

COL (Ret) Ronald Averill

My comments are contained in the attached Letter.

February 4, 2026

SEPA Revised Draft EIS for Chehalis Flood Damage Reduction Project
c/o Bobbak Talebi
Southwest Region Office
P.O. Box 47775
Olympia, WA 98504-7775

RE: Proposed Chehalis River Basin Flood Damage Reduction Project

Dear Mr. Talebi:

I am COL Ronald H. Averill, U.S. Army Retired, and a former County Commissioner for District 1 in Lewis County, Washington. I served as a County Commissioner from November 28, 2006, to December 31, 2012, during the period of the 2007 and 2009 floods and the subsequent recovery period. I am abundantly familiar with flooding in the Chehalis River Basin and the many project studies to mitigate incessant flooding on the river.

Flooding is endemic to the Chehalis River Basin and over 200 studies have been conducted by various government agencies recommending flood mitigation measures; however, none were implemented to fruition. The reason is that almost all proposed solutions in the upper basin without regard to impacts on the middle and lower basin. In the aftermath of the 2007 flood, I became a prime proponent of finding a solution that would be acceptable to the entire basin and not impose adverse impacts above or below proposed mitigation solutions. In 2008 the State Legislature passed a bill forming the Chehalis River Basin Flood Authority and I chaired that entity for its first three years of existence. All the former projects failed, and I am determined to see the current effort succeed.

We found out early that finding an acceptable flood mitigation solution faced extensive barriers from aquatic species restoration advocates. Those barriers nearly doomed the Flood Authority efforts until Governor Gregoire stepped in forming the Governor's Chehalis Basin Work Group which later evolved through legislation into the Department of Ecology's Office of the Chehalis Basin. While the Flood Authority became the mechanism of finding a basin wide flood mitigation solution, the Working Group and the OCB became the mechanism of finding a basin wide solution to aquatic species restoration with its dual charge of finding both a flood mitigation solution and an aquatic species restoration solution, with both sides receiving equivalent funding.

Therein lies the problem I have with the Revised SEPA Draft. Your document focuses almost exclusively on impacts upon aquatic species restoration and the impact the authors perceive from the proposed FRE dam. But the charge given to the OCB is to find a solution to not only aquatic species restoration but flood mitigation as well. Since the two objectives are in direct contravention in many areas, it should become abundantly clear that compromise will need to occur to find a solution that satisfies both sides.

The 2008 Flood caused extensive damage estimated to be nearly one billion dollars for communities in the Chehalis River Basin and commerce losses for the State of Washington. Lewis County had extensive losses with three bridges destroyed on SR 6 and the Centralia-Chehalis Airport levee was broken. Forest trees and slash was dumped on farms along with massive sterile sediment, farm fences were destroyed, and over 1800 head of livestock died. Hundreds of homes were damaged and/or condemned due to flooding, many of them in rental neighborhoods, where low-income renters were left homeless. Commercial losses due to business flooding were in the millions of dollars.

These losses are occurring with increased frequency and scientists tell us storms will be more frequent and more destructive in the future. Our population that is suffering these losses are demanding a solution from their government.

We are not impervious to the problem of aquatic species restoration. Since the passage of the Salmon Recovery Act by the State Legislature in 1996, all the counties in the Chehalis Basin have completed required recovery plans and completed hundreds of projects to restore habitat with projects completed by our Public Works Departments, Conservation Districts, and the Aquatic Species Restoration Program under the management of the OCB. While many other River Basins lost funding when state salmon recovery funds were redirected to the Puget Sound Clean-up, funding from the counties, conservation districts and ASRP projects have been robust in the Chehalis River Basin. We are committed to the success of the ASRP commitment of the OCB.

