Chehalis Basin  
Chehalis River Basin Flood Authority members  
Chehalis Basin Board members

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i. Chehalis River Basin Flood Authority is comprised of thirteen representatives from Lewis County, Grays Harbor County, Thurston County and the following cities and towns: Centralia, Chehalis, Napavine, Pe Ell, Aberdeen, Cosmopolis, Hoquiam, Montesano, Oakville and Bucoda. See resolutions of support in the Flood Authority's Local Resolutions Library at [https://www.ezview.wa.gov/site/alias\\_1492/37643/local\\_resolutions.aspx](https://www.ezview.wa.gov/site/alias_1492/37643/local_resolutions.aspx).

ii. See 4-21-2020 comment letter in the Flood Authority's Local Resolutions Library at [https://www.ezview.wa.gov/site/alias\\_1492/37643/local\\_resolutions.aspx](https://www.ezview.wa.gov/site/alias_1492/37643/local_resolutions.aspx).