

Conservation Northwest
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RE: Public comment on DEIS for the Proposed Dam on the Chehalis

First, we would like to express our appreciation for this opportunity to weigh in on such a huge issue. Conservation Northwest is dedicated to supporting ecological restoration and sustainable flood mitigation for the Chehalis Basin. We recognize the effort and commitment to draft a viable DEIS and are grateful for the hard work of the Department of Ecology during this time. However, we feel there are still too many long-term, negative consequences for erecting a dam in the headwaters of the Chehalis River.

General Comments/Questions

We still have questions about soil stability at the construction site. We have heard that it will potentially be a floating dam due to unstable soils – is that true? What steps will be taken to ensure the dam does not collapse or sink?

The dam has increased in size since the last DEIS, as well as the cost. Without mitigation, the dam could cost around 1 billion dollars and with mitigation it could be twice that cost. This makes the dam much more expensive, whereas the concept of raising I-5, which was deemed cost prohibitive. Wouldn't the FRE (with designs, engineers, construction and mitigation) be more cost prohibitive than the raising of I-5?

The lack of viable alternative analysis is still a concern. How will this be addressed?

This project seems to only have an impact on flood waters if the flood comes out of the Chehalis. Are there plans to address flooding from other tributaries such as Skookumchuck and Newaukum?

During the site preparation and pre-construction period, extended excavation will be required. How does that relate to the anticipated construction duration and length of the in-water work window? How would the excavated sites be stabilized? How much of the area would be dewatered? How would the river flow be managed for the health of fish and wildlife during this period of time?

If options from the LAND work are adopted in tandem with the dam, shouldn't those concepts be analyzed with the dam if they are used with the dam, are they not a part of the same project? Much like the levees around the airport, we have concern about the way portions of this project have been bundled. Why is the airport levee attached to the dam's construction?

Environmental Concerns

How will the dam impact the ability for species to evolve and adapt to climate change, including habitat connectivity and decreased genetic opportunity? What type of fencing will be installed around the construction site and dam? What is the height, length, breadth and duration of fencing around the project site?

Some issues cannot be mitigated no matter how much money is spent. For example, habitat connectivity and migratory routes cannot be made somewhere else, the temporal and spatial thresholds are rigid, and the corridor cannot be recreated in some other landscape as this connection will be lost. What plans have been developed to actually mitigate for the fragmenting of habitat? This is such a critical component of healthy habitats that we see this as a non-starter for a dam.

The same is true for spawning grounds for fish and salmon. The loss cannot be mitigated for, and the construction alone will cause serious harm to the ecological systems that maintain a healthy Basin. How could this possibly be accounted for?

A more permanent and larger dam will create a larger reservoir which will change the current habitat and the species that migrate into and out of the area. What will be done to analyze this impact?

The plan appears to be to change the current conifer tree community into more historical riparian vegetation. However, the time required for those changes to take place, following the construction window means there will be species loss, habitat degradation and disruption long before the change is complete. How will this shift from conifer tree community to clearcut and dam construction be made fast enough to not cause more problems? Water temperature is a huge issue in the Chehalis as our waters are warming – won't this increase the temperatures in the headwaters which are currently refugia for fish and wildlife during summer months and periods of low-flow?

The current habitat around the dam site has been there for many years now, and species have adapted to the current environment. How will species that use the current corridor be given opportunity to disperse, especially if they have a small range which a dam could cut off permanently?

The large footprint of the dam will create a massive difference in how compact the soil is under the structure. How will this impact species that rely on subsurface soils for daily or seasonal needs?

There will be significant changes to the area related to changes in daylight that reach the forest floor. How will this impact species within and without the available light?

The construction of such a structure will create at minimum temporary and more likely permanent displacement for some species of flora and fauna. Which species will have temporary displacement versus those that will not return to the site for generations - if ever?

