

**American Rivers • Citizens for a Clean Harbor • Trout Unlimited
Washington Wild • Wild Steelhead Coalition**

November 14, 2016

Gordon White
Program Manager, Shorelines and Environmental Assistance
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Comments on Chehalis Basin Strategy Draft Programmatic Environmental Impact Statement

Dear Mr. White,

Please accept these joint comments for the record on the Chehalis Basin Strategy Draft Programmatic Environmental Impact Statement (PEIS) on behalf of the organizations listed below. Some of the organizations are also submitting additional detailed, technical comments. The comments below are, in keeping with the programmatic nature of the PEIS, an overview of our response to the PEIS.

- American Rivers – AR’s mission is to protect wild rivers, restore damaged rivers, and conserve clean water for people and nature. American Rivers’ Northwest Office seeks to preserve the region’s most valuable rivers, to protect remaining wild, free-flowing waterways, to conserve fish and wildlife, and to improve and enhance recreation opportunities.
- Citizens for a Clean Harbor - We are against the crude oil terminal planned for Grays Harbor. The issue for us is imminent danger of oil spills, the impact it will have on our economy, and the mile long trains blocking access in the communities along the route. Our goal is to find alternatives to fossil fuel energy.
- Trout Unlimited - TU’s mission is to conserve, protect, and restore North America’s coldwater fisheries and their watersheds. TU’s organizational goal is that by the next generation, we will ensure that robust populations of native and wild coldwater fish once again thrive within their North American range.
- Washington Wild - Washington Wild's mission is protect and restore wild lands and waters in Washington State through advocacy, education and civic engagement. As a nonprofit 501(c)3 organization since 1979, the organization has worked to build diverse coalitions throughout Washington State focusing on protecting, defending and restoring wild lands and waters and recreational access to these incredible areas for the enjoyment of current and future generations.
- Wild Steelhead Coalition - The Wild Steelhead Coalition is dedicated to restoring healthy returns of wild steelhead to the waters of the West Coast.

1. General Comments on the Programmatic EIS

Recognizing that the PEIS is in fact intended to be programmatic, the level of detail and specificity of various actions within the PEIS is quite varied. Further, within a specific action, some attributes are well developed, while other, equally important ones are not. This variation in analysis creates a situation in which adequately understanding the actions, their function and their environmental attributes is difficult, and understanding the interaction between the elements nearly impossible.

For example; detailed engineering and design has been done for the proposed dams, but little has been done to explore how those dams might affect sediment transport that is critical to the Aquatic Species Habitat Actions. Similarly, the dams are intended to affect downstream flood risk, but those effects are not integrated into the Local-scale Flood Damage Reduction Actions (LFDRA).

Fundamentally, the PEIS is flawed because of this. As discussed below, additional work is needed to make some of the Actions and interplay among Actions well enough understood to make charting a programmatic direction useful. Until that work is done, the PEIS will not have served its purpose in guiding decision makers.

A puzzling omission in the PEIS is that no entities are named which will be technically or financially responsible for performing many of the actions. There is no description of the institutional arrangements needed to construct, operate and maintain the large scale flood damage reduction actions. The future performance of the proposed Actions cannot be evaluated without some guidance as to the capabilities of those responsible for execution. What will the cost sharing arrangements be among the local, state and federal governments? Will direct beneficiaries of actions, such as people whose water rights are more secure or whose land becomes more valuable, be responsible for any of the cost?

Large complex projects such as this cannot be accomplished all at once as they are dependent on funding, scheduling of needed additional studies, and public review under NEPA and/or SEPA for each individual project. Therefore, the PEIS should lay out a proposed staging and sequencing of the actions and elements within actions.

2. No Action is not an acceptable alternative for the aquatic species, people of the Chehalis Basin, or the State of Washington

No Action is not an acceptable alternative for the fish and wildlife of the Chehalis basin, which are declining under current conditions and will decline faster as the climate changes. No Action is also not acceptable for the people of the Chehalis basin or for the nation, given how important Interstate-5 is to the economy of the State of Washington.

However, given how long the flood reduction actions will take to implement, especially either of the proposed dams which will be mired in controversy and litigation for years, early implementation of the Aquatic Species Habitat Actions and Local-scale Flood Damage Reduction Actions is needed now and should continue regardless of the status of the flood projects.

3. Aquatic Species Habitat Actions

We strongly support the concept of the Aquatic Species Habitat Actions (ASHA). This type of comprehensive approach to fishery and aquatic species restoration is needed throughout the state; however, the details remain to be described in the Chehalis Aquatic Species Restoration Plan still being drafted by Washington Department of Fish and Wildlife.

Of significant concern is the actual delivery and permanence of the results outlined in the PEIS. Much of the fishery restoration promised is an anticipated outcome from improved conditions arising from changed forestry practice - whether that increase in fisheries will actually result from those improved practices is uncertain. Any fishery restoration benefits that do arise will essentially be mitigation for prior poor forest practice. The ASHA depends on voluntary participation by riparian landowners willing to have restoration actions taken on their land. While some of that land will need to be purchased from willing landowners and secure permanent habitat restoration, the ASHA also relies extensively on leased land. This is a cause for concern since significant investment would be put toward aquatic species restoration projects and a relatively short-term 10 year lease would not protect the investment over the long term.

