January 14, 2026

SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project
c/o Bobbak Talebi,
Southwest Region Office
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Thank you for the opportunity to participate in the outcome on the SEPA Revised Draft EIS (REIS) for the Chehalis Flood Damage Reduction Project. We appreciate that this is a very complex project and hope our input will be of assistance in making decisions that will have long-term benefit for the environment, residents and visitors of the Chehalis Basin Watershed.

FOGH is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

We incorporate by reference comments submitted by the Quinault Indian Nation, the Confederated Tribes of the Chehalis Reservation, Audubon Washington, Grays Harbor Audubon Society, Twin Harbors Waterkeeper, Earth Ministry, Wild Salmon Center, Conservation Northwest, South Sound Sierra Club, Washington League of Women Voters, American White Water, Orca Network, Orca Conservancy, Pacific Rivers, Wild Fish Conservancy, Chehalis River Alliance, David E. Ortman, and Wild Steelhead Coalition. In addition, we incorporate by reference our previous FOGH Scoping and DEIS comments.

As we have commented before, the Chehalis basin drains 2,660 square miles and is broken into two separate WRIAs, the upper 23 and lower 22, which empty into the Grays Harbor Estuary and the Pacific Ocean. It goes without saying that what happens upstream affects the ecology of those waters downstream. As a result, the water-quality, water-quantity and timing of flow are of significant importance to the health and economic vitality of the region.

We continue to be concerned that consideration is given to any sort of dam or water retention configuration and strongly oppose that as a solution, partial or in whole. Dams have proven to be destructive to salmon and steelhead runs and present unintended consequences that cannot be mitigated. More than 40 percent of the spawning and rearing habitat once available to salmon and steelhead in the Columbia River Basin is permanently blocked by dams. The Chehalis River is a major Pacific Northwest salmon stream and is the second largest river basin in Washington State. Its runs are vital for ecological balance, cultural heritage, economic stability, and conservation efforts in the region.

We believe that the Revised Environmental Impact Statement (REIS) is woefully inadequate and effectively presents illegal segmentation (the illegal piecemealing of a project into smaller parts to avoid comprehensive environmental review) of the project. Under the Washington State Environmental Policy Act (SEPA), agencies must analyze the "entire proposal" and cannot break a project into smaller pieces if they are related or interdependent (WAC 197-11-060). As pointed out by the Quinault Indian Nation and Twin Harbors Waterkeeper, the DEIS improperly segments the project by focusing narrowly on the dam while separating it from the broader Chehalis Basin Strategy. As such, the REIS focuses on the flood retention facility (dam) but often treats the *Aquatic Species Restoration Plan (ASRP)* as a separate, elective effort rather than an essential mitigation component of a single integrated basin strategy. The REIS ignores the cumulative "downstream" impacts and the necessity of basin-wide local actions that are being analyzed separately. The public cannot effectively compare the two as part of one unified decision-making process and should be withdrawn for lack of alternatives.

Our further concens include, but are not limited to:

1. According to USGS there is a 52.82% probability of a 5.0 or greater earthquake in the Pe Ell area, and less than 50km away in Chehalis that becomes a 67.24% probability in the next 50 years. *If the dam were in place, what would be the potential impact (human, tribal, ecological, financial, water quality), at site and downstream, of a failure if the reservoir were 25% filled, 50% filled, 75% filled or 100% filled?*

2. *Given the instability of the substrate of the area, what would be the potential for liquefaction?*

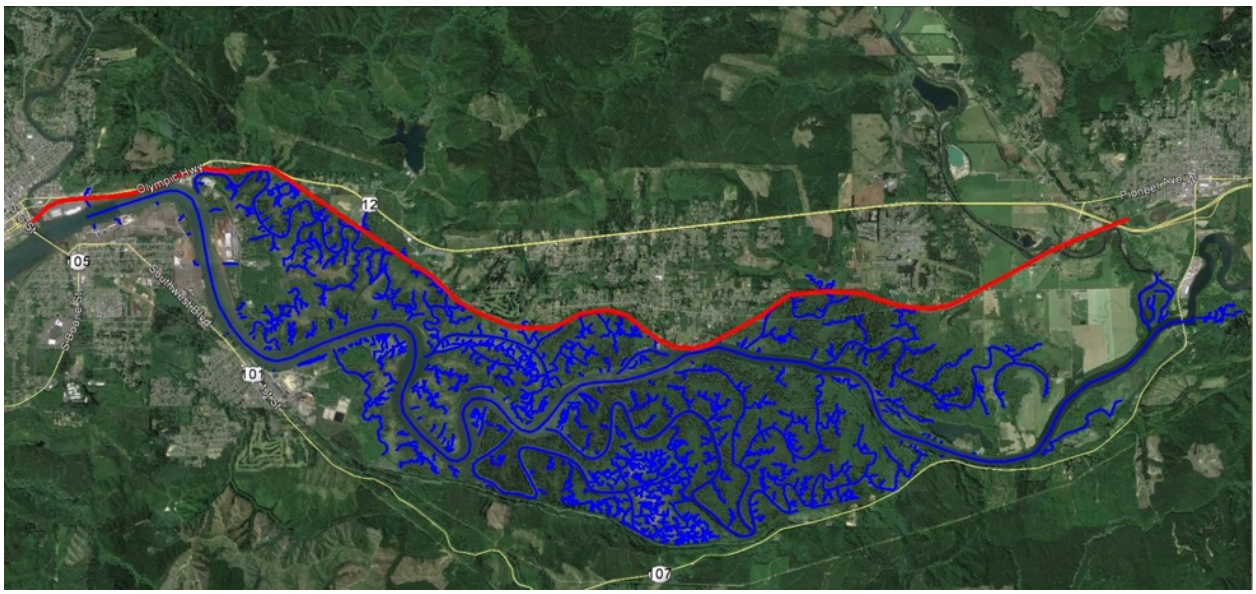
3. The REIS confirms that while the applicant (the Flood Control District) moved the dam site 1,000 feet upstream to avoid certain cultural sites, the overall environmental "signature" has actually worsened in several categories due to the increased scale of the facility. The REIS admits that the "flood retention expandable" (FRE) facility is not truly "flow-through" in an ecological sense. Even with the gates open, the structure constricts the river and creates a "velocity barrier" that exhausts migrating fish. *What would be the cumulative exhaustion of salmonids attempting to navigate the artificial conduits, even during non-flood years?*

