

Gil Zemansky

Attached are the comments of the Wise Use Movement, P.O. Box 17804, Seattle, WA 98127



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Tamen Usque Recurret

WISE USE MOVEMENT

P.O. Box 17804, Seattle, WA 98127

February 3, 2026

TO: SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project
c/o Bobbak Talebi, Southwest Region Office
P.O. Box 47775
Olympia, WA 98504-7775
<https://admin.ecology.commentinput.com?id=6U54ErkfW>

RE: State Environmental Policy Act Revised Draft Environmental Impact Statement (RDEIS) For Proposed Chehalis River Basin Flood Damage Reduction Project (FDRP)

The following are the comments of the Wise Use Movement:

GENERAL COMMENTS

The proposed project would support the future construction of a dam on the Chehalis River that could expand the water storage from its maximum design capacity of 62,000 acre-feet to up to 130,000 acre-feet, raise the Chehalis-Centralia Airport levee from 1.3 to 5.3 feet, and raise a portion of NW Louisiana Avenue.

The Wise Use Movement is opposed to the proposed Chehalis River dam and finds that the RDEIS fails to comply with the State Environmental Policy Act and should be withdrawn.

RCW 43.21C.030(c)(iii) sets out that for major actions significantly affecting a detailed statement including “alternatives to the proposed action” are required.

WAC 197-11-060(3)(a)(iii) sets out:

“Proposals should be described in ways that encourage considering and comparing alternatives. Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions. A proposal could be described, for example, as ‘reducing flood damage and achieving better flood control by one or a combination of the following means: Building a new dam; maintenance dredging;

use of shoreline and land use controls; purchase of flood prone areas; or relocation assistance.’”

Rather than complying with SEPA, the RDEIS has failed to include a range of alternatives. Rather, the RDEIS presents a “Flood Damage Reduction Project” with only a no-action alternative and a Local Actions Alternative (LAA), which is limited to reduce flood damage in the Chehalis-Centralia area. This LAA “is not the same as the Local Actions Non-Dam (LAND) Alternative being evaluated in the Chehalis Basin Strategy.” *RDEIS Fact Sheet*. In essence, the RDEIS is presenting a major uneconomical and environmentally damaging new Chehalis River Dam, a take-it-or leave-it project that fails to offer decisionmakers or the public any real choices. The RDEIS has failed to comply with SEPA and failed to provide a reasonable range of alternatives, such as the cessation of clearcutting and new logging roads within the Chehalis River Basin and closure and rehabilitation of unused logging roads; inclusion of the Local Actions Non-Dam Alternative; and alternatives to the Chehalis-Centralia Airport levee, which induces and put at risk, additional development.

The Wise Use Movement finds the RDEIS is deceptive in its description of the proposed project. The RDEIS refers to the project as a “flood retention expandable (FRE) facility” (page S-3). It appears that the RDEIS is attempting to hide the fact that a major uneconomical and environmentally damaging new dam is proposed on the Chehalis River in the guise of a “flood retention expandable (FRE) facility.” A search of the RDEIS reveals that it uses the acronym (FRE) approximately 661 times, while referring to a “dam” only 54 times.

- Why does the RDEIS insist on using the acronym (FRE) and avoid used the term “dam”?

The Wise Use Movement finds that the RDEIS is inadequate as it lacks a specific monitoring program that the public can review in advance. The RDEIS does not contain a specific section on “monitoring.” Rather, vague statements are scattered throughout the RDEIS:

For fish species and habitats (RDEIS-page 223):

“Permitting agencies, including WDFW and Ecology, would require the Applicant to prepare and implement a monitoring plan that includes performance standards, success criteria, and adaptive management actions to ensure the effectiveness of aquatic habitat mitigation.”

For wildlife species and habitats (RDEIS-page 226):

“Permitting agencies, including WDFW and Ecology, would require the Applicant to prepare and implement a monitoring plan that includes performance standards, success criteria, and adaptive management actions to ensure the effectiveness of wildlife habitat mitigation.”

Vague statements concerning future monitoring plans hidden from the public until after project approval is contrary to SEPA. Monitoring is an essential component of natural resource management because it provides information on the relative success of management strategies. Do the proposed management actions comply with laws and management policy? In addition, monitoring should provide information to the public to determine if the laws and management policies are being followed (implementation monitoring), verify if they are achieving the desired results (effectiveness monitoring), and determine if underlying assumptions are sound (validation monitoring).

Impact monitoring, followed by appropriate corrective measures, is an appropriate type of mitigation. The proper remedy is to monitor the operation and to halt operations in the event of noncompliance. However, without monitoring or reporting requirements to the public, the public has no confidence that Federal Agencies, or the Department of Ecology or other State Agencies would monitor or report any significant adverse environmental impacts from the proposed project to the public.

The Wise Use Movement finds that the RDEIS fails to disclose specific mitigation measures. Sec. 5-17, page 221, states: “The decision on whether mitigation is feasible would be determined during the permitting processes by the permitting agencies.” However, the RDEIS fails to disclose whether any of these hypothetical mitigation measures would be subject to public review and comment.

SUMMARY

In conclusion, the Wise Use Movement is opposed to a new dam on the Chehalis River. The existing RDEIS is inadequate and should be withdrawn.

Please provide a copy of any decision made on the RDEIS. Thank you.

/s/ Gil Zemansky
President
Wise Use Movement