

SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project

c/o Bobbak Talebi

Submitted electronically via: <https://admin.ecology.commentinput.com?id=6U54ErkfW>

February 4, 2026

Dear Bobbak Talebi, and other DEIS reviewers,

Thank you for the opportunity to provide comments on the Proposed Chehalis River Basin Flood Damage Reduction Project (Project) draft Environmental Impact Statement (DEIS). My name is Teri Wright and I am a resident of Washington state. I am also an advocate for forests, salmon, and Southern Resident killer whales.

I am opposed to this project for several reasons, including;

- the amount of habit degradation and destruction;
- the destruction of species unable to move to another location during construction and operations of the proposed project;
- the likelihood of wildlife corridors being permanently altered and destroyed;
- the initial cost to build this dam, which does not include the millions of dollars already spent doing study after study to determine the feasibility of the project;
- the ongoing costs of operations, which has not been disclosed – who will pay for this dam once built - all Washingtonians and Americans via taxes paid to WA state coffers and the IRS, and yet the number of people who benefit are few compared to the many bearing the cost.

I am confused that the DEIS did not evaluate the Local Actions Non-Dam Alternative separately instead of accepting that the Flood Control Authority usurped some of the identified actions. Pg. 6 of the DEIS states,

The Local Actions Alternative represents a local approach to reduce flood damage in the Chehalis-Centralia area. This alternative is not the same as the Local Actions Non-Dam (LAND) Alternative being evaluated in the Chehalis Basin Strategy; however, some LAND elements have been included.

On July 22, 2020, Governor Inslee ordered a pause on the EIS process regarding the proposed dam, and instead, he ordered the Office of Chehalis Basin, the Department of Ecology, and the Department of Fish and Wildlife to work together using “funding available within the Office of Chehalis Basin budget to assist the Board in the development of a non-dam alternative.” That process was completed and resulted in the Local Actions, Non-Dam Alternative, which can be found [here](#), [here](#), and [here](#). Since Washingtonians paid for this project to be developed per then Governor Inslee’s direct order, it should have been included in this DEIS. The fact that it is not should make the current DEIS process null and a new one should begin and should include the proposed LAND alternative.

It would be better for all concerned, the people who reside and work in the Chehalis Basin, and the myriad flora and fauna that also call the basin home, to not build a dam that will only safeguard some homes and businesses, and instead spend this money on getting people out of the floodplains, raise existing structures, and change building and zoning regulations to prohibit future building in the floodplains.

My intent for the remainder of my comments was to focus on the specific effects the Project will have on forests in the Chehalis Basin, Chinook salmon in the Chehalis River and the tributaries, and the impact on the recovery efforts of the critically endangered Southern Resident killer whale (SRKW) population should this project move forward. I am instead using your own comments to state clearly that this DEIS should not have been compiled. Reading through it carefully, I am struck with a sense of Déjà vu, which is acknowledged by your assessment found on page S-20:

Areas of uncertainty or controversy associated with the Revised Draft EIS include the following:

- There is uncertainty around whether the proposed mitigation is technically feasible or economically practicable; therefore, the Proposed Action would have **significant and unavoidable** adverse environmental impacts on the environment as shown in Exhibit S-6. The Applicant has prepared draft mitigation plans. If the agencies determine the plans meet regulatory requirements and the implementation is feasible, then some impacts would be decreased as part of the permitting processes.
- To date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the unique impacts on Tribal and cultural resources to a level that is less than significant. More detailed studies and review—including identification of specific impacts and mitigation measures and Government-to-Government consultation—would be conducted during the permitting processes, before implementation of the proposed project.
- Federal NEPA evaluation, Section 106 consultation, and Endangered Species Act consultation timeframes and outcomes are unknown.
- The Applicant has not provided an operations plan for the revised dam design and location so the analyses conservatively rely on the operations plan prepared for a previous dam design and location.
- Because the project is at a conceptual level of design, specific details such as construction means and methods, quarry operations, management of excavation overburden and stockpiles, and material disposal are not fully defined. Therefore, the Revised Draft EIS uses assumptions for these considerations in the analyses. This uncertainty could be reduced as the Applicant's design is refined and through the permitting process.
- Many of the analyses presented in the Revised Draft EIS rely on models to estimate potential environmental effects. As with all models, the assumptions, input data, and methods affect model outcomes.
- Modeling and analyses in the Revised Draft EIS were strengthened to include a larger range of potential future conditions. The analysis was based on use of best available information, current science, and evaluation of a range of future conditions. The actual effects of climate change on hydrology, temperature, and ecosystem processes will depend on ongoing actions and decision-making. However, it is anticipated that

changing climate conditions would not substantially alter the impact determinations in the EIS.

- The long-term effectiveness of the Applicant's proposed fish passage facilities and their interactions with different life stages and species are unknown.
- There are differing perspectives regarding the underlying causes of flooding, flood damages, and solutions in the Chehalis Basin. These include discussions about the influence of forest practices, land use practices, and whether flood control infrastructure could alter development patterns or encourage building in flood-prone areas.

It is well understood the interconnections and interdependencies between forests, salmon, and the Southern Resident killer whales. The Chehalis River meets the ocean via Grays Harbor. Grays Harbor is located within the critical habitat of the SRKW, which boundaries are Southeast Alaska through Northern California. In the spring of 2025, 31 independent experts from around the globe met to discuss the plight of the SRKW and to craft a plan of recovery options.

**Strengthening recovery actions for Southern Resident killer whales** is the result. In addition to reviewing the plan, I urge the DEIS reviewers to also avail themselves of two books that are germane to saving forests, salmon, and SRKW. The first is *Managed Extinction: The Decline and Loss of Wild Salmon and Steelhead in the Pacific Northwest* by Jim Lichatowich and Rick Williams; and the second is *Canopy of Titans: The Life and Times of the Great North American Temperate Rainforest* by Jessica Applegate and Paul Koberstein. Reading and understanding these resources will guide you to a better analysis of a completed *Application* from the *Applicant* when it is finished and submitted. You must require this. Otherwise, this whole project will go down as an egregious sham perpetrated upon Washingtonians and paid for with all Americans' tax dollars.