

Thurston County (Thurston County)

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THURSTON COUNTY

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Karen Weiss, Public Works Director | Ashley Arai, Community Planning & Economic Development Director

February 4, 2026

Bobbak Talebi
Southwest Region Office
P.O. Box 47775
Olympia, WA 98504-7775

RE: SEPA Revised Draft EIS for Chehalis Flood Damage Reduction Project

Dear Mr. Talebi,

Thurston County appreciates the opportunity to review and provide comments on the Draft Environmental Impact Statement (DEIS) for the Chehalis Flood Damage Reduction Project. As a local government with jurisdictional and environmental interests in the region, we are committed to ensuring proposals consider environmental, public health, safety, and community impacts comprehensively.

Many Thurston County residents recall the tragic losses from flooding in the 1990s to 2000s, especially to the residents of Lewis County. The desire to never repeat those events is understandable. However, the DEIS makes clear that despite its high costs, the currently proposed project is unlikely to meet many public expectations.

The DEIS reports that the dam portion of the project, or Flood Retention Expandable (FRE) facility, causes numerous unavoidable significant impacts. The benefits in Thurston County from the FRE facility are unjustifiable compared to the adverse effects stated in the DEIS and potential costs identified in previous reports. This letter summarizes five areas of the DEIS and its impacts.

1. Flooding Impacts

The DEIS reports that only major or catastrophic floods (similar in flow to the 2007 flood) will be retained by the FRE facility, allowing normal floods and minor damage to continue to occur year over year. The DEIS reports that the FRE facility reduces the flood water depth and the duration it takes the flood water to recede within Thurston County, but only by a minimal amount. Additionally, the location of the FRE facility does not seem optimal to address flooding, as it is proposed to be located upstream of significant tributaries.

2. Fisheries & Tribal Support

The DEIS report shows that existing fish habitat and environmental conditions in the river will worsen as water temperature increases and one of the three major spawning locations for salmon becomes unavailable due to dam construction. The study does not address mitigation issues. Further, any proposed mitigation should rely on proven salmon recovery methods. It also was specified in the DEIS that Tribes have expressed their dissatisfaction with the proposal, stating in clear terms that the significant and unavoidable adverse environmental impacts would be unacceptable.

3. Other Alternatives

Board of County Commissioners

Carolina Mejia **District One** | Rachel Grant **District Two** | Tye Menser **District Three**

Wayne Fournier **District Four** | Emily Clouse **District Five**

The revised DEIS inappropriately dismisses some viable alternatives without significant analysis, including purchasing basin forestry that would provide for opportunities for water storage in soil from improved mature vegetation, thick detritus – controlling fully 50% of the Chehalis Basin water volume. Modeling of the entire basin is now available and could be used to test soil storage opportunities. The revised DEIS fails to analyze changes to hydrology resulting from modern working-forestry practices adopted in the 1990s to 2000s. These changed practices may have effectively nullified or significantly reduced the underlying conditions that led to the floods-of-record the Proposed Project seeks to ameliorate (for example by significantly reducing the logs/slash that damaged bridges and abruptly released floodwaters).

The revised DEIS inappropriately omits model analysis of the proposed new/modified levees and building relocations absent the dam project element. The levee improvements and building relocations (the two other main parts of the project) seem to provide significant benefits.

4. Impact on Public Services

The revised DEIS study area within Thurston County is not large enough to properly assess the impact the FRE facility will have on public services or utilities. Based on the study area shown in the DEIS, there are multiple public services omitted from detailed analysis, including two schools and the Thurston County water and wastewater treatment plant in Grand Mound. We do anticipate some benefit for Thurston County to scour-critical bridges during major and catastrophic flooding,

5. Potential Costs

Historically, cost overruns on similar flood-control projects are common. We are concerned the projected cost of the dam does not reflect the likely true cost, and therefore the assessment of the cost-benefit is hard to assess. A standard point-by-point scoring of a broad range of directly comparable and effective alternatives appears to have been omitted.

We do not wish to dissuade project proponents who want to protect the residents and property of Lewis County. The dam appears to provide significant benefits in the Route 6 corridor and in the City of Chehalis – benefits predominantly in Lewis County.

If you have questions, please feel free to contact Karen Weiss at (360) 867-2327 or Ashley Arai at (360) 786-5486.

Sincerely,



Karen Weiss
Public Works Director



Ashley Arai
Community Planning & Economic Development Director

Cc: Leonard Hernandez, County Manager