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Revised Draft Comment Letter to the Washington Department of Ecology
(Including Cost Concerns)
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Subject: Key Environmental, Cultural, Hydrologic, and Cost Concerns in the Revised Draft EIS for the Proposed Chehalis River Flood Retention Facility

Thank you for the opportunity to comment on the revised draft Environmental Impact Statement (rEIS) for the proposed flood-retention facility on the upper Chehalis River. After reviewing the document, several issues stand out as significant, unresolved, and in many cases explicitly identified by Ecology as "serious and unavoidable" without a finalized mitigation plan. These concerns warrant careful reconsideration before any advancement of the project.

1. Fish and Aquatic Habitat Impacts
The rEIS acknowledges that the project would cause substantial and unavoidable harm to fish, wildlife, habitat, and water resources in the Chehalis Basin. Key issues include:
• Chinook salmon and steelhead vulnerability due to habitat loss, altered flow regimes, and temperature changes.
• Habitat fragmentation from disrupted migration timing, sediment transport, and wood recruitment.
• Incomplete mitigation planning, as the Flood Control Zone District's mitigation plan was not included in the rEIS.
Given the ecological and cultural importance of salmon, these gaps are consequential.

2. Hydrologic and Geomorphic Trade-offs
While the project may reduce peak flooding for certain communities, the rEIS highlights several hydrologic concerns:
• Uneven distribution of benefits, with some areas seeing little change or new risks.
• Disruption of natural floodplain processes, including sediment deposition and channel migration.
• Persistent vulnerability to large or compound flood events even with the dam.
These trade-offs raise questions about long-term resilience and whether a structural intervention is the most effective path.

3. Water Quality and Local Water Systems
The rEIS identifies several water quality risks:
• Temperature and turbidity changes during temporary reservoir operations.
• Potential impacts to local drinking water systems, demonstrating that effects extend beyond ecological concerns.
These issues require clearer mitigation commitments and long-term monitoring.

4. Wildlife, Forestland, and Land Use
The project footprint affects forestland, wildlife habitat, and land use patterns:
• Permanent and intermittent habitat loss from the reservoir and associated infrastructure.
• Forestland clearing and hydrologic alteration that reduce ecological function and carbon storage.
• Cumulative impacts when combined with existing land uses such as logging and road networks.
The rEIS acknowledges these impacts but does not fully resolve how they will be mitigated.

5. Tribal Resources and Cultural Impacts
The rEIS identifies significant impacts to tribal rights and cultural resources:
• Direct harm to treaty-protected salmon and steelhead, central to the Quinault Indian Nation and Confederated Tribes of the Chehalis Reservation.
• Risk to cultural and archaeological sites from construction and periodic inundation.
• A fundamental tension between flood protection for built infrastructure and long-term cultural survival.
These concerns require meaningful government-to-government engagement and respect for treaty obligations.

6. Community and Social Impacts
The project offers flood protection for many structures but also imposes new burdens:
• Disproportionate impacts on rural communities near the project footprint.
• Potential decline in recreation and river-based economies where habitat and flow patterns are most altered.
• A mismatch between near-term losses and long-term projected benefits, especially without a complete mitigation framework.
These social dimensions deserve deeper analysis.

7. Cost, Mitigation, and Fiscal Transparency
The rEIS does not provide a complete or transparent cost analysis, particularly regarding mitigation, long-term operations, and cumulative project expenses. This is a critical omission.
• Mitigation costs remain unknown, because the mitigation plan was not included in the rEIS.
• Construction and maintenance costs for large infrastructure projects continue to escalate statewide.
• Long-term operational costs are not fully detailed.
• Opportunity costs — including non-structural alternatives such as restoration, land-use changes, and voluntary relocation — are not fully evaluated.
• Cost-benefit distribution is uneven, with rural communities bearing disproportionate impacts while receiving fewer direct benefits.
Without a full accounting of these costs, it is not possible for the public or decision-makers to evaluate whether the proposed structural intervention is the most cost-effective or equitable approach. A project of this scale requires complete fiscal transparency before any decision is made.

8. Alternatives and Process Concerns
The rEIS compares the revised design to the 2020 version and evaluates alternatives, but several issues remain:
• Design changes reduce some impacts but do not resolve the fundamental ecological conflict of placing a large structural intervention in a salmon river.
• The mitigation plan is not yet available, limiting the public's ability to evaluate the full trade-off.
• Non-structural alternatives remain less fully developed despite their potential for long-term resilience.
A decision of this magnitude requires a complete and transparent comparison of all viable approaches.

Conclusion
The revised draft EIS provides valuable analysis, but it also highlights substantial unresolved

impacts to fish, water quality, wildlife, tribal resources, rural communities, and basin-wide ecological function. The absence of a finalized mitigation plan and a complete cost analysis makes it difficult to fully assess the project's long-term consequences or determine whether the proposed benefits outweigh the documented harms.

Given the ecological, cultural, and hydrologic importance of the Chehalis Basin, I urge Ecology to ensure that all mitigation measures, cost components, alternatives, and cumulative impacts are fully evaluated and publicly available before any decision is made.