4. The Flood Retention and Flow-Augmentation and Flood Retention Only Dam Alternatives

The technical and engineering attributes of the Flood Retention and Flow-Augmentation (FRFA) and Flood Retention Only (FRO) dam proposals appear to be very thoroughly developed for a Programmatic EIS compared to the other alternatives; however, the ecological impact and economics are much less developed and need to be quantified. Among the concerns common to both dam alternatives are: 1) the costs of the dams appear to be understated – typically building dams run well over initial budgets; 2) sediment transport analysis is weak and needs additional study; 3) effects on water quality beyond temperature and dissolved oxygen needs further analysis; 4) impacts on wildlife beyond salmon needs much more consideration and investigation; and 5) the impacts of further disconnecting natural geomorphic processes and the ecosystem services they provide (including water filtration, nutrient cycling, and flood reduction) needs to be considered in the benefit/cost analysis. In addition, building a dam would almost certainly promote development of the floodplains downstream – just as it has on the Green and Puyallup Rivers. The dams would also eliminate recreational river boating opportunities in the impounded areas. Discussion of the growth inducing impacts of these dam proposals is absent in the PEIS.

The FRFA proposal should be rejected for many reasons. Conversion of the Chehalis River to a permanent reservoir impoundment will remove hundreds of acres of forest and wetland, impair water quality, reduce fish-passage, reduce aquatic habitat quality, reduce salmonid survival across the basin, impair migration corridors for terrestrial species, inhibit sediment and debris transport, and induce negative geomorphic changes up and downstream. Of paramount concern, is the ineffective passage of lamprey, an ecologically important anadromous species that holds cultural and spiritual importance to Native Americans. The FRFA would also completely block large woody debris recruitment and nutrient-rich sediment, both of which are needed for healthy riverine processes downstream and for successful implementation of the ASHA. In term of impacts to water resources and water usage, the PEIS should include a thorough analysis of the water rights in the basin and the effect of the FRFA reservoir operation on those rights. Water in the Chehalis basin is over-appropriated; serious consideration is needed in order to protect river flows ostensibly dedicated to fish from appropriation through wells and surface diversion.

A successful example of an FRO-type dam of this scale does not exist – it is an unproven technology. The risks of dam failure should be clearly laid out in the PEIS. Dam safety must be paramount. The FRO has many of the same flaws as the FRFA – but with a lower degree of certainty of impact. Will the structure allow for effective passage of all life stages of anadromous and resident fish? Will sediment be deposited at the upstream end of the pool and not be mobilized, leading to accumulation of a large sediment wedge above the dam? How will water quality be affected, particularly temperature as a result of several miles of cleared reservoir footprint?

Both of these dams would require significant operations and maintenance funding.

5. The Restorative Flood Alternative

Unlike the dam elements, the Restorative Flood Alternative (RFA) is in very early stage of development. It has clear advantages in that it provides reduction in flood stages arising on the Newaukum and South Fork of the Chehalis River, which are not regulated by the dam proposals. It is a truly integrated approach, combining flood damage mitigation with aquatic species restoration in one action. This is the direction of the most innovative approaches to flood management now being developed. However, both its engineering and costs are in very early stages of development. Additional engineering and development is needed to define where RFA actions can be most beneficial and cost effective.

Without this additional development work, the cost estimates presented are very unreliable – until we know what can actually be accomplished the cost is a wild guess. Further, the cost of a large scale land acquisition program should be estimated by professionals in that field, not engineers and scientists expert in river restoration.

6. Local-scale Flood Damage Reduction Actions

The weakest part of the entire PEIS is in the Local-scale Flood Damage Reduction Actions (LFDRA). The PEIS includes a number of LFDRA elements, but the document makes no prescriptions and presents no mechanism of implementation. LFDRA Actions can be implemented immediately and probably at lowest cost, however no economic analysis was done on most of its elements, The PEIS should present and evaluate a proposal for implementing actions such as elevating of structures, buy-outs, flood-proofing, farm pads, alarm systems, floodplain land use management, and the other elements it mentions.

7. Forests and Hydrology

Management of the floodplain is not the only land use issue at hand – management of the forested uplands are relevant to the Chehalis basin's hydrology. Industrial forestry of the uplands has affected the fishery resources in the basin and may have affected flooding and summer low flows. Yet the PEIS addresses forest land management only cursorily. Detailed modeling should be performed to establish the relationship between forest practice and both flooding and summer low flows.

In conclusion, we strongly support the concept behind the Aquatic Species Habitat Actions, but note that the details have not yet been released. We oppose construction of the dam alternatives based on the information presented in the PEIS. The RFA is promising, but needs additional technical and feasibility analysis. Local-scale Flood Damage Reduction Actions need to be much more completely developed as a real alternative and not simply a list of possible elements, and then analyzed. The

relationship between forest practices in the uplands and the hydrology of the Chehalis River system needs to be characterized and understood as part of this process.

Thank you for your attention to these comments.

Sincerely,

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American Rivers

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