Zac Hanson

m writing to comment in opposition to the proposed Chehalis River Basin Flood Damage Reduction Project as described in the Revised Draft Environmental Impact Statement (EIS).
While reducing flood risk is an important goal, the revised proposal continues to rely on large-scale structural interventions—particularly the flood retention facility and temporary reservoir near Pe Ell—that pose significant and long-lasting environmental, cultural, and economic harms that are not adequately justified by the anticipated benefits.
Environmental Impacts
The proposed flood retention facility would inundate forested lands, wetlands, and wildlife habitat that are critical to the ecological health of the Chehalis River Basin. The EIS does not sufficiently demonstrate how these losses can be avoided or meaningfully mitigated, particularly given the cumulative impacts to salmon populations, water quality, sediment transport, and riparian ecosystems. Once these natural systems are altered, the damage is largely irreversible.
Impacts to Communities and Tribal Resources
The proposal places disproportionate burdens on upstream rural communities while primarily benefiting downstream development. Flooding land near Pe Ell—whether labeled "temporary" or not—raises serious concerns about impacts to private property, working lands, cultural resources, and treaty-protected tribal interests. The EIS does not adequately address environmental justice considerations or demonstrate meaningful consent from affected communities.
Overreliance on Structural Solutions
The project continues to prioritize engineered flood control infrastructure over less damaging, more adaptive alternatives. Non-structural solutions—such as floodplain restoration, land-use planning, strategic buyouts, and relocation from high-risk areas—receive insufficient emphasis despite being more resilient under climate change scenarios and less harmful to river systems.
Climate Change Uncertainty
Climate projections indicate increasing uncertainty in precipitation patterns and flood intensity. The EIS does not convincingly show that a large retention facility designed under current assumptions will remain effective or safe over its lifespan. Locking the basin into a single, inflexible solution risks failure while foreclosing better future options.
Process and Alternatives Analysis
Although this is a Revised Draft EIS, it does not adequately respond to substantive concerns raised on the 2020 Draft EIS, particularly regarding alternatives that avoid damming or intentional flooding of upstream lands. A more robust alternatives analysis is needed before moving forward.
Conclusion
For these reasons, I urge the Department of Ecology to reject the proposed project as currently designed and to require a revised approach that prioritizes non-structural flood mitigation, protects natural river functions, respects affected communities and tribes, and aligns with long-term climate resilience.
Thank you for the opportunity to comment.