

October 29<sup>th</sup>, 2018

Gordon White, Program Manager, Department of Ecology  
Ryan A. Baum, Major, Corps of Engineers, Acting Commander  
Chehalis Basin Strategy EIS, c/o Anchor QEA  
720 Olive Way, Suite 1900  
Seattle, Washington 98101

Submitted Electronically: <http://chehalisbasinstrategy.com/comment-form>

RE: Scoping Comments on Chehalis River Basin Flood Damage Reduction  
Project Environmental Impact Statement

Dear Mr. White and Major Baum:

American Whitewater provides these comments to inform the Scope of the Chehalis River Basin Flood Damage Reduction Project Environmental Impact Statement (EIS). American Whitewater is strongly opposed to construction of a new dam on the Chehalis River (characterized in the public notice as a "Flood Retention Expandable facility"<sup>1</sup>).

We encourage the Governor's Chehalis Basin Workgroup to terminate planning for a new dam on the Chehalis River. Instead we encourage the State to invest resources in fully developing the Restorative Flood Protection alternative, begin project-level environmental analysis and investment in structural flood protection that does not include construction of a dam, and expand the scope and investment in Local-Scale Flood Reduction and Aquatic Species Habitat Actions.

We request that we be included on the EIS notification list for both US Army Corps of Engineers and Washington Department of Ecology.

### **I. Interest of American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. We have approximately 6000 individual members and over 100 local-based affiliate clubs, representing thousands of whitewater paddlers across the nation. In Washington State, we represent an enthusiast paddling population of approximately 3,000 paddlers through our individual members and local affiliate clubs. As an organization that represents recreational river runners on issues related to both conservation and public access to waterways, American Whitewater has an interest in the Chehalis River. The reaches below the

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<sup>1</sup> 83 FR 49076

proposed dam site were mapped and documented for recreational use by Wolf Bauer on the Washington Kayak Club's Kayaking River Map during the 1950s and 1960s.<sup>2</sup> The reach upstream of the proposed dam site was first described in detail in *A Guide to the Whitewater Rivers of Washington*.<sup>3</sup> The river reach that would be directly impacted by the dam is included in American Whitewater's National Whitewater Inventory.<sup>4</sup> A significant percentage of our members reside in Washington State—a short driving distance from this river for recreation.

## **II. Alternatives for Consideration**

American Whitewater is strongly opposed to any new dam on the Chehalis River. The Proposed Action is for a new flood retention facility—a dam—within the upper Chehalis River and the raising of levees at the Centralia-Chehalis Airport. The EIS must clearly define the Purpose and Need. While the public notice states that “the EIS will address an array of alternatives for providing alternatives suitable for reducing flood damage within the Chehalis River Basin, including a no action alternative,”<sup>5</sup> a clearly defined Purpose and Need is essential to evaluate the effectiveness of and extent of flood risk reduction the proposed action will provide. Alternatives considered should provide for a comprehensive response that integrates reducing flood damage and restoring aquatic species habitat within the Chehalis Basin. The EIS should consider the location of the dam and include a geospatial analysis of its overall effectiveness in reducing flood damage. While the dam would provide flood reduction services for rain events in the Upper Chehalis watershed, our understanding is it would not provide any flood control benefit for localized rain events in major tributaries including the South Fork Chehalis, Newaukum, or Skookumchuck watersheds.

The public notice states that the dam would be constructed in a manner that would make it “capable of supporting future construction of a larger dam with up to 130,000 acre feet of storage,” but would defer any analysis on this alternative to a “separate NEPA and SEPA process.”<sup>6</sup> Given that the public notice explicitly states that a “flood retention expandable facility” is being proposed, this is what needs to be analyzed. It is inappropriate to conduct environmental review that does not consider the future expansion of the facility as a storage reservoir.

The public notice includes two separate but related actions: construction of the dam and raising levees at the Centralia-Chehalis Airport. The EIS must include separate alternatives for each to facilitate independent review of the impacts of each action.

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<sup>2</sup> <https://www.americanwhitewater.org/content/Document/view/documentid/578/>

<sup>3</sup> Bennett, J. 1991. *A Guide to the Whitewater Rivers of Washington*. Swiftwater Publishing Company.

<sup>4</sup> <https://www.americanwhitewater.org/content/River/detail/id/2081/>

<sup>5</sup> 83 FR 49076

<sup>6</sup> 83 FR 49076

Given the commitment to evaluate an “array of alternatives,” we request that the EIS fully consider action alternatives that provide flood control benefits that do not require construction of a dam.

