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Submitted via Electronic Mail
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NEPA Draft EIS for the Proposed Chehalis River Basin Flood Damage Reduction Project
c/o Anchor QEA
6720 South Macadam Street, Suite 125
Portland, OR 97219

Subject: Comments on NEPA Draft EIS for the Proposed Chehalis River Basin Flood Damage Reduction Project

To Whom It May Concern,

On behalf of Weyerhaeuser Company, please accept these comments on the Draft Environmental Impact Statement (DEIS), dated September 18, 2020. We appreciate the level of effort that the US Army Corp of Engineers undertook to prepare the DEIS and its appendices and the opportunity to comment on this work. We have previously submitted similar comments to the Washington Department of Ecology under Washington's State Environmental Policy Act related to this Project.

Weyerhaeuser, like other forest products companies in Washington, is significantly invested in protecting Washington's native fish, other aquatic species, and water quality, through our sustainable forestry practices and compliance with Washington's Forest Practice Act, which is one of the largest and most comprehensive pieces of environmental legislation in the United States. We expect that other commenters will reiterate their concerns regarding the proposed Project's adverse impacts to these and other elements of the environment and the uncertainty and infeasibility of mitigating these impacts. In the interest of ensuring the most complete information is presented on the proposed Project, in the event that it proceeds in some fashion, we provide these comments on some of the unique impacts to Weyerhaeuser that the Project presents.

Weyerhaeuser has been operating in the Chehalis Basin for more than a century, and today we still own nearly 330,000 acres of land in the basin. Hundreds of our employees and contractors live and work in communities throughout the area, and our people keenly understand the devastating impacts floods can have on lives, homes, businesses and local economies. Many of our employees lived through the catastrophic 2007 flooding, and we are deeply invested in managing these forests safely and sustainably for generations to come. We are equally committed to being good neighbors and strong community partners, and we fully appreciate the state's interest in evaluating actions to reduce the potential damages from flooding. We also applaud the Chehalis River Basin Flood Control Zone District's effort to evaluate alternatives to address these issues, and we will continue working collaboratively with local and state governments, Tribes and other stakeholders to address the impacts of flooding on our communities.

The proposed Project is an expandable flood control dam.¹ The dam is designed to be a flood retention facility with a temporary reservoir that will remain open for water to flow through except during certain major flood conditions. During these events, the dam will be closed, and water will pool in an inundation area behind the dam.

The dam site and the inundation area are commercial forestland presently owned by Weyerhaeuser as part of its Pe Ell tree farm, which in total encompasses almost 185,000 acres. The proponent will acquire the land from Weyerhaeuser; the proponent does not intend to manage the land as commercial forest.

Construction of the dam will occur over a five-year period and utilize a construction and staging laydown areas that are also owned by Weyerhaeuser. Extensive quarries will be developed to provide rock for construction of the facility. The quarry sites are owned and rock from those quarries are used by Weyerhaeuser to construct, repair, and maintain forest roads.

We reiterate the impacts unique to Weyerhaeuser below, which must be evaluated before decisions regarding this Project can be made. They include:

- **The extent of the inundation area and its impact.** The inundation area will result in approximately 700 additional acres of area that will no longer serve as commercial forest. The inundation area and adjacent buffer will also create isolated inoperable parcels of timber that become “stranded.” This will result in additional acres that will no longer serve as commercial forest.
- **Impacts to the forest road network that serves the Pe Ell tree farm.** The inundated road segments will not be easily restored to their present state (forest roads capable of supporting log hauling) post-flooding. None of the existing roads or road structures are designed to be submerged, and flooding events will likely damage or destroy existing structures such as bridges, bridge foundations, road approaches, pipe structure, as well as the forest roads. These structures and roads will need to be reconstructed after every flood event or, in some cases, relocated altogether.
- **Impacts to Weyerhaeuser’s forest road transportation network.** The dam and inundation area will be constructed over the main haul road that serves Weyerhaeuser’s southern Pe Ell tree farm. This road provides main line access to almost 26,000 acres of the tree farm along a relatively flat route. It is constructed and maintained as the major road “artery” that accommodates significant truck volume. The dam will eliminate Weyerhaeuser’s use of this road. In turn, Weyerhaeuser will need to invest in a new road network – design and construction – that will necessarily be built over steep hills and secondary roads (i.e., not presently designed to handle the same volume of traffic as the main line). Use of this haul-disadvantaged route will lead to increased haul distances, additional wear and tear on the trucks, longer drive times, increased fuel consumption, and substantially and permanently increase costs to Weyerhaeuser.
- **Impacts to Weyerhaeuser’s transportation network during construction.** The dam structure and construction lay down area will be built over Weyerhaeuser’s main haul road. During the five-year construction phase presently contemplated, it is unlikely that Weyerhaeuser will be able to continue to use the main road (or any roads) where construction will occur because of traffic congestion and safety risks that the significant increase in traffic will cause.

¹ The proposed Project also includes changes to the Chehalis-Centralia airport levee. These comments are directed to the dam portion of the Project only.

- **Incompatibility of dam construction and operation with existing use.** The Project will require activities, such as rock pit development (for dam construction, the dam structure, concrete plant, and the flood containment reservoir), that are incompatible with forest operations under the forest practice regulations. This will require reclassification (rezoning) of these areas under the process provided for in the forest practice rules. For instance, the development of quarry sites for dam construction will need to proceed through the appropriate county and state permit processes (in this case, through Lewis County) because they would be commercial rock pits not intended for forest practices to support the Pe Ell tree farm. In addition, these sites and the related infrastructure (for instance, roads) will be subject to non-forest practices regulatory requirements after development.

As other comments have noted, the proposed Project will address only some of the impacts of flooding in the Upper Chehalis area, and would not address other areas in the Chehalis Basin, such as South Fork Chehalis, Newaukum, Skookumchuck, and Elk Creek. The Project also would not address flood events such as those that occurred in 2007 or 2009. The acknowledged limitations of the proposed Project, in combination with the impacts identified in the DEIS, particularly those impacts to native fish and aquatic species, habitat, and water quality, and described in the comment letters, including this letter, must be fully considered by decision makers when determining whether to proceed with a project of this magnitude and cost.

We appreciate the opportunity to provide these comments.

Regards,

Kevin Godbout
Director, Timberlands Environmental Support