



May 27, 2020

Chehalis Basin Board
c/o Andrea McNamara Doyle
Office of the Chehalis Basin Director
PO Box 47600
Olympia, WA 98504-7600

Cc:
Mr. Gordon White
SEPA Responsible Official
Washington State Department of Ecology

Laura Watson
Washington State Department of Ecology
Director

Jay Inslee
Washington State Governor

Members of the Chehalis Basin Board and other parties committed to a resilient Chehalis River Basin,

We are writing to ask that you stop work on the Draft Environmental Impact Statement (DEIS) for the Chehalis Flood Hazard Reduction Project and redirect resources towards developing a comprehensive watershed scale Flood Resilience Program. This pathway offers the only viable means to deliver a sustainable program that meets the dual objectives of the Chehalis Basin Strategy (Strategy) to reduce flood damage and restore aquatic species' habitat, while providing tangible benefits to Basin communities.

The Local Action Alternative (LAA) presented for comparison against the proposed Flood Retention Expandable facility (FRE) is wholly inadequate. The DEIS fails to present sufficiently detailed elements of the LAA, and it does not offer any significant analysis to provide for a valid comparison of

The Chehalis River Alliance is a coalition of concerned citizens working to ensure a bright future for the Chehalis River Basin's invaluable natural resources and the people who call this region home

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the alternative's potential to meet the objectives of the DEIS. We agree with the DEIS conclusion that the proposed FRE would cause significant negative impacts and argue that adequate mitigation would be unfeasible. It is also clear that the FRE would not deliver secure and significant flood damage reduction for Basin residents. Therefore, it is not a viable pathway for achieving the objectives of the Strategy. Rather, it is a 19th century solution for a 21st century problem.

The Chehalis River, like all rivers, has historically undergone natural periodic flooding, and the flooding challenges residents of the Basin face are not new. Over one hundred years of settlement and development in the floodplain have put residents and their communities increasingly at risk. "Flood control" is not an achievable or realistic goal, and further investment in this illusion is a waste of taxpayers' money. Washington State needs to make a wise investment now in developing a resilient future for the Chehalis Basin. It is time for the Office of the Chehalis Basin (OCB) to put its energy and resources towards development of a comprehensive, sustainable program of local actions and watershed restoration that actually minimizes flood damage for all Basin residents while restoring the Basin's aquatic species, habitats, and ecological processes.

We propose development of a comprehensive watershed-wide Flood Resilience Program that combines restoration of the ecological functions of the watershed with rebuilding of our communities to allow them to coexist with floods. Development of a Flood Resilience Program needs to be the new centerpiece of the long-term Strategy and should be the primary focus of investment by the State from this point forward.

We also recommend a competitive solicitation to acquire a new neutral contractor for development of the program. This consultant should build upon the work done to date, in collaboration with a team of individuals from the Confederated Tribes of the Chehalis and the Quinault Indian Nation, the OCB, a subcommittee of the Chehalis Basin Board (CBB) and other qualified individuals.

Program development would require additional analysis such as the development of more accurate hydrologic and hydraulic models for the entire Basin and the delineation of channel migration zones and erosion hazards. Once a comprehensive assessment of risks is completed, work to develop a suite of actions to address those risks and a strategic plan for prioritizing and implementing the identified actions should begin.

The Local Actions Alternative Technical Analyses Review completed for and submitted by the Quinault Indian Nation clearly lays out the framework for development of a viable Flood Resilience Program. We recommend the OCB work with the newly hired contractor to utilize this framework in conjunction with the fledgling and underfunded Community Flood Assistance and Resiliency Program (CFAR) to develop the Flood Resilience Program.

It is time for the OCB to follow the leadership of the Tribes in the Basin. The Confederated Tribes of the Chehalis have been implementing local actions on the Chehalis Reservation proven to reduce flood damage since the devastating flood of 2007. The Quinault Indian Nation has put tremendous efforts into exploration of mechanisms to increase floodplain water storage. Now is the time to work collaboratively to develop a Flood Resilience Program that will set success into motion for the entire Basin.

This is a turning point for Washington State. Rivers have proven time and again that they can never be fully tamed. The experience of the last century shows that attempting to engineer big solutions to address the difficulties we face from the natural world simply creates new environmental problems that trigger a never-ending cycle of engineering fixes with dire social and environmental consequences. We have an opportunity to lead other communities across the nation who are grappling with increasing flood impacts resulting from ill-planned floodplain development and a changing climate. The paradigm of the future is to rethink flood damage reduction through collaborative development of a viable sustainable Flood Resilience Program. We hope that we can help you along this new pathway – for the Chehalis River Basin, its communities, ecosystems, and all citizens of Washington State.

Sincerely,

A selection of organizations supporting the Chehalis River Alliance

Jessica L. Helsley
Washington Director
Wild Salmon Center



Brian Stewart
Cascades to Olympics Program
Coordinator
Conservation Northwest



Thomas O'Keefe, PhD
Pacific Northwest Stewardship
Director
American Whitewater



Rich Simms
Co-Founder
Wild Steelhead Coalition



Arthur (R.D.) Grunbaum
President
Friends of Grays Harbor (FOGH)



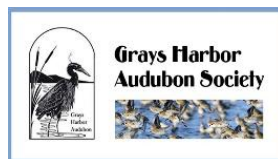
Lee First
Waterkeeper
Twin Harbors Waterkeepers



Tammy Domike
Citizens for a Clean Harbor



Janet Strong
President
Grays Harbor Audubon Society



Jamie Glasgow
Director of Science
Wild Fish Conservancy



Greg Haller
Executive Director
Pacific Rivers



Cindy Hansen
Orca Network



Shari Tarantino
President
Orca Conservancy

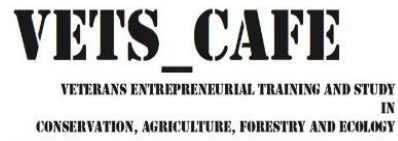


Laurie Kerr
Cascade Volcanoes
Broadband Leader
Great Old Broads for
Wilderness



Paul Pickett
Retired Department of
Ecology

Vets Café
Centralia, Washington



Shelley Spalding

Deston Denniston
Executive Director
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