### **III. Impacts of a Dam: Issues to Evaluate**

#### *Biological and Ecological Impacts of a Chehalis River Dam*

The Chehalis River is currently characterized by extensive floodplains with diverse in-channel and off-channel habitat. This habitat complexity supports amphibian diversity and relatively healthy and robust salmon runs, but the future of these runs is in jeopardy. A notable characteristic of the river is the absence of Endangered Species Act (ESA)-listed salmon or steelhead. Despite this, habitat, harvest, and hatchery impacts are negatively affecting salmonid populations there, and a need exists to reverse this trend. A new dam would not address the degradation of salmon and steelhead habitat in the basin; it would only compound the challenges fishery resources face. The cumulative effects analysis with the EIS, must consider the impact of a dam on an already stressed river system.

Direct impacts of a dam and effects of an inundation zone—even for temporary periods of time—on mainstem spawning habitat must be evaluated. The EIS must account for impacts from proposed clearcutting within the reservoir footprint and complete removal of riparian vegetation. Impacts, including those from associated road-building, will include increased sediment delivery, reduced shading, increased summer water temperatures, altered hydrology and sediment transport, impacts to spawning habitat, and extensive loss of riparian habitat. Clearcutting tributary junctions will negatively impact biological hotspots and will have a disproportionate impact on biodiversity that must be accounted for. The following impacts need to be analyzed and quantified in the EIS:

- inundation of spawning habitat and salmon redds when the reservoir is filled,
- salmon and steelhead redd scouring immediately downstream of the dam,
- fragmentation of habitat with reduced floodplain connectivity and complexity,
- loss of riparian forest and associated ecosystem services,<sup>7</sup>
- precluded opportunities to restore health of the riparian forest,
- new fish passage challenges, and
- severe disruption of sediment transport essential to maintenance of fish habitat.

In addition to the individual impacts, the cumulative impacts of a new dam must be considered given threats salmon and steelhead are already facing in the

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<sup>7</sup> Naiman, R. J., Decamps, H. and Pollock, M. (1993), The Role of Riparian Corridors in Maintaining Regional Biodiversity. *Ecological Applications*, 3: 209–212.

watershed. The impacts of a proposed dam on salmon and steelhead must also consider the cascading impacts on other species. Salmon, and particularly Chinook salmon, represent a critical food source for Endangered Southern Resident Killer Whales (SRKW) and the Governor has called for immediate actions to address the issue of inadequate prey (i.e. salmon that represent a primary food source for SRKW). Many have called for the removal of dams to rebuild salmon runs for the benefit of SRKW, and a new dam contemplated for the Chehalis should consider the impact on their primary prey source.

### *Operational Considerations of a Chehalis River Dam*

The long-term sustainability of a dam needs to be analyzed given the significant operations and maintenance costs. A plan for agency oversight and management—addressing the fundamental question of who would own and operate the facility—needs to be presented and evaluated in the EIS.

### *Recreational Impacts of a Chehalis River Dam*

A new dam on the Chehalis River would permanently foreclose use of this reach of the Chehalis River for whitewater kayaking and rafting. While current access policies implemented by Weyerhaeuser restrict access, our vision for the future is a river that is open and accessible and not lost permanently under the slackwater of a reservoir. We encourage the state to work with private forest land owners to enhance recreational opportunities on rivers that flow through commercial timberlands. Outdoor recreation is important to our quality of life in the Pacific Northwest. We should be seeking ways to improve opportunities to enjoy outdoor recreation and access to our waterways and not further limit them.

In the process of developing an EIS and as part of field work, American Whitewater requests a site visit focused on recreation. The regional paddling community has enjoyed this reach for many years and it is known as an extremely high quality resource. In recent years, access has been challenging due to Weyerhaeuser's current management practices. The reach has been popular for both whitewater kayaking and rafting in the past but has been less accessible in recent years due to current access policies of the private forest land manager that favor hunting over other dispersed recreation uses. We believe it is necessary to investigate the impacts to whitewater recreation in a manner that includes field work. Methodology is available from the National Park Service Rivers and Trails Conservation Assistance program.<sup>8</sup>

Should the dam move forward, impacts to recreational opportunities and aesthetics need to be addressed and mitigated. Permanent loss of a river for whitewater recreation in the Chehalis Basin is a significant impact regardless of

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<sup>8</sup> Whittaker, D. B. Shelby, and J. Gangemi, 2005. Flows and Recreation: A Guide to Studies for River Professionals. Hydropower Reform Coalition and National Park Service – Hydropower Recreation Assistance. Available at: <https://www.nps.gov/ncrc/programs/hydro/flowrec.htm>

current access policies. Clearing of riparian vegetation within in the inundation zone will have significant impacts on aesthetics. Appropriate mitigation measures must be addressed in the EIS with discussion of avoidance, minimizing, and mitigating impacts to both recreation and aesthetics.

#### **IV. Conclusion**

Thank you for the opportunity to provide scoping comment in advance of the preparation of a Chehalis River Basin Flood Damage Reduction Project Environmental Impact Statement. We are strongly opposed to a new Flood Retention Expandable facility—a dam—in the Chehalis River basin.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a stylized flourish at the end.

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director