Alternatives Analysis Inadequate

DOE was receptive to comments received on the draft EIS questioning the adequacy of the alternatives analysis by including some broad considerations of several components of the Local Actions Non-Dam (LAND) Alternative being evaluated in the Chehalis Basin Strategy in the 2025 DEIS (DEIS Section 2.5.1, page 28). Critically, inclusion of some LAND elements in the DEIS as part of a viable alternative to the FRE and airport levee changes, is clear acknowledgement that a less environmentally harmful method to accomplish the FCZD's flood damage reduction project (both project purpose and objective) is viable. However, questions remain regarding the overall adequacy of alternatives analysis per SEPA process requirements.

Failure to follow WAC 197-11-940

DOE's analysis in the 2025 DEIS is unchanged from the 2020 DEIS, focusing on the applicant's statement of purpose and goals and failing to explicitly consider the degree to which implementing the proposed project would foreclose future options for succeeding generations as specified in WAC 197-11-440 part 5, subparts b and c(vii):

WAC 197-11-440 EIS Contents, part 5 Alternatives Including the Proposed Action, subpart (b): Reasonable alternatives shall include actions that could feasibly attain or approximate

a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation.

(c)(vii) Discuss the benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time. The agency perspective should be that each generation is, in effect, a trustee of the environment for succeeding generations. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal.

By not fully considering the possibility of foreclosing on future options for the suite of ecosystem services provided to the community by the free-flowing river, DOE has failed to provide decision makers with a comprehensive understanding of the scale, extent, magnitude, and enduring ramifications of the proposed project.

The DEIS fails to provide a meaningful comparison of alternative flood damage reduction options citing the lack of project level details. This is in stark contrast with the proposed project and belies the lack of resources applied to identifying and fully considering alternatives (e.g. LAND) in the EIS, not a lack of flood damage reduction benefit. If implemented, the LAND actions being actively analyzed as part of the Chehalis Basin Strategy and in parallel to the DEIS process, would reduce flood damage risk to people and structures, be more predictable, actionable, and less costly near term. In conjunction with implementation of land use management plans and policies, adoption of new flood data, flood proofing of at-risk properties and structures, buyouts and relocations, and restoring natural floodwater storage processes are viable flood damage reduction options with significantly decreased environmental costs.

Mitigation Plan Not Included

DOE failed to include the Mitigation Plan as part of the DEIS made available for public review, despite specifically and repeatedly referencing the mitigation proposed by the applicant throughout the DEIS, and despite the fact that the FCZD prepared both a Revised Project Description and its detailed design-related appendices including a proposed Mitigation Plan in November 2024. The DEIS largely avoids any substantive technical analysis of the proposed mitigation actions, instead simply listing the proposed measures by the FCZD, those proposed by DOE and WDFW and repeatedly stating that there is uncertainty around whether the proposed mitigation is technically feasible or economically practicable.

Notwithstanding the failure to include the Mitigation Plan, DOE clearly indicates that the process to design adequate, feasible, and economically practicable solutions to mitigate the impacts from damming the upper Chehalis River would be long, complex, and

expensive. The DEIS identifies the multiple, interrelated regulatory review and approval requirements that would need to be met (e.g., Chapter 4 and Section 5.17.3).

WAC-197-11-660(2)(a and b) states that SEPA decision makers are required to analyze the environmental impacts of mitigation measures when the measures themselves represent a substantive change to the proposal so that the mitigation measures themselves are likely to have significant adverse environmental impacts and the mitigation will not be analyzed in a subsequent environmental document prior to their implementation.

