Craig Zora

I oppose the construction of a dam or flood retention expandable (FRE) facility on the Chehalis River.

TRIBAL PROPOSED MITIGATION To date, there is no information available about mitigation proposed by or supported by the Tribes that would reduce the unique impacts on Tribal and cultural resources to a level that is less than significant. More detailed studies and review—including identification of specific impacts and mitigation measures and Government-to-Government consultation—would be conducted during the permitting processes, before implementation of the proposed project. Federal NEPA evaluation, Section 106 consultation, and Endangered Species Act consultation timeframes and outcomes are unknown.

FRE BARRIERS TO FISH PASSAGE Fish passage efficiency would be reduced during construction and operation of the FRE facility, potentially creating barriers to movement for some species and life stages, especially weaker ones, placing local fish populations at risk. There is uncertainty around the design and performance of fish passage facilities, especially for resident fish species due to limited data on swimming capabilities and behavior through structures like conduits and bypass channels. Construction of the FRE facility would have significant adverse impacts on anadromous fish due to permanent changes in hydraulic conditions that differ from existing stream channels.

SALMON POPULATIONS IMPACTED Modeled results predict sharp declines in salmon and steelhead abundance, productivity, and diversity due to habitat changes caused by the FRE facility, especially in the temporary reservoir inundation area where life-history trajectories are eliminated. The long-term effectiveness of the Applicant's proposed fish passage facilities and their interactions with different life stages and species are unknown.

MODEL LIMITATIONS Limitations in the integrated Ecosystem Diagnosis and Treatment (EDT) and Life Cycle Model (LCM) include: a) Uncertainties in biological status of species such as spring-run Chinook salmon. b) Uncertainty in fish passage estimates. c) Uncertainty about climate change effects on ocean and Grays Harbor conditions. d) Uncertainty in mid- and late-century flow and temperature conditions e) Inability to evaluate conditions above the FRE facility or in tributaries due to HEC-RAS model limitations. f) Uncertainty in flood impacts due to monthly rather than daily modeling time steps. g) Fixed flood event timing and lack of variation in seasonal flood conditions. h) Lack of data on changes in mainstem river water temperature during flood events.

CAUSES OF FLOODING Many of the analyses presented in the DEIS rely on models to estimate potential environmental effects. As with all models, the assumptions, input data, and methods affect model outcomes. There are differing perspectives regarding the underlying causes of flooding, flood damages, and solutions in the Chehalis Basin. These include discussions about the influence of forest practices, land use practices, and whether flood control infrastructure could alter development patterns or encourage building in flood-prone areas.

The FRE facility is not a solution to flooding in the basin. The solution is the "LAND Alternative"

(Local Actions Non-Dam Alternative). LAND is a proposed non-dam approach to flood reduction, focusing on levees, floodwalls, and land-use changes to protect communities like Centralia and Chehalis.