Brendan Mason

I'm submitting this comment in opposition to the proposed flow-through dam (Flood Retention Expandable facility) and associated airport levee changes. I support meaningful flood-risk reduction in the Chehalis Basin, but not at the price—and risk—described in the State's own analysis.

Ecology's revised draft EIS is unusually clear about the core problem: the project would create significant adverse environmental impacts across a wide set of resources, including fish and aquatic habitat, water quality, wetlands, transportation, land use, tribal and cultural resources, environmental health and safety, environmental justice, and public services. ([ecology.wa.gov][1]) Ecology's modeling also indicates the project would adversely affect salmon and steelhead, and that climate change will continue to drive declines—with the dam likely to magnify those impacts. ([ecology.wa.gov][1]) That is not a "tradeoff" I'm comfortable asking the public, Tribes, or future generations to carry—especially when the project is explicitly not intended to stop regular annual flooding and will not address flooding in all parts of the basin. ([ecology.wa.gov][1])

1. The EIS documents major harms, then admits mitigation may not be feasible
The revised draft EIS states that mitigation measures are proposed, but it did not analyze whether mitigation would be effective or feasible, and it flags that uncertainty. ([ecology.wa.gov][1]) That's a big gap for a project of this scale and complexity. When the State is already concluding "significant and negative" impacts across so many categories, pushing the hardest questions into later permitting is backwards. If the project can't be credibly mitigated—technically and economically—then it should not proceed.

2. High cost, uncertain funding, and a mismatch between price and outcome
The publicly stated cost range is enormous: roughly $1.3–$2.3 billion. Even proponents acknowledge the dam won't stop all flooding, and it's designed to operate for major/catastrophic events rather than the recurring floods people actually experience year after year. ([chehalisriverbasinfczd.com][2]) Meanwhile, the "benefits" being marketed (acres avoided inundation, structures removed from flooding, reduced closures) are precisely the kinds of results that can often be achieved with targeted basin-wide measures—without placing a large, single-point-of-failure structure in the river and then attempting to engineer our way out of its ecological consequences for decades. ([ecology.wa.gov][1])

If decision-makers insist on keeping a dam option on the table, the public deserves a transparent financing plan (not just a conceptual "it will save money") and an apples-to-apples comparison of lifecycle costs, risks, and outcomes versus non-dam alternatives. Right now, the project reads like a very expensive way to buy partial flood relief while locking in permanent ecological and cultural damage.

3. Fish passage and "trap-and-haul" is not a real substitute for a functioning river
The project description leans heavily on the claim that the river "flows through" most of the time, with fish passage features and trap-and-haul during flood operations. But the EIS summary indicates the opposite of reassurance: adverse impacts to salmonids, reduced genetic diversity, and broader impacts to aquatic species. ([ecology.wa.gov][1]) Even if structures allow some movement "most of the time," the events that trigger operation (major floods) are exactly when the river's natural processes matter—sediment, wood recruitment, channel formation, temperature and

dissolved oxygen dynamics, and connectivity. Ecology specifically notes impacts from eliminating peak downstream flows that are important for channel formation and habitat processes, along with increased temperature and reduced dissolved oxygen from vegetation loss and reduced shading. ([ecology.wa.gov][1])

"Flow-through dam" is a comforting label. The reality is still a massive control structure with gates, an intermittently inundated reservoir footprint, and long-term operational consequences imposed on an already stressed system.

4. Tribal rights, cultural resources, and environmental justice must be treated as constraints, not afterthoughts
Ecology's summary indicates significant impacts to Tribal cultural and natural resources. ([ecology.wa.gov][1]) Tribes have been clear that treaty rights and cultural resources are on the line, and that the revised alignment was driven in part by cultural concerns. ([quinaultindiannation.com][3]) The right frame here is not "how do we mitigate impacts to an acceptable level," but "should the State advance a project that knowingly threatens treaty-reserved resources and cultural landscapes when other approaches exist."

5. Prioritize the Local Actions alternative and basin-wide resilience that can start now
Ecology's page states the revised draft EIS also analyzed a "local actions" alternative based on localized and nonstructural actions to retain floodwaters and reduce flood-related damage. ([ecology.wa.gov][1]) Those are the kinds of measures that (a) distribute risk reduction across the basin instead of concentrating it at one mega-project, (b) can be phased and adapted as climate projections change, and (c) can be implemented sooner than a project that—by Ecology's own estimate—could start construction around 2030 after years more process and permitting. ([ecology.wa.gov][1])

My request to Ecology and to decision-makers using this EIS is straightforward:

• Do not advance the dam alternative as part of the long-term strategy recommendation.
• Emphasize and fund the Local Actions/non-dam approach, including floodplain reconnection and restoration, targeted infrastructure improvements, voluntary elevation/relocation where appropriate, and land-use policies that stop compounding risk. ([ecology.wa.gov][1])
• If the dam remains under consideration, require a rigorous, public, technically grounded demonstration—before any permitting path proceeds—that proposed mitigation is feasible, fundable, and likely to achieve measurable outcomes for fish populations, habitat function, and treaty resources (not just design intent). ([ecology.wa.gov][1])
• Provide a transparent funding and cost-risk plan that includes overruns, long-term operations, failure/earthquake risk scenarios, and enforcement/accountability if predicted mitigation performance is not achieved.

Flooding in the Chehalis Basin is real and damaging. That doesn't justify building a project that Ecology's own analysis says would significantly and negatively impact fish, habitat, water, and Tribal resources, while still leaving the basin with ongoing flood risk. ([ecology.wa.gov][1]) We should pursue solutions that reduce flood harm without sacrificing one of Washington's remaining wild river systems.

Thank you for considering my comments.

[1]:
https://ecology.wa.gov/ecologys-work-near-you/river-basins-groundwater/chehalis-basin/chehalis-floc
"EIS - Washington State Department of Ecology"
[2]: https://chehalisriverbasinfczd.com/ "Flow-Through Dam :: Chehalis FCZD"
[3]: https://www.quinaultindiannation.com/223/Chehalis-Basin-Strategy "Chehalis Basin Strategy |
Quinault Indian Nation, WA"