Per WAC-197-11-660(2)(a and b) Substantive Authority and Mitigation

(2) Decision makers should judge whether possible mitigation measures are likely to protect or enhance environmental quality. EISs should briefly indicate the intended environmental benefits of mitigation measures for significant impacts (WAC 197-11-440(6)). EISs are not required to analyze in detail the environmental impacts of mitigation measures, unless the mitigation measures:

(a) Represent substantial changes in the proposal so that the proposal is likely to have significant adverse environmental impacts, or involve significant new information indicating, or on, a proposal's probable significant adverse environmental impacts; and

(b) Will not be analyzed in a subsequent environmental document prior to their implementation

The absence of any specificity or critical analysis of the mitigation proposed is a critical failure by DOE to convey to the public the intensity, scale, and cost which would be required to address the significant adverse impacts if the proposed project were to move forward.

Based on impacts from previous projects, we are left to deduce that adverse impacts to critical ecosystem processes, species, and habitats, as well as impacts to human recreation, land use, and public services and utilities would be significant, “unless mitigation is feasible.” Impacts to known and unknown archaeological resources and Traditional Cultural Places would be significant, even despite the relocation of the proposed project upstream in an attempt to address what was already deemed unmitigable destruction to Traditional Cultural Places. The relocation actually increases complexity, adding costly geotechnical and constructability constraints. As such, significant impacts to Environmental Justice for Tribal communities remain and would be detrimental and disproportionately harmful.

Disproportionate & Unmitigable Impacts to Tribal Rights & Resources

The DEIS clearly states that there would be disproportionate and unmitigable impacts to Tribal rights and resources of both the Confederated Tribes of the Chehalis and the Quinault Indian Nation. Yet as described in Section 7, the true nature, intensity, and duration of the anticipated impacts from the proposed dam are likely to be even more profound and permanent than described in the DEIS.

We stand in solidarity with the Confederated Tribes of the Chehalis and the Quinault Indian Nation with a position opposing the disproportionate effect on tribal resources and cultural resources and to Quinault Indian Nation treaty rights. This position is still supportable based on the 2025 DEIS, due to the severity of impacts to Spring Chinook and Steelhead populations, critical resources for both Tribes, as well as the acknowledged significant adverse impacts on other aquatic species, terrestrial wildlife and habitats that support native plants of importance for cultural practices, on a diversity of cultural resources and traditional cultural properties, and on the ecological integrity of the Chehalis River and its landscape.

Unaddressed Cumulative Impacts

Cumulative Impacts on Salmon and Steelhead Populations

The analysis of cumulative impacts on salmon and steelhead populations fails to consider many important factors that adversely affect these populations. As a result, the analysis does not meet the requirements for SEPA. Salmon population sustainability is influenced by the cumulative effects of many factors operating over the life cycle of these species. The factors operate over a vast expanse of freshwater and ocean environments across the extensive life history and migrations of these species. These factors include the quality of diverse habitats, harvest impacts (in both the ocean and river), predation, climate and ocean conditions, and hatchery interactions, among others. These factors can have significant near-term and cumulative impacts on survival in combination with the population's intrinsic productivity (i.e., its existing natural ability to grow and replace itself) (Mobrand et al. 1997; Blair et al. 2009; Ulaski et al. 2025). Even seemingly small impacts on the landscape, when repeated or combined with other stressors over time and space, can contribute incrementally to substantial cumulative harm (Ulaski et al. 2025).

The modeling approach to assess the cumulative impacts of many of these factors on salmon populations in the DEIS employed the EDT Model, which was developed on the concepts and algorithms described in Mobrand et al. (1997) and Blair et al. (2009); the model is conceptually sound to assess cumulative impacts. However, the modeling did not incorporate several factors that have significant effects on life cycle productivity, namely fishery exploitation, changes in Chinook age structure, maturation rates, body size, and

fecundity. Since the 1980s, the total exploitation rate on coastal Fall Chinook, including Chehalis Fall Chinook, has averaged 60% and shows no decline over time as had been expected under the Pacific Salmon Treaty (CBD & PR 2023; CTC 2023). It is certain that the total exploitation rate on Chehalis Spring Chinook, while probably not as high, is exceeding a sustainable rate (CBD & PR 2023). The DEIS fails to analyze impacts on future salmonid harvest both locally, and throughout the Pacific Rim.

