

Sierra Club Washington Chapter (Edward Humble)

Comment from the Washington Chapter Sierra Club. See attachment.



To: Washington Department of Ecology
From: Sierra Club Washington Chapter
Date: February 2, 2026

Re: Revised draft environmental review of proposed Chehalis River project

The Washington Chapter of Sierra Club appreciates the opportunity to submit the following testimony on the revised draft environmental impact statement (DEIS) for the Chehalis River Basin Flood Damage Reduction Project. We represent over 70,000 Sierra Club members working to advance climate solutions, act for justice, get outdoors, and protect Washington's lands, water, air, people, and wildlife.

While we understand the need to address flooding issues in the Chehalis Basin, we strongly oppose this flow-through dam option due to the overall environmental damage that would occur, particularly the impacts to fish and other wildlife, environmental justice aspects, and long-term changes to water flow. Simply put, the flow-through dam proposal is a mistake due to its overall effect on fish, particularly the near elimination of spring-run chinook salmon, coho salmon, and steelhead populations; the near elimination of water flow during construction, its minimal impact on flood control; and the disproportionate impacts on low-income communities. The result of this proposal, if completed, will lead to extinction of some salmon species and eliminate restoration efforts in the upper Chehalis River. The DEIS supports these findings in that it identifies a list of serious and unavoidable impacts to the basin from the construction of the facility and shows that the dam's construction would inundate the river upstream for 6.2 miles, leading to the loss of old growth forest, and the loss of critical spawning and rearing habitat. In summary, this project would be prohibitively expensive with estimates exceeding two billion dollars, would severely harm the environment and wildlife, does not address the tributaries below the proposed dam, and does not solve the flooding problem. The project must be consistent with treaty reserved and federally protected tribal rights and commitments.



It is critical to point out that the data shows this proposal would not have played a significant role in reducing damages from recent floods. The land alternatives (levees, raising and/or relocating of some structures) could provide a different solution that is more quickly implementable, arguably more capable of reducing flood damage, cause less impact on the environment and wildlife, and is far less expensive. This could be a part of a comprehensive strategy to solve the problem.

While there are many factors that have contributed to the issues we face today, a significant portion is due to development in the floodplain and years of logging operations. We believe these can be dealt with through appropriate planning and land use policies.

We appreciate the work that has been done thus far by the Chehalis Board and the Department of Ecology and are thankful for the opportunity to provide input. Much more needs to be done including changes to the DEIS to include a review of additional alternatives including:

- a review of the existing impacts from logging and logging roads and what could be done to mitigate those impacts,
- restoration efforts that could be implemented,
- the advantages and disadvantages of each of the land alternatives, and
- the impact of changes to zoning codes.

The Sierra Club would welcome the opportunity to provide expertise and be a part of the solution.

Regards,

Edward Humble Ph.D.
Chair, South Sound Sierra Club Group