



Chehalis River Alliance statement on Flooding the LAND Steering Committee.

The Chehalis River Alliance (Alliance) represents a diverse group of community members. Some of us are still cleaning up flood water, helping our neighbors, watching mud-slick treeless hills with a sense of dread, and assessing damage and future hazards. We empathize with the grief and trauma these events have on us, on the land, and our neighbors. The Alliance's members would like to offer our thoughts and prayers to those impacted by the latest flood in the basin, and offer thanks to all of those responders and officials that worked so hard to keep us safe.

As we look to the future, our vision includes working with our entire community to increase resiliency and move people out of harm's way. It will be a long road, but we are confident that with this hard work, we will no longer spend so much time and effort recovering from future floods.

A basin-wide solution that works for everyone will be a tall order, and will entail much study and compromise. The newly formed Local Actions Non-Dam Alternative (LAND) steering committee is charged with developing a solution that does not include a dam. We whole-heartedly support this step, and we realize that each member is a good faith representative who wants the best for the region.

This process won't be easy - it is rushed, underfunded, and a few years behind the rest of the work. We hope these constraints will change. We want to see the best possible outcome and think there are four actions that will facilitate a better LAND process and ensure sound solutions that safeguard all:

1. Time: LAND will not have the appropriate time to develop a foundation and understanding of the challenges and solutions. It would require at least another year or so, the original option has had decades of analysis. We feel that giving the LAND 1/5 of the time that the original project proposal has been given would at least give the temporal space necessary to develop something comparable.
2. Funding: Because the alternatives were never really fleshed out or even offered in the initial reviews and proposals, the funding for this process was essentially used to develop a second project, not an alternative. We think that this should be rectified, because the original efforts focus on two versions of the same project or nothing. We feel this process should be given equal funding. Although this may not be feasible, we would like to encourage budget funding and allocation processes to consider at a minimum, doubling the current funding allocation.

3. Data: The charge of the LAND is to use already collected data to make their assessment. This can be problematic, if the original alternative was just a second version of the proposed project, then all data will be skewed to questions that support that hypothesis. In short, the LAND needs to ask different questions if they have a different hypothesis. For example, if one says "I think X so I will test Y for its relationship to X ", this is great, but when one changes the question to "I think Z has a relationship to X " one would not then test for X's relationship to Y. In summary, assumptions, hypothesized solutions, criteria and parameters have limited past studies to the proposed project, not to a true local-actions alternative. Therefore, it can be deduced that there may be tons of questions, data, and metrics, criteria that need to be evaluated and re-supported with evidence. We feel an increase in time and budget can facilitate an acceptable solution.
4. EIS Reconciliation: As mentioned by the LAND steering committee and the Alliance, the SEPA/NEPA dichotomy is a barrier to finding sustainable solutions in the basin. We encourage the Office of Chehalis Board to either reconcile the two documents or have a qualitative review drafted that can remove or identify assumptions and data gaps and produce a set of facts that are the same. We feel it will be very difficult to come to an agreement when the information is divergent.

The Alliance is hopeful that this process develops a holistic and sustainable LAND recommendation. Overall, if the LAND is to be successful it should be given every opportunity to achieve its fullest potential. Making sure the steering committee and the Basin have enough time to provide quality recommendations should be a key component of this process. Guaranteeing the right amount of funding allocation to see the process through is paramount to having a comprehensive plan. Asking different questions and seeking new information should be a function of the LAND. Lastly, the reconciliation of the divergent EIS documents is needed so decision makers and community members can all be using the same set of facts to inform their opinions and decisions.

The Alliance thanks you for your time and we look forward to the realization of a LAND alternative that is robust and meaningful.

Sincerely,

The Chehalis River Alliance

<https://www.chehalisriveralliance.org/>