Compounding the situation, the age structure and body size of Washington coastal Chinook, including Chehalis populations, have declined in recent decades, resulting in reduced fecundity and therefore the intrinsic productivity of these populations (Ohlberger et al. 2018; Malick et al. 2023). The EDT Model was not updated to incorporate these changes, and without these updates, the model projects Chinook population performance that is too high.

Another factor that was not incorporated into the modeling efforts is the hybridization that is now known to be occurring between Spring and Fall Chinook in the Chehalis Basin (Thompson et al. 2019b), which is having an adverse impact on the Spring Chinook population (Thompson et al. 2019a). Hybridization should have been discussed in the DEIS because it adds a further burden to Spring Chinook in the Chehalis Basin.

In addition, the survival rules in the EDT Model, as configured for the Chehalis Basin, do not sufficiently account for high predation rates that are occurring on Chehalis Chinook due to large numbers of smallmouth bass in the mainstem Chehalis River (Winkowski et al. 2024) and the ever-increasing population of pinnipeds (e.g., seals and sealions) in Grays Harbor and along the Washington Coast (Clark 2025).

The EDT Model was not updated to incorporate these influential factors, meaning that the cumulative impacts of all factors together are much greater than described in the DEIS. The added contribution of the proposed project is therefore much greater than described in the DEIS.

Cumulative Land Use Impacts

Although the DEIS acknowledges that potential cumulative impacts might occur, little attention is given to assessing any specifics around these types of cumulative impacts related to land use.

“New construction in the study area is expected to be concentrated in Urban Growth Areas and incorporated areas, such as Chehalis and Centralia. Potential for future expansion of agriculture, rural, residential, and commercial development could contribute to impacts. However, compliance with permit requirements would minimize these impacts. While the potential expansion of development would increase the intensity or density of land use,

consistency with Comprehensive Plans and zoning would decrease the potential for adverse impacts.” (DEIS Chapter 6.4.7 Land Use, pg. 258)

Particularly given climate change projections, any such expansion would put more people and assets at risk, increasing the risk of future flood damage. To be consistent with project goals, new development should not occur in flood-prone areas (including the area that would be impacted by a catastrophic dam failure with a full reservoir pool).

Omissions of Major Costs for the FRE

The Revised DEIS estimates the cost of the FRE project at \$1.3 to \$2.3 billion (HDR 2025b). However, this estimate grossly underestimates the likely actual project cost because it omits multiple components of the proposed project, including but not limited to major components of permitting, construction, site development, operations, mitigation design, construction, monitoring, and facility life-cycle costs that would be essential to project completion and operation. Inclusion of these numerous and substantive omitted elements would substantially increase the total project cost and thus these omissions raise serious concerns regarding constructability, feasibility, and purported cost benefit.

Major omitted or inadequately described cost elements identified in the 2024 and 2025 project designs include, but are not limited to:

- Stockpiling site development, haul, and stabilization (minimum of 5 million cubic yards of excavation and hauling (500,000+ truck trips)
- Water sourcing for construction (with high potential for water import and storage)
- Foundation excavation dewatering
- Foundation excavation stabilization
- Water treatment and management
- Bypass channel management (barrier for summer hydrologic loss associated with foundation excavation and dewatering and barrier to contain winter floods while foundation excavation is open)
- Deep foundation excavation (160 feet) into weathered and fractured bedrock and stabilization
- Large, deep-seated landslide stabilization (both within foundation and throughout reservoir)
- Complex cutoff wall excavation, stabilization, materials, and construction

