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Bobbak Talebi, Regional Director
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:

I am writing on behalf of American Whitewater regarding the SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project. American Whitewater opposes construction of a new dam on the Chehalis River (referred to by proponents as a "Flood Retention Facility"). The Revised Draft EIS continues a flawed and outdated reliance on large structural flood control that cannot eliminate flooding and would impose permanent ecological and recreational losses. Instead, the State should prioritize floodplain-based solutions that reduce risk while protecting healthy rivers, vibrant fish runs, and outdoor recreation—values that are central to quality of life in the Pacific Northwest.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 70,000 supporters, 7,000 dues-paying members, and 80 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates. As an organization that represents recreational river runners on issues related to both conservation and public access to waterways, American Whitewater has an interest in the Chehalis River. A significant percentage of our members reside in Washington State—a short driving distance from this river for recreation.

The Chehalis River has one of Washington State's longest continuous sections of Class III whitewater, yet it remains relatively unknown to many paddlers due to restrictions on public access. The reaches below the proposed dam site were mapped and documented for recreational use by Wolf Bauer on the Washington Kayak Club's Kayaking River Map during the 1950s and 1960s.[1] The reach upstream of the proposed dam site was first described in detail in A Guide to the Whitewater Rivers of Washington.[2] It is also included in American Whitewater's National Whitewater Inventory.[3] The proposed flood control dam would eliminate 14 miles of this wild and free-flowing Class III whitewater (West Fork to Pe Ell), forever keeping paddlers from discovering this underused trove of quality whitewater in southwestern Washington. Our vision is for a river that remains free-flowing and is accessible to the public.

History of Flood Management and Need for a New Approach

As a nation, we have a long history of trying to control floods through large engineered structures. Despite billions of dollars invested in dams, levees, and reservoirs, flooding continues to recur, often with increasing costs and consequences. This reflects a basic reality: while engineering can sometimes reduce flood risk in specific locations, it cannot eliminate flooding,[4] and it often comes with substantial ecological tradeoffs and long-term maintenance obligations.

Federal flood policy shifted decisively toward structural solutions with the Flood Control Act of 1936, which declared flood control a national responsibility and launched a nationwide program of reservoirs, dams, and other major infrastructure.[5] Even at the time, however, leaders recognized that an alternative approach—managing land use in flood-prone areas—could often reduce risk more effectively and at far lower long-term cost. As early as the mid-19th century, Congress was advised that floodplains should be reserved for overflow and natural storage. After the devastating Ohio River floods of 1912 and 1913, the Army Corps of Engineers itself

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[1] https://site-media.americanwhitewater.org/Document_578.pdf
[2] Bennett, J. 1991. A Guide to the Whitewater Rivers of Washington. Swiftwater Publishing Company.
[3] https://www.americanwhitewater.org/content/River/detail/id/2081/
[4] The analysis presented in the Revised Draft EIS claims that the proposed Flood Retention Facility would effectively reduce flood peaks in the Chehalis–Centralia area. Such claims overlook the fact that the region also experiences recurring flood damage from several local tributaries, including China Creek, Salzer Creek, Coal Creek, and Dillenbaugh Creek, as well as from storm events centered over the Black Hills and Cascade Range foothills that drive flooding in the Skookumchuck, Newaukum, and lower Chehalis Rivers. The Department's analysis does not adequately consider the Local Actions Non-Dam Alternative and other nonstructural measures as a means of reducing flood damage originating from these other sources—measures that could provide more comprehensive and basin-wide relief than a single structural facility on the Upper Chehalis.
[5] See the detailed overview in Palmer, T., 2024, Seek Higher Ground, The Natural Solution to Our Urgent Flooding Crisis, University of California Press.

endorsed moving valuable development out of flood-prone areas rather than relying solely on structural controls.

These ideas resurfaced during debate over the 1936 legislation, when some policymakers argued that restricting new construction in flood zones, relocating vulnerable structures over time, and allowing rivers room to function naturally would be more prudent than building ever-larger engineering works. Those nonstructural approaches were ultimately rejected, particularly in the wake of the catastrophic March 1936 floods, and the federal government instead embraced dams and reservoirs as the dominant tools of flood control for much of the twentieth century.

The consequence of this choice has been a long legacy of ecological degradation, perpetual infrastructure costs, and continued vulnerability where floodplain development persists. The Chehalis River presents an opportunity to move beyond this legacy by pursuing floodplain-based strategies that reduce risk while protecting river function, fisheries, and recreation—rather than repeating the structural approaches of the past.