4. *How would this velocity barrier affect other species?*

5. The facility would permanently change the river channel at the site. Closing of the dam would interrupt the main stem flow. *What would be the effect of this reduced flow on the downstream streams, rivers and tributaries?*

6. *What would be the potential scour and habitat loss at each of the downstream sites, and the cumulative effect to streambed, gravel beds, aquatic species?*

7. Allowing the basin below the dam site to empty faster will create a potential for erosion, turbidity, and modified sediment transport. *How will this affect the over 136 miles of tidally influenced shorelines of the Chehalis Surge Plain?*



Chehalis Surge Plain, waterways in blue, rendering by J F-B

8. *If the tributaries, streams and rivers empty more quickly with the dam closed, what will be the effect to salmon redds and habitats located in each of those water bodies?*

9. Treaties of the 1850s secured some 64 million acres of land to the federal government from Pacific Northwest indigenous people, in exchange for certain guaranteed rights to taking fish, hunt and gather at all usual and accustomed grounds and stations and to provide the wildlife habitat to which they require to survive. The treaty tribes, e.g., Quinault Indian Nation, and others such as the Confederated Tribes of the Chehalis and Shoalwater Bay Tribe depend upon the delicate balance that nature provides to sustain their culture and sustenance. The natural flow of waters during flood events depends upon healthy and natural storage of wetlands and riparian areas. If the dam were to be built, modeling suggests that spring-run Chinook upstream would be extinguished. The project would also reduce genetic diversity for fall-run Chinook, coho, and chum salmon. *What would be the cost of an endangered species prohibition to tribal, commercial and recreational fishers? Could this also affect Steelhead, eel, and Bull Trout populations?*

10. The REIS acknowledges significant and unavoidable impacts to salmon and steelhead. Specifically, the loss of genetic diversity in the upper Chehalis basin will serve as a 'death knell' for the recovery of Spring Chinook, a primary food source for the endangered Southern Resident Killer Whale. *How would this affect NW resident and transient whale populations?*

11. *What would be the overall financial burden and who would be responsible for that burden?*

12. Important areas of archaeological and cultural importance to local Tribes are located within the path of dam construction and potential dam failure (as noted above in item 1). *What would be the cost of reimbursement if this were to happen?*

13. Removal of shade covering provided by trees could raise water temperatures in the Chehalis by up to 5.4° F, and up to 9.0° F in Crim Creek. *This is harmful or lethal to salmon, what about other aquatic species? What would be the financial impact to the human, wildlife ecosystems if water temperatures are raised and/or shade is removed? During water release how would this affect downstream fish populations?*

14. Construction of the dam would permanently remove 600 acres of forest land. When the dam is closed during floods, the resulting reservoir would inundate approximately 847 acres, killing the remaining trees and vegetation through drowning. *Once the area has been cleared, what management techniques will be using to control invasive vegetation from growing in the reservoir area?*

15. *Will pesticides, herbicides and fungicides be used?*

16. *How much? How often?*

17. Please discuss how much untreated runoff from the proposed project would enter the stream flow. *What is the potential for chemical leaching into the river and tributaries?*

18. *How will this affect wildlife and aquatic species within the reservoir and downstream?*

19. The slopes surrounding the "temporary reservoir" are geologically unstable. *How would these cuts be stabilized?*

20. During drawdown as the dam empties after a major rain event those sides could trigger major landslides. This would dump tremendous amounts of sediment into the river and possibly overtop the dam in the process, damaging the structure itself. *What would be the cost of such an event?*

21. Forestry and forest practices have long dominated the area of selected for the position of the dam. *What alternatives to existing practices of the surrounding area will be provided to mitigate the loss of function and value of the prior land use?*