- Schedule delays
- Additional grouting and foundation treatment acknowledged, but not described
- Coring and grouting water treatment
- Imported structural concrete aggregate and steel
- Imported materials, such as fly ash and steel, that currently may have steep tariffs
- Armoring sediment bypass tunnels (conduits) to prevent erosion. Bedload transport through the tunnel at Mud Mountain Dam threatened the integrity of the dam and required expensive maintenance (Auel et al. 2017)
- Development, implementation, monitoring and adaptive management of the proposed vegetation management plan and compensatory mitigation
- Regular FRE Operations staffing, monitoring, maintenance
- Facility insurance, taxes, licensing, regulatory reporting, certification and other compliance and administrative needs
- Additional facility and structure damages repair and maintenance, e.g. post flood event damages
- Land acquisition needed through easements and control or management obligations (dam site, reservoir footprint, mitigation lands, access roads/easements, soil disposal areas)
- Likely risks (diversion exceedance during construction, foundation risk, litigation with tribes)

The *Technical Review of FRE Construction and Operations Impacts Memo* (NSD and Saturna Watershed Sciences 2026c), showed that just the omitted project elements related to foundation excavation and stockpiling alone could potentially add \$1 billion to \$2 billion additional dollars to the construction cost! It is important that decision makers and the public are aware of the incomplete nature of the construction costs and the reasonable likelihood that they will substantially increase from what has been currently disclosed in order to determine the course of action to achieve the Chehalis Basin Strategy's goal of flood damage reductions across the Chehalis Basin.

Continued Omissions and Inadequate Impacts Analysis

While some aspects of the substantial issues raised regarding the adequacy of the 2020 DEIS impact analysis have been at least cursorily addressed in the 2025 DEIS, multiple substantive issues remain omitted or inadequately considered.

- Significant omissions related to dam construction:
 - Water use and water supply
 - Materials production at quarries and stockpiling of dam excavation materials
 - Geotechnical uncertainty related to FRE dam foundation design
 - Infeasible FRE dam construction schedule
 - Misleading and incomplete construction cost estimate.
- Significant omissions related to dam operations:
 - Infeasible reservoir drawdown rate
 - Elevated turbidity during drawdown
 - The loss of floodplain groundwater recharge
 - Infeasible and inadequate vegetation management
 - Landslide risk, sedimentation, and impacts associated with catastrophic failure
 - Claims of a “free flowing” condition and fish passage

There are four key issues related to the constructability of the proposed FRE dam and operational elements that reveal fundamental flaws in the analysis presented in the DEIS and that challenge the basic feasibility of the proposed project. These issues relate to:

1. Duration, volume, and timing of surface water withdrawal
2. Implications of the proposed dam location and drawdown rate for landslide stability
3. Implications of geotechnical, water withdrawal, and construction complexity on the construction duration and schedule, and
4. The implications of these factors as well as others on escalating project costs.

We conclude that:

1. There are fundamental flaws with key elements of the proposed construction methods that call into question whether the proposed project is feasible under existing state law;
2. The scale and intensity of dam operations and consequent impacts are more significant than disclosed in the DEIS and the analysis presented in the DEIS includes substantial errors;
3. The mitigation proposed for the understated impacts does not adequately minimize the significance of the impacts;
4. The likely duration/construction schedule and the cost of the project have been grossly underestimated and misrepresented.

Consequently, the information presented in the DEIS and related documents misinforms decision makers, the public, and permitting agencies about the intensity, duration, and nature of the impacts from the proposed dam and its cost. We also conclude that the construction and operation of the FRE dam would result in significant and unmitigable impacts.

Poor Analysis of Local Actions Alternative

The DEIS provides an extraordinarily cursory consideration of the Local Actions Alternative, focusing only on the generalized effects of flooding and flows and effects on wildlife and habitats. The DEIS fails to evaluate benefits to wildlife and habitats of buyouts, relocations, flood proofing and related aspects of the Local Action Alternative which would substantially improve conditions for wildlife and habitats by moving human infrastructure out of the floodplain, expanding habitat restoration opportunities, and most significantly not constructing a FRE dam and thus not initiating the cascade of amplifying geomorphic and habitat impacts which would irrevocably alter the river and its floodplain.