Consistent with these lessons, the Revised Draft EIS fails to adequately evaluate reasonable nonstructural alternatives to a highly engineered dam-based approach. SEPA requires agencies to analyze alternatives that could feasibly meet a proposal's objectives at a lower environmental cost or with less environmental degradation.[6]

The Local Actions Non-Dam (LAND) Alternative and related measures being actively developed through the Chehalis Basin Strategy—including updated floodplain data, floodproofing of at-risk structures, buyouts and relocations, restrictions on new floodplain development, and restoration of natural floodwater storage processes—represent viable and less environmentally damaging approaches to flood damage reduction. These actions are more predictable and actionable in the near term, avoid the permanent ecological and recreational losses caused by a dam, and reduce reliance on a large engineered structure requiring perpetual maintenance.

Yet the Revised Draft EIS does not provide the level of analysis necessary to demonstrate why these approaches cannot feasibly attain the project's objectives. Instead, the document continues to emphasize a structural solution that would permanently inundate a free-flowing river reach, despite the availability of alternatives that would reduce flood risk while preserving the Chehalis River's natural and recreational values.

[6] WAC 197-11-440(5)(b)

Appendix J – Recreation Discipline Report: Inadequate Analysis of Whitewater Recreation Impacts

Appendix J of the Revised Draft EIS acknowledges that the Chehalis River supports kayaking and whitewater rafting and identifies the West Fork to Pe Ell reach as one of the longer continuous Class III–IV whitewater runs in Washington State. This reach represents a rare and regionally significant recreational resource that depends on a free-flowing river corridor, suitable seasonal flows, and uninterrupted access. Whitewater boating opportunities are not interchangeable with other forms of recreation; they exist only where gradient, hydrology, channel form, and continuity come together to create a viable run. The Chehalis River therefore provides a unique recreational value that cannot be replicated through off-site amenities.

Despite this acknowledgment, Appendix J does not provide an adequate analysis of the project's impacts to whitewater recreation. The report largely treats whitewater boating as a generalized category of "boating" or "recreation," without evaluating the flow-dependent and reach-specific characteristics that impact viability of whitewater recreational opportunities. The analysis does not meaningfully address how altered hydrology, operational constraints, or reservoir inundation would affect boating seasonality, safety, predictability of access, or the integrity of the West Fork to Pe Ell run as a continuous whitewater experience.

The Revised Draft EIS concludes that construction and operation of the proposed dam would permanently close boating access on affected reaches and that these impacts would be significant and unavoidable even after mitigation. This conclusion underscores the severity of the project's effect on river-based recreation, yet the document does not grapple with the fact that such closures would permanently eliminate a finite and irreplaceable whitewater resource. Once a reach is inundated, fragmented, or operationally restricted, the recreational opportunity is lost for current and future generations.

Moreover, the proposed mitigation measures do not address the loss of whitewater recreation opportunities. Appendix J relies primarily on off-site recreational enhancements such as trails, campgrounds, or access improvements elsewhere in the basin. While such measures may benefit some users, they are not functionally equivalent to the loss of a free-flowing whitewater river reach. SEPA requires agencies to take a hard look at impacts and consider mitigation that is commensurate with the affected resource. Recreational infrastructure improvements cannot substitute for the permanent elimination of 14 miles of Class III whitewater and do not constitute meaningful mitigation for river-based boating opportunities.

Impacts to Salmon and Tribal Fisheries Resources

The Revised Draft EIS acknowledges that the proposed dam would cause significant and unavoidable harm to salmon and other native fish populations in the Chehalis Basin. The document projects dramatic declines in spring and fall Chinook, coho, steelhead, and lamprey during construction and operation, including the potential elimination of spring Chinook upstream of the dam by mid-century.

These findings are deeply concerning. Salmon are foundational to the ecological health of the Chehalis River, central to the region's identity, and integral to the Treaty-reserved fishing rights and cultural resources of Tribal Nations. A project that would permanently degrade habitat, simplify the river channel, increase water temperatures, and reduce the resilience and diversity of salmon populations cannot be viewed as a sustainable flood management solution.

While other commenters will provide detailed technical analysis, American Whitewater emphasizes that these impacts to salmon runs, and to Tribal and public fisheries, are an unacceptable cost of this project. The State has a shared responsibility with Tribal Nations to protect and recover these fisheries, not further degrade them.

Conclusion

Flood risk in the Chehalis Basin will not be solved through a single large structural project that permanently sacrifices a free-flowing river, irreplaceable whitewater recreation, and critical salmon habitat. The Revised Draft EIS acknowledges significant and unavoidable impacts, yet it does not adequately evaluate reasonable nonstructural alternatives or provide mitigation commensurate with the resources that would be lost. The Department should fully analyze the LAND Alternative and other floodplain-based approaches that can reduce flood damage at lower environmental cost, while protecting fisheries, Tribal resources, and river-based recreation for current and future generations. Floodplain-based solutions can reduce risk while supporting salmon recovery, honoring treaty resources, and maintaining the Chehalis as a rare recreational river corridor.

Sincerely,

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director