



February 2, 2026

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COMMENTS POSTED

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Subject: State Environmental Policy Act Revised Draft Environmental Impact Statement for the Proposed Chehalis River Basin Flood Damage Reduction Project

Dear Mr. Talebi:

On behalf of the Cowlitz Indian Tribe, thank you for the opportunity to comment on the State Environmental Policy Act (SEPA) Revised Draft Environmental Impact Statement (DEIS) for the Proposed Chehalis River Basin Flood Damage Reduction Project. Our comments below emphasize process concerns, opposition to the proposed dam on the Chehalis River (described as a “Flood Retention Expandable (FRE) facility” in the DEIS), and the need for more time and investment in development of integrated, non-dam solutions to reduce flood damage.

The Cowlitz Indian Tribe (Tribe) is a Federally recognized Indian Tribe of southwest Washington and northwestern Oregon. As the Department of Ecology (Ecology) is aware, the DEIS covers areas in our homelands in what is now Lewis County, Washington. Since Time Immemorial, our people have hunted, fished, and gathered across this dynamic landscape, following a strategic seasonal round of resource acquisition. Healthy, harvestable populations of fish, wildlife, and plants are central to our culture, identity, and the survival of our people. As an integrated part of our traditional lifeway, we have attached religious and cultural significance to properties throughout Lewis County.

The DEIS evaluates three alternatives: a Proposed Action focusing on construction and operation of a FRE facility and temporary reservoir on the Chehalis River and modified levees around the Chehalis-Centralia Airport, a more rudimentary Local Actions Alternative, and a No Action Alternative. The Tribe strongly supports goals of reducing flood damage and improving community resilience to climate change in the Chehalis Basin, but we oppose the proposed FRE facility as the solution. The DEIS identifies significant adverse impacts, critical uncertainties, and limitations of the Proposed Action. While the DEIS lacks some key

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information and analysis needed for informed decision-making, it is already clear that the proposed dam would result in irreparable harm to Tribal natural and cultural resources. For these reasons, we cannot support the Proposed Action, and we urge the Washington Department of Ecology (Ecology) to focus more time and investment in the development of non-dam alternatives that will better protect Chehalis Basin communities and ecosystems. This letter summarizes our concerns, with additional comments provided in the enclosed matrix.

Lack of Completed Traditional Cultural Places Studies

One of our leading concerns is the fact that Ecology moved forward with this DEIS without the completion of required Traditional Cultural Places (TCP) studies. This gap means the DEIS does not fully analyze impacts to either cultural resources or Tribal resources. Ecology should not finalize the EIS or use it as a basis for decision-making until these studies are complete and incorporated. This will require enhanced coordination with the U.S. Army Corps of Engineers (USACE) and continued, meaningful engagement with Tribes. USACE is handling the TCP studies for both Ecology's DEIS under SEPA and USACE's separate but closely related DEIS under the National Environmental Policy Act. Because of this Federal nexus, the actions contemplated under this DEIS are also subject to compliance with Section 106 of the National Historic Preservation Act.

Significant Adverse Impacts

The DEIS states that “[c]onstruction and operation of the proposed project would 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” (p. S-9). We are particularly concerned about potential impacts to culturally, ecologically, and economically important species such as salmon and steelhead. These anadromous fish are vital to the Cowlitz and other area Tribes, and they are facing increasing threats due to climate change.

While the Chehalis Basin is one of the few watersheds in Washington without Endangered Species Act-listed salmonids (except for bull trout), the addition of a dam could quickly change that. According to the DEIS, the FRE facility would adversely affect salmonid abundance, productivity, spatial structure, and diversity. It would reduce fish passage, harm water quality and quantity, disrupt habitat-forming processes, reduce prey availability,



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benefit non-native predatory fish, create construction noise and disturbance, and otherwise degrade aquatic habitat. Model results indicate that all salmonid species in the project vicinity would decline by large percentages during the 4-6-year FRE facility construction period, with further declines to follow during FRE facility operation (to the point of complete extirpation for some runs). This is not acceptable. Now is the time to increase investments in aquatic species restoration and ecosystem resilience, not undermine those efforts with a dam.

Uncertain or Inadequate Mitigation

Another concern is that the DEIS fails to discuss meaningful mitigation measures. This omission leaves open the possibility of unmitigable adverse effects to TCPs, archaeological sites, and a host of natural resources. The DEIS repeatedly emphasizes “uncertainty around whether mitigation is technically feasible or economically practicable.” Further, the Washington Department of Fish and Wildlife’s evaluation of the Applicant’s Proposed FRE Mitigation Plan for aquatic species and habitats identifies a “lack of clear demonstration of ecological lift and functional gain from these activities and key deficiencies in the magnitude of mitigation proposed, temporal loss compensation, adaptive management, and long-term habitat protection” (Appendix E, p. 171).

Need for Alternative Solutions

The Proposed Action relies on structural solutions—a dam and levees—while ignoring broader land-use practices and other factors that contribute to flood risk. The DEIS acknowledges that even under the Proposed Action, flood risk is not eliminated, and “many areas would remain flooded to some extent” during major and larger floods (p.59). This signals that more time and resources are needed to develop integrated, non-dam solutions that can proactively mitigate flood impacts and create more resilient communities in the face of climate change. The Local Actions Alternative is a step in the right direction as it seeks to reduce flood damage through a combination of options that local governments and agencies could choose to implement, such as components of the Chehalis Basin Strategy Local Actions Non-Dam (LAND) alternative program, land use management, floodproofing, buyout or relocation of at-risk properties or structures, floodplain storage improvement, and erosion management.

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Conclusion

The Cowlitz Indian Tribe opposes the Proposed Action and recommends that Ecology focus efforts to address flood damage on further development of non-dam alternatives. A true solution requires an integrated basin-wide strategy, as envisioned by the legislation authorizing the formation of the Office of the Chehalis Basin. Continued, meaningful consultation with Tribes will be critical as environmental and cultural review processes proceed.

Thank you for considering our comments. For questions concerning this letter, please contact Christina Donehower, Natural Resources Policy Analyst, and Sean Hess, Cultural Resources Policy Analyst. Christina can be reached at cdonehower@cowlitz.org or (360) 506-1848, and Sean can be reached at shess@cowlitz.org or (360) 846-8923.

Sincerely,

COWLITZ INDIAN TRIBE


Bill Iyall (Feb 2, 2026 08:12:48 PST)

William B. Iyall, P.E.
General Council Chairman

Enclosure: Comment Matrix

cc: Dr. Allyson Brooks, Washington State Historic Preservation Officer
Lance Lundquist, Archaeologist, USACE

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Final Audit Report

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