Climate Assessment Methods Do Not Employ Current Best Science

The DEIS does not use best available, current climate science. Methods used for the analysis are based on median values and an ensemble of twelve 5th generation global climate models (GCMs), response scenarios, and dynamic downscaling, available since 2014. Major improvements that have since been incorporated into GCMs (more than 100 models utilized for the 6th phase of the Coupled Model Intercomparison Project (CMIP) have been available for several years, with greater resolution and improved representation of forcing mechanisms, downscaling methods, and response scenarios) but these were not considered or utilized. The 2023 report produced by Portland State University (PSU 2023), one of the main technical reports supporting climate change evaluation in the DEIS, relies

on outdated models and prior analyses and fails to consider or evaluate other sources of information, technological developments, and observational data.

The DEIS also does not disclose the basis for selection of models to include in the GCM ensemble. Median values from the 12 GCM ensemble were used for climate projections, with no evaluation or explanation provided for the selection of the 12 GCMs employed in the ensemble from the over forty 5th generation GCMs that were available or the approximately one hundred 6th generation GCM that were utilized to produce the 2023 sixth IPCC Synthesis Report. The median values were derived from twelve GCMs with different representations of forcing mechanisms which were developed for different purposes; consequently, anomalous results appear in the DEIS for peak and low flows and water quality metrics.

Comparison of Alternatives Biased

Transparency is lacking and impacts are biased, overstating both benefits of the proposed project and potential risks of the No Action Alternative. Model projections reflect results from the ensemble of twelve 5th generation GCMs using RCP 8.5 (Representative Concentration Pathway). RCP 8.5 is a high-emissions climate change scenario that represents a future with rapidly increasing greenhouse gases, leading to significant warming (around 4-5°C by 2100) and severe impacts. The use of this RCP presents a best-case scenario for the assertion of potential benefits from flood protection under the proposed project and a worst-case scenario for adverse impacts on fish, wildlife, and cultural resources for the No Action Alternative. This results in an unfairly biased comparison with the proposed project (dam and airport levee) alternative. Neither the Local Action Alternative included in the DEIS, nor the Local Actions Non-Dam (LAND) alternative currently under development within the Chehalis Basin Strategy as part of the model comparative analysis initiative were substantively evaluated.

Inadequate Representation of Regulatory Approval Complexity

Forest Practices

The DEIS does not fully capture the complexity of regulatory approvals mandated by the Washington Forest Practices Act, resulting in omissions and oversimplifications that undermine the accuracy and completeness of the environmental review. Key issues include the failure to disclose the need for a Class IV-Special authorization under WAC 222-16-050(1)(d) for activities on potentially unstable slopes. The DEIS also omits critical analysis of potentially unstable slopes and site-specific mitigation measures. Furthermore, it relies on incomplete landslide mapping, resulting in inaccurate assessments of impacts

to the Chehalis River and public safety, which is out of compliance with SEPA policies outlined in WAC 222-10-030.

Additionally, the DEIS ignores the requirement for an Alternate Plan under WAC 222-12-0401, which must provide protection to public resources at least equal to those in the Forest Practices Act. These deficiencies raise concerns about the accuracy and completeness of the environmental review, as well as potential risks to public resources, public safety, and treaty-protected resources.

Omission of Costs of Impacts to Public Services

The DEIS does not consider the costs of the proposed project on public services as is required by WAC 197-11-440(6)(e).

