

When it comes to building the flood retention facility (FRE) as part of the Chehalis River Basin Flood Damage Reduction Project, I strongly oppose and ask that you consider alternate methods (discussed below). The Chehalis River, which is the mainstem of the second largest river basin in the state of Washington, is an extremely important habitat for several threatened and endangered species, including anadromous fish and amphibians. It should also be noted that this particular river is one of the last major rivers on the entire west coast that has not been altered with a dam (Western Rivers Conservancy 2020). This community should be proud to have such a river flowing right through it, and want to work to improve its quality, not degrade it even further (as the EIS states the project will do). Too many west coast rivers have fallen victim to expensive dams, many of which are outdated and cost more to keep up in the long run than it would to remove them (Pacific Rivers n.d.). One example of this is the Lower Snake River Dam, which can be 60% less expensive to remove than to maintain over a 30-year period. This plan seems outdated considering the number of current projects to remove dams in order to restore anadromous fish populations to their previous glory.

Consider what NOAA has said about the effects of dams on water and habitat. Dams, and yes this facility is a dam, alter fish habitat by creating huge reservoirs that anadromous fish are not used to, they reduce natural flow, can raise temperatures to lethal levels, mix in unhealthy amounts of nitrogen, lower oxygen levels from eutrophication (increase in algae that disrupt nutrient and oxygen levels), and retain toxic substances that could settle behind the dam (NOAA, 2024). Within the environmental impact statement (EIS) of your proposal, it says “Reduced fish passage, degraded habitat, and mortality caused by rerouting the river around the FRE facility site through the bypass tunnel would have a significant adverse impact on salmon and steelhead,” which shows that you’re fully aware of the damage you would cause to this highly sensitive habitat, and to several species whose numbers have been significantly declining over the past century. According to an article from Oregon Public Broadcasting, California Department of Fish and Wildlife

found that the bypass tunnel at The Iron Gate Dam killed over 830,000 juvenile salmon in a week due to gas bubble disease brought on by the pressure changes associated with the dam (Neumann, 2024). You can also refer to the disastrous Winchester Dam Repairs in 2023 that killed over 550,000 Pacific Lampreys (Johnson, 2025). Aside from the bypass tunnel, the EIS says that the construction of and the completed, operational project will have “significant adverse impacts on fish, wildlife, aquatic and terrestrial habitat, recreation, earth, water, transportation, wetlands, land use, Tribal resources, cultural resources, environmental health and safety, environmental justice, and public services and utilities. All of which can be avoided by not constructing this facility on the river.

The best alternate method to consider would be, as mentioned in the EIS, to halt development in the flood plan, restore water retaining wetlands, buy out and relocate at risk properties, and rerouting I-5. These steps would mitigate damage caused by floods by removing at risk infrastructure from flood prone areas. Wetlands are extremely helpful ecosystems when it comes to a reduction in flooding. A single acre of a wetland can hold about a million gallons of water. (Environmental Protection Agency, 2006). With that kind of water retention, and with the return of natural trees and vegetation to the wetlands, the risk of a catastrophic flood will be significantly reduced, and two important ecosystems will be saved. I suggest as wetlands are getting restored, to also restore the beaver population, as these animals are ecosystem engineers. According to a study by Puttock et al. (2021), the reintroduction of beavers into wetland sites significantly reduce the “flashiness” and impacts of flood events. This method of storing water would be natural, last indefinitely, and cost significantly less than the proposed \$2.5 dollars to construct the facility (not considering regular maintenance, repairs, and operation), which has only been guaranteed for the next 60 years (what happens after 60 years? How much will that cost?).

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