22. Land use and filling of wetlands and the flood plain are presumably controlled and modified by County land use plans, critical area ordinances, comprehensive plans and State and Federal regulations. *What modifications to these regulations would be necessary to implement the dam and insure no net loss?*

23. *What modifications to the above regulations would be needed to mitigate for downstream impacts created by the dam as flow through, and if closed and presents an interrupted flow to the main stem, and increased flow to downstream rivers, streams and tributaries?*

24. *What would be the cumulative effect of these impacts?*

25. Sediment distribution will be trapped behind the dam preventing the natural flow and distribution downstream. *How will this the alter downstream habitats, particularly for species that rely on certain types of riverbed conditions for spawning and feeding?*

26. The REIS is inadequate because it lists proposed mitigation measures without analyzing their feasibility or probability of success. It treats 'potential' mitigation as a certainty, which violates the requirement for a rigorous environmental review. *What would be the feasibility and/or probability of success for the proposed mitigation?*

27. *What would be the feasibility or probability of success of the LAND (Local Action Non-Dam) alternative program were substituted?*

28. The REIS shows the dam only protects a small portion of the basin and does not stop regular annual flooding, yet it ignores the high-efficiency potential of the LAND (Local Actions Non-Dam) Alternative to protect more structures basin-wide. *What would be the cost differential between these two approaches?*

29. The REIS acknowledges that the proposed dam is a "stationary" solution being applied to a "dynamic" climate crisis. By the time the project is completed, the 62,000 acre-feet of storage capacity will already be losing its effectiveness against the increasingly frequent and intense atmospheric rivers documented in the 2025 climate update. In contrast, the Local Actions Non-Dam (LAND) alternative provides a permanent, scalable solution by removing high-risk assets from the floodplain entirely and restoring natural flood-attenuation zones like the Chehalis Surge Plain. While the dam creates a permanent "single point of failure" and a "significant and unavoidable" extinction risk for Spring Chinook, the LAND alternative offers a path to basin-wide resilience that supports, rather than destroys, the ecological and economic vitality of the Grays Harbor Estuary. *Compared together what is the cost-benefit?*

30. *Based on this disparity, how does the Department of Ecology and the proponents justify the "objective" comparison of these two alternatives when the REIS provides a project-level engineering analysis for the dam but fails to provide an equivalent, quantified cost-benefit analysis for the LAND alternative—specifically regarding the long-term maintenance costs of a dam under 2080 climate projections versus the permanent risk reduction of the LAND strategy?*

The REIS is woefully inadequate in its analysis of the long-term economic damage to the Grays Harbor Estuary and its multi-million-dollar shellfish, fishing and crabbing industries.

The proposed project threatens the economic stability of our members in the following ways:

31. Disruption of Nutrient Cycling: The Grays Harbor Estuary depends on a delicate balance of organic carbon and nutrients delivered by the natural, unimpeded flow of the Chehalis River. The REIS fails to model how will the "temporary" retention of floodwaters—which often carry the highest concentrations of nutrients and woody debris—will starve the estuary's primary productivity, leading to a "starvation effect" up the food chain to Dungeness crab and oysters?

32. Shellfish beds rely on specific sediment dynamics. By trapping silts and gravels behind the dam structure, the project will alter the "scour and fill" cycle of the lower river. This increases the risk of sandy sediment deposition over productive oyster plots in the South Bay, potentially smothering crops and destroying years of investment. *What would be the financial impact to the growers, and what would be the potential production loss because of the altered habitat?*

33. Grays Harbor is a critical nursery for Dungeness crab. The REIS acknowledges that water temperatures could rise by up to 9.0°F in some areas. Elevated temperatures and altered flow timing can jeopardize the survival of crab larvae and juvenile "young-of-the-year" (YOY) crabs that utilize the lower estuary. *What would be the potential economic loss?*

34. We must learn from the Columbia River, where commercial salmon landings have plummeted to a fraction of their pre-dam levels. The REIS confirms that Spring Chinook—a vital component of the regional "Salmon Economy"—face extinction because of this project. The loss of these runs does not just affect the river; it reduces the biomass available for the entire coastal ecosystem, including the $65 million whale-watching industry and the tribal and commercial trollers of the Westport fleet. *What is the cost of endangered listing?*

35. Based on these impacts, we ask: *Why does the REIS fail to include a formal Economic Impact Study for the lower WRIAs (22 & 23) that quantifies the potential loss in revenue for the fishers, tribal, recreational, commercial Dungeness crab and Pacific oyster industries?*

36. *How can the Department of Ecology approve a project that puts the state's most lucrative coastal fisheries at risk for the sake of localized, temporary and unproven flood storage?*

The 2025/2026 REIS acknowledges "significant and unavoidable" impacts but fails to prove that proposed mitigations are affordable, feasible or that the dam will remain effective under current climate projections. FOGH requests that the Department of Ecology acknowledge these inadequacies and prioritize the LAND alternative to ensure the survival of our basin's ecology and economy.

Thank you in advance for your consideration and responses to these concerns.

Arthur (R.D.) Grunbaum