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Appendix N, Table N-19 on page 73 contains erroneous information which will mislead decision makers. I will attempt to show you why this is so.

FIRST POINT TO MAKE: Table N-19 uses average river flowrates over the past 47 years. It has been my experience on the river above Pe Ell for the past 87 years that the summer flows have dramatically declined over the past few years, and that using 47yr averages does not provide an accurate picture of what summer flowrates might be in the future (climate change etc).

So I decided to examine the last 10 years of summer flowrates to see how they compared with the 47-year averages presented in the EIS.

I took the flowrate from the Doty Gauge on the first day and last day of July, August and September for the past 10 years and compared it with the EIS 47-yr average for that month. This is what the Doty Gauge numbers revealed:

(It appears that the format of the data will be lost during transmission. In that case, I will send a correct hard copy in the mail)

Jul 1 Jul 31 EIS Ave Aug 1 Aug 31 EIS Ave Sep 1 Sep 30 EIS Ave
2025 39cfs 21cfs 66cfs 20cfs 20cfs 40cfs 19cfs 49cfs 74cfs
2024 103 47 66 47 26 40 26 26 74
2023 42 24 66 25 28 40 28 mostly 16 74
2022 147 51 66 51 29 40 28 31 74
2021 62 27 66 27 21 40 21 mostly 18 74
2020 87 35 66 33 24 40 24 29 74
2019 46 27 66 27 17 40 17 86 74
2018 50 27 66 27 29 40 29 38 74
2017 80 38 66 37 25 40 25 35 74
2016 52 29 66 29 21 40 42 25 74

These numbers reveal two significant conclusions:
1. The EIS averages for the past 47 years ALWAYS show that the Doty Gauge flowrates are above the mandated level of 31 cfs (for fish survival). The actual Doty Gauge data for the past 10 years reveal that the flowrates have been below the legislative-mandated 31 cfs EVERY summer. The EIS data significantly misleads decision makers to conclude there is plenty of summer water at the Doty Gauge when in fact the flowrates are below the mandated 31cfs...and legally, water removal is forbidden.

2.The second conclusion is that 52 of the 60 data points show that river flowrates have dramatically gone down in the past 10 years. 87% of the summer flowrates were significantly lower than the 47-yr average presented in the EIS.

Look at the August 2025 flowrate of 20cfs compared to the EIS average of 40 cfs. The actual flowrate in 2025 was 50% of the 47-yr average.

Look at the September 2024 flowrate of 26cfs compared to the EIS 47-average of 74cfs. The actual flowrate in 2024 was 35% of the 47-yr average.

This data clearly proves that river flowrates fall below the mandated 31 cfs every year for the past 10 years. And this data strongly suggests that the last 10 years of summer flowrates provides a more compelling snapshot of current summer flows than the 47-yr averages presented in the EIS.

MAJOR ERROR NUMBER TWO: Table N-19 uses flowrates at the Doty Gauge to determine available water for construction when the ACTUAL FLOWRATES at the Dam site are lower. The dam is approximately 6 miles upstream from the Doty Gauge. There are 12 creeks which flow into the Chehalis river within that span of 6 miles. A few years ago there was a gauge on the new bridge which replaced the historic tin bridge near the dam site. That gauge was operated for 2 years and produced flowrates which were 60 to 70% of the Doty flowrates.

By using flowrates at the dam site instead of the Doty Gauge, decision-makers will find a completely different story than the false data presented in the EIS. To obtain flowrates at the dam site, Doty numbers must be multiplied by 0.7.

The following numbers reveal how the EIS has erroneously minimized the environmental impact of withdrawing water during summertime construction when water is at its lowest. The Doty Gauge median value for each month was obtained from the chart presented above. That Doty median number was multiplied by 0.7 to obtain the approximate monthly flowrate at the dam site.

The EIS states that the average rate of withdrawal for construction purposes will be 3.7 cfs.

The data presented below shows that the corrected percent of river withdrawn are considerably higher than the false EIS values. Decision-makers should use the corrected % withdrawals at the dam site rather than the false lower percentages in the EIS. Note that water withdrawals would be as high as 26% if the dam were being constructed now.

	July			August			September		
	Doty	Dam	EIS	Doty	Dam	EIS	Doty	Dam	EIS
2025	30cfs	21cfs	66cfs	20cfs	14cfs	40cfs	34cfs	24cfs	74cfs
% taken		18%	6%		26%	9%		15%	5%
2024	75cfs	52cfs	66cfs	36cfs	25cfs	40cfs	26cfs	18cfs	74cfs
% taken		7%	6%		14%	9%		20%	5%
2023	33cfs	23cfs	66cfs	27cfs	14cfs	40cfs	22cfs	15cfs	74cfs
% taken		16%	6%		26%	9%		25%	5%
2022	99cfs	69cfs	66cfs	40cfs	28cfs	40cfs	30cfs	21cfs	74cfs
% taken		5%	6%		13%	9%		18%	5%
2021	44cfs	31cfs	66cfs	24cfs	17cfs	40cfs	19cfs	13cfs	74cfs
% taken		12%	6%		22%	9%		28%	5%
2020	61cfs	43cfs	66cfs	28cfs	20cfs	40cfs	26cfs	18cfs	74cfs

% taken 9% 6% 18% 9% 20% 5%

2019 36cfs 25cfs 66cfs 22cfs 15cfs 40cfs 52cfs 36cfs 74cfs
% taken 15% 6% 25% 9% 10% 5%

2018 38cfs 27cfs 66cfs 28cfs 20cfs 40cfs 33cfs 23cfs 74cfs
% taken 18% 6% 18% 9% 16% 5%

2017 59cfs 41cfs 66cfs 31cfs 22cfs 40cfs 30cfs 21cfs 74cfs
% taken 9% 6% 17% 9% 18% 5%

2016 40cfs 28cfs 66cfs 25cfs 18cfs 40cfs 34cfs 24cfs 74cfs
% taken 13% 6% 20% 9% 15% 5%

These numbers show that as much as 26% of the river flow would be pumped out for summertime construction. Most of the actual percentage pumpouts are 2 to 3 times higher than the false (lower) percentages in the EIS. Pumping out 10 to 26% of the river should be considered a significant environmental impact which should be addressed properly in the EIS.

Mitigation is simple but costly. During summer months, haul construction water from another river basin. This would require up to 100 double-tanker trips per day every year from May through October. This would increase costs by approximately $100 million and significantly increase truck traffic through Pe Ell. These environmental impacts need to be stated in this draft EIS.

There is one more operational risk to consider. If you put yourself into the reality of hectic dam construction activities where a new worker was told to turn on the pump to pump as much water as needed, he might pump the river dry in minutes for several hours. My experience in reviewing large construction projects across the country is that these simple errors with construction workers occasionally happen.

The simple way of preventing the river from accidently being pumped dry is to forbid all water removal during the summer months.