

# JAY HORITA

To Washington Department of Ecology,

I'm submitting comments on the Revised Draft EIS for SEPA #202504854 regarding the proposal to construct a revised-design flood retention facility and associated temporary reservoir near Pe Ell (near RM 108 on the Chehalis River), along with changes to the Chehalis–Centralia Airport levee.

I urge Ecology and decision-makers to reject dam construction as the preferred path forward and to prioritize the Local Actions (non-dam) alternative and other distributed, basin-wide flood risk reduction actions. This is not because flood risk is unimportant—flooding is a real and growing challenge—but because the Revised Draft EIS itself describes a project that produces broad, lasting environmental harm while leaving unresolved questions about feasibility, mitigation, and risk.

## 1) Ecology's own "overall findings" show unacceptable, wide-ranging impacts

Ecology states that constructing and operating the flow-through dam and temporary reservoir would "significantly and negatively impact" a wide suite of resources, including fish and wildlife, aquatic and land habitats, wetlands, water, land use, Tribal resources, cultural resources, environmental health and safety, environmental justice, recreation, transportation, and public services/utilities.

When an EIS identifies such a comprehensive set of significant adverse effects, it is a strong signal that a large structural project at this location is the wrong tool—especially given the availability of distributed floodplain and community-scale actions that can be implemented sooner and adapted over time.

## 2) Fish impacts are not a side issue; they are central and compounding under climate change

Ecology reports that modeling shows the proposed facility would adversely impact salmon and steelhead trout populations, with impacts expected to be especially acute near the structure, and that climate change is projected to continue driving declines that the dam is likely to magnify.

In a basin where fish populations are already stressed, a project that is expected to worsen conditions at the pinch point (the structure area) is hard to justify as "balanced," even before considering construction-phase effects (dewatering, sediment/turbidity, habitat disturbance) that commonly accompany projects of this type.

## 3) "Mitigation uncertainty" is not acceptable at this scale—final EIS should not defer feasibility

Ecology's own summary makes a crucial admission: the Revised Draft EIS includes mitigation measures proposed by the Flood District and agencies, but does not analyze whether those measures would be effective or feasible, and explicitly identifies this uncertainty.

For a project with the scope and risk profile described, deferring mitigation feasibility to later permitting/design phases is not enough. In the Final EIS, Ecology should:

Evaluate technical feasibility, economic feasibility, and enforceability of proposed mitigation (not

just list it).

Identify which impacts remain significant and unavoidable even after feasible mitigation.

Clearly state whether the project can meet its goals without unacceptable and unmitigable harm—and if not, the Final EIS should say so plainly.

#### 4) Earthquake/failure consequences must be treated as more than a footnote

Ecology notes that while a large earthquake is "highly unlikely," if ground shaking occurred while the reservoir was holding water and the dam failed, downstream impacts would be significant to people, buildings, roads, and the environment.

This is exactly why large, centralized infrastructure can increase systemic risk: you may reduce one category of hazard under certain scenarios, while introducing a low-probability but high-consequence failure mode. The Final EIS should more explicitly evaluate (and quantify to the extent practicable) residual risk, emergency response realities, and downstream consequences—especially given that the project is intended to operate during extreme events.

#### 5) The Final EIS must more clearly compare the dam proposal to non-dam approaches on outcomes, not just narrative

Ecology states the revised draft analyzed a No Action and a Local Actions alternative. To support informed decision-making, the Final EIS should present a clearer, apples-to-apples comparison for:

Flood-risk reduction benefits by community and scenario (major/catastrophic/recurring),

Time-to-implement and adaptability under changing climate projections,

Full lifecycle costs and long-term liabilities,

Environmental and Tribal/cultural impacts (including which are avoidable only under the non-dam approach).

#### 6) Requested outcome

Given Ecology's stated findings of broad significant negative impacts, the unresolved mitigation feasibility, and the compounding fish/climate concerns, I request that Ecology:

Strengthen the Final EIS with a feasibility/effectiveness assessment of mitigation and a clearer significance determination after feasible mitigation;

Present a more outcome-based comparative analysis between the dam proposal and the Local Actions alternative; and

State clearly whether the dam proposal can proceed without creating significant and unavoidable impacts to key public resources (fish, wetlands/water quality, Tribal and cultural resources, and

environmental justice). If not, the responsible conclusion is to move away from dam construction and focus on distributed, non-dam flood reduction that can protect communities without permanently degrading the river system.

Thank you for considering these comments and for incorporating substantive, science-based public input into the Final EIS.