

## Eastside Audubon (Jeremy Lucas)

Hello, Eastside Audubon opposed the Chehalis River Basin Flood Reduction project. Please find out comments attached.

-Jeremy Lucas



Eastside Audubon  
P.O. Box 3113  
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SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project  
c/o Bobbak Talebi  
P.O. Box 47775  
Olympia, WA 98504-7775

**RE: Opposing the Proposed Chehalis River Basin Flood Damage Reduction Project (SEPA # 202504854)**

Dear Mr. Talebi,

Thank you for allowing us to comment on the Draft Environmental Impact Statement (DEIS) for the Proposed Chehalis River Basin Flood Damage Reduction Project (SEPA # 202504854). We are the Eastside Audubon Society (EAS), a local independent chapter of the National Audubon Society. We approximately 1,300 members that live within our service area, which is defined by much of King County Washington from the eastern shores of Lake Washington all the way east to the Cascade Mountains crest, south from the Cedar River to the border with Snohomish County.

Our position is clear: **EAS opposes this plan which would involve building a flow-through dam upstream from Pe Ell, Washington and raise the levee of the Chehalis-Centralia Airport further downstream.** By this report's own admission, this project will have "significant adverse impacts on the environment". Those impacts will serve as long-term or permanent stressors on the wildlife and communities that call Washington State home.

The Chehalis River Basin is the second largest river basin in Washington State, after the Columbia River. The Chehalis has strong runs of various species of salmonids including Chinook, coho, and chum. Despite development all along the river, there are to date no salmon runs listed as endangered in this river, a novelty among Washington State river systems. This report highlights future modeling of these salmon runs in response to climate change. The modeling



shows that even with no action taken, many of these runs will see population declines. This will be exacerbated by the construction of this project.

In the Summary section of this DEIS, the statement was made that “...salmon runs are in serious decline” and “Communities in the basin are working with Chehalis Basin Board on a long-term strategy to address these two challenges...”. None of the projects related to salmon recovery are addressed in this DEIS and are outside of the scope of this report. This report clearly states that this project will have negative impacts on salmon, and this language should be removed from future iterations of the DEIS.

Reservoirs, even temporary ones, can raise the temperature of the river as this report projects will happen to the Chehalis River. The rainy months, when the river is most likely to flood and trigger the closure of those gates is also the time that potentially all species of salmon will be in the river. Warm water is harmful to salmonids having, in particular, negative impact on the productivity of their redds. Further, warmer temperatures can increase the success rate of predators that prey upon juvenile salmonids. Many of those predators that see increased success are non-native. An example of this is what is happening to Lake Sammamish kokanee, a subspecies of non-anadromous sockeye salmon.

We do not believe the characterization of this project having a “less than significant adverse impact” on endangered Southern Resident orcas is correct. First, as this report notes, the importance of salmon originating from the Chehalis River for Southern Resident orcas is unknown. Second, in 2025, Southern Resident orcas spent more time in the open Pacific Ocean and less time in the Salish Sea looking for salmon. Grays Harbor, where the Chehalis River terminates and enters the Pacific Ocean, is within the habitat range of Southern Resident orcas and all adverse impacts to salmon should be minimized, especially as the numbers of salmon as a whole are expected to decrease in the face of climate change. The Washington State Department of Ecology’s webpage dedicated to providing information on protecting Southern Resident orcas notes that protecting and restoring the Chehalis River is a priority item. NOAA also has documented Southern Resident orcas feeding around Gray’s Harbor, which is where the mouth of the Chehalis River is located.

A major concern of ours is the impact on endangered marbled murrelets, which can nest in the area. Marbled murrelets rely on old growth trees to nest and lay their one egg. Removal of trees due to mortality, creating infrastructure, and other construction and operating needs will impact valuable and increasingly shrinking old-growth habitat needed by these endangered seabirds. Further, habitat fragmentation and human activity bring in a higher number of corvids like Steller’s jays and American crows, which harass murrelets at nest sites and feed on eggs.



This project is inconsistent with recent investments and federal projects in dam removal to restore salmon habitat. At a time when large amounts of spending are being directed to large-scale dam removal projects like those on the Elwha and Klamath, this project would directly contradict that goal. While we do acknowledge that this project would lessen the impacts of flooding throughout the basin, the report states that flooding would still occur around the city of Chehalis and other areas from the FRE. The dam's gates would not close until a major flood event, one in which the river flows at speeds of at least 38,800 cubic feet per second was, forecasted. Neither of the last two major flood events reached that threshold, meaning the dam would not have closed and would have alleviated the floods. In addition, the most recent flood had major water inputs from the Cascade foothills, which would have further limited the dam's effectiveness. Therefore, this project would impose a very high environmental price for a solution that does not fully address the flooding problem.

Again, thank you for allowing public comment and considering our remarks as part of this process. Our position is clear: Eastside Audubon opposes the construction of the flow-through dam on the Chehalis River whose construction and seasonal impounding of river water would have significant adverse effects on the environment. In an era where environmental impacts will be exacerbated by climate change, we should be prioritizing protecting species, restoring habitat, and encouraging responsible future development.

Sincerely,

Jeremy Lucas  
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