*WAC 197-11-400 (6)(e) Discussion of significant impacts shall include **the cost of and effects on public services, such as utilities, roads, fire, and police protection, that may result from a proposal.** EISs shall also discuss significant environmental impacts upon land and shoreline use, which includes housing, physical blight, and significant impacts of projected population on environmental resources, as specified by RCW 43.21C.110 (1)(d) and (f), as listed in WAC 197-11-444.*

Opportunity Cost – Lost Time and Wasted Effort

Over fifteen years of effort and over \$100 million state tax dollars have been spent to support advancement of studies and preliminary design of the FRE and airport levee improvements, the 2020 and the 2025 environmental impact statements, and the 2017 final Programmatic EIS for the Chehalis Basin Strategy. Despite this, the identified costs and technical feasibility of the proposed project make it no more likely to move forward than it was in 2008. As a result of funding being diverted to the proposed project, other Local Action Alternatives that could have had near term and immediate flood damage risk reduction benefits have made only modest progress to reduce flood damage risk.

The 2025 revised DEIS, like the 2020 DEIS, arrives at conclusions of probable significant adverse environmental impacts from both construction and operation of the FRE, in portions of the Chehalis Basin both upstream and downstream of the FRE. The levels of flood reduction as presented in the DEIS still leave most Chehalis Basin residents unprotected from major or catastrophic flood damage and do nothing to prevent flood damage from more frequent localized flooding.

While we agree with many of the DEIS findings of significant and unmitigable impacts, we also believe that many impacts were underestimated or omitted and that costs have been significantly underestimated. As such, we believe that this project is not implementable.

However, if the Office of the Chehalis Basin directed future funding for flood damage reduction to projects and activities that are implementable, they will provide flood damage reduction in the near term, and finally be making investments that are in the best interest of both Chehalis Basin residents and Washington State taxpayers.

In examining how the money spent to date on the FRE project (using approximately \$100 million in state dollars spent) could have been utilized to reduce flood damage in the Chehalis Basin, consider the following:

- For properties that experience less than one foot of flooding, 5,000 homes or 3,300 commercial / agricultural properties could have been floodproofed (per structure cost from Office of Chehalis Basin, 2025) or
- For properties that experience 1-5 feet of flooding, 660 valuable structures could have been elevated (per structure cost from Office of Chehalis Basin, 2025) or
- For properties that experience more than 5 feet of flooding, 250 valuable structures could have been acquired (per structure cost from Office of Chehalis Basin, 2025) or
- The entire length of the LAND North Skookumchuck levee or approximately half of the South Skookumchuck levee could have been constructed using the high-end cost estimate (Moffat & Nichol, 2025) or
- Some combinations of the above could have been implemented.

According to the DEIS, the Community Flood Assistance and Resilience (CFAR) program, the Office of the Chehalis Basin's technical and financial assistance program for floodproofing, elevations, and buyouts, has had only modest success to date. The DEIS reported that 26 properties received technical assistance through CFAR in the 2021-2023 state biennium, that resulted in 12 home elevations and 2 buyouts (DEIS Appendix 1, Section 5.2.4, pg. 71). Elevation of four additional homes is currently planned or recently completed in the current biennium. Yet, the Chehalis Basin Board is still only funding the program at a \$3 million level for the 2025-2027 biennium, which would only enable a similarly modest level of activity.

We encourage the Office of the Chehalis Basin and Chehalis Basin Board to refocus its efforts on these proven, cost-effective flood damage reduction strategies that are implementable and will provide near term relief to basin residents rather than continued fixation on the FRE project, which, even if it is implemented on the timeframe estimated in the Chehalis Basin Strategy Comparative Analysis, would not be operational until 2042 (IEc,2025). Greater progress could be made in the years between now and 2042 to reduce

the flood damage risk of current structures and to change the land use laws to prevent construction and development of structures in harm's way, providing relief to residents and properties in the basin.

Conclusion

While we do appreciate the effort and work that has gone into the preparation of the DEIS, it is clear to this organization and its supporters that the negative impacts outweigh the positive impacts thus we cannot support the building of a dam. We do encourage the implementation and further development of the original Local Actions Non-Dam Alternative LAND before it was diminished to just the structural components.

We thank you for this opportunity and look forward to supporting non-dam actions in the Basin to restore fish and salmon through ecological restoration and live with an ever-increasing flood regime.

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