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

RE: Chehalis River Basin Flood Damage Reduction Project

Dear Bobbak Talebi,

On behalf of Orca Conservancy, we submit this letter in strong opposition to the proposed Chehalis River dam project. While we recognize the importance of reducing flood risk and protecting communities in the Chehalis Basin, the proposed dam would cause significant and irreversible harm to salmon populations, Southern Resident killer whales, and the broader river ecosystem without providing a durable or climate-resilient solution.

The Chehalis River is one of the most important remaining Chinook salmon producing watersheds in Washington State that has not been extensively impounded. Chinook salmon from this basin contribute to the prey base relied upon by the endangered Southern Resident killer whales (SRKWs). Any action that degrades salmon habitat or reduces salmon survival directly undermines Washington State's substantial investments in salmon recovery and conflicts with established state and federal conservation priorities.

Southern Resident killer whales are listed as endangered under the federal Endangered Species Act (ESA) and remain at critically low population levels. State and federal science consistently identifies prey limitation, specifically the insufficient abundance, size, and seasonal availability of Chinook salmon, as the primary factor limiting SRKW survival and recovery. The National Marine Fisheries Service's (NMFS) Southern Resident Killer Whale Recovery Plan and subsequent status reviews emphasize that preventing further degradation of Chinook-producing watersheds is essential to avoiding further population decline and achieving recovery objectives.[1]

Construction and operation of a large flood control dam on the Chehalis River would fundamentally alter natural river processes, including flow regimes, sediment transport, temperature conditions, and habitat connectivity that are essential to sustaining productive Chinook populations. Extensive evidence demonstrates that large dams, even when paired with mitigation measures, consistently result in long-term reductions in salmon productivity and life-history diversity.[2] Any reduction in Chinook survival, size, or timing from the Chehalis Basin would further exacerbate prey limitation for Southern Resident killer whales.

These impacts must be evaluated in the context of cumulative effects, as required under the State Environmental Policy Act (SEPA). Southern Resident killer whales are already subject to multiple, interacting

stressors, including reduced prey availability, vessel disturbance, and contaminants. Incremental losses of Chinook salmon from a major watershed add to this cumulative burden and are biologically meaningful.[3] SEPA requires agencies to consider whether a proposed action contributes to significant adverse environmental impacts when combined with existing stressors, particularly for listed species and degraded ecosystems.

The proposed dam also raises concerns under Washington State's Clean Water Act Section 401 Water Quality Certification authority. Large dams are known to degrade downstream water quality by altering temperature regimes, dissolved oxygen levels, and sediment dynamics, all of which directly affect salmon habitat quality. Approval of a project that results in ongoing water quality impairment or undermines designated uses - including aquatic life and salmonid migration - would be inconsistent with state water quality standards and anti-degradation requirements.

In addition, the proposal conflicts with Washington State's policy commitments to SRKW recovery. The Governor's Southern Resident Killer Whale Task Force (Task Force) explicitly identified protection and restoration of Chinook salmon habitat as the highest priority action for SRKW recovery and cautioned against new infrastructure projects that further reduce salmon abundance or resilience.[4] Washington agencies have since made significant public investments in salmon habitat restoration, dam removal, and flow restoration specifically to benefit Southern Residents. Approving a new dam that predictably diminishes salmon productivity in a key watershed would undermine these coordinated recovery efforts and contradict the Task Force's recommendations.

As the state agency charged with protecting water quality, aquatic resources, and ecological integrity, the Washington Department of Ecology has a responsibility to ensure that its decisions are consistent with SEPA, state water quality standards, and Washington's orca and salmon recovery frameworks. Flood risk reduction strategies that result in long-term impairment of salmon habitat are incompatible with these obligations.

Rather than pursuing a high-cost structural project that sacrifices ecosystem health for uncertain flood control benefits, we urge the Department of Ecology (Ecology) to prioritize proven, lower-impact alternatives that protect both communities and fish populations. These include floodplain restoration and reconnection, strategic setback levees, targeted property buyouts and relocation assistance, restoration of upstream wetlands and forests, and modernized flood warning and emergency preparedness systems. These approaches are more adaptable to climate uncertainty, more cost-effective over the long term, and aligned with Washington's legal and moral obligations to protect endangered species.

For these reasons, we strongly encourage Ecology to reject the proposed Chehalis River dam and instead advance integrated flood risk reduction strategies that safeguard human communities while preserving the ecological integrity of the Chehalis River and the species that depend on it.

Thank you for the opportunity to comment. We appreciate your consideration and urge you to choose solutions grounded in science, state policy, and long-term stewardship responsibilities.

Sincerely,

Shari L. Tarantino

Shari L. Tarantino
Executive Director

Citations

1. National Marine Fisheries Service. *Southern Resident Killer Whale Recovery Plan*. NOAA, 2008; see also NMFS. *Southern Resident Killer Whale Status Review Update*. 2020–2023.
2. National Research Council. *Upstream: Salmon and Society in the Pacific Northwest*. National Academies Press, 1996; NMFS. *Biological Opinions addressing effects of dams on salmonid survival*, multiple years.
3. NMFS. *Effects of Prey Availability on Southern Resident Killer Whale Recovery*. Supporting analyses for vessel regulations and ESA consultations, 2019–2023.
4. Governor's Southern Resident Killer Whale Task Force. *Recommendations and Priority Actions*. State of Washington, 2018; see also Washington State Orca Recovery Plan implementation documents.