However, we are also committed to finding a successful flood mitigation solution. In a major storm we have seen 330,000-acre feet of water back-up in the upper basin. We have numerous levees to protect vulnerable population areas; however, many are not built to withstand 100-year flood levels. The problem we have is that the valley in the basin is narrow, and we cannot find sufficient space to store 63,000-acre feet of water to keep the levees effective during a storm. The only effective way is to build a dam. We know dams cause a problem for aquatic species' habitat; however, the proposed FRE dam has been designed to mitigate that impact. The design has significantly changed since the original SEPA, and we continue to revise the plan as we learn about new challenges that need to be mitigated. This dam is as fish friendly as one

can get since it is free flowing except for major storms. In the last decade only two or three events may have triggered closing the dam. The fact is we cannot eliminate all the impediments to aquatic species restoration caused by the dam; however, we are the second largest river basin the state of Washington, and there are over 300 tributaries where restoration is taking place. To comply with both flood mitigation and aquatic species restoration of the OCB we are going to need to find some compromises. I believe we will more than offset the remaining restrictions of the dam with vastly improved restoration already completed or taking place on the river.

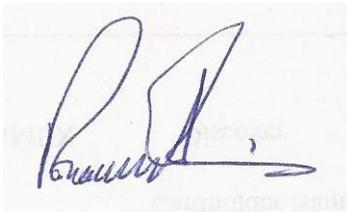
Our environment has been evolving for thousands of years from both natural causes and human impacts. Our current private and government infrastructure has developed over hundreds of years and proposals to restore the river flood plain to its natural condition would cost trillions of dollars to accomplish. We must work with what we have to solve problems using practical solutions. The SEPA needs to address the pros and cons of both objectives to help decision makers find appropriate solutions.

Below are specific concerns I have with the Revised Draft SEIS:

- The SEIS mentions what flood mitigation efforts have been proposed but only address potential adverse aspects of the FRE on aquatic species. Interestingly they do not mention that fish are impacted by flooding if they cannot get back to the river when the water recedes. Nor do they mention that the FRE can provide mitigation during such an event.
- The SEIS admits that the mitigation proposed for the FRE was not addressed. Since they were not, it makes one wonder if their concern for needed mitigation was based on the original dam design, which is no longer on the table. The new design has been in progress for over five years and has been briefed to the Chehalis Basin Board and associated OCB staff and state agencies on numerous occasions. If this is a revised SEIS should it not be reasonable to address the impact of FRE proposed mitigation measures?
- They also do not mention that underserved populations are subject to far worse adverse impacts from flooding when their homes in flooded areas are rendered uninhabitable than they are by unmitigated impacts on aquatic species caused by the FRE.
- The SEIS summary makes a big case about the FRE causing irreparable damage to aquatic species should it be breached during a seismic event, albeit they admit it is unlikely. Such events occurring when the FRE is closed and full of water are statistically infinitesimally remote since the FRE would only be closed when a huge atmospheric river is imminent.
- While Dams are targeted by environmental groups because of their impact on aquatic species, the technology to limit impact on fish passages through or around dams has improved by light years. The Lewis County PUD dam on the Cowlitz River at Cowlitz Falls built in the 1990's, and the Cosmopolis Dam on Mill Creek are excellent examples. The

FRE will be even better because it will provide unobstructed fish passage 99% of the time. Also, dams do have benefits, and the Nisqually Tribe has demonstrated how mitigation for the two dams on the Nisqually River has been successful.

- The OCB/CBB, and their predecessors, have been studying flood and aquatic species mitigation for over fifteen years, and the only way to get enough storage to mitigate flooding during a major storm is a dam. Studies by the Chehalis River Basin Flood Authority, and OCB, have not discovered an alternative. The LAND study concentrates predominately on the greater Centralia area and only provides more levies, not additional storage, at a \$2 billion cost. It does not address all the problems in the upper basin, much less the middle and lower basin, and if it did that would only add to the cost. The fact is that the alternate methods of sufficient water storage during a major storm do not exist in the narrow valleys and foothills of the Chehalis River Basin.

A handwritten signature in blue ink, appearing to read 'Ronald H. Averill', is written over a light blue grid background.

RONALD H. AVERILL
Colonel, U.S. Army Retired