Wild Fish Conservancy
NORTHWEST
SCIENCE EDUCATION ADVOCACY

Bobbak Talebi, Director
Department of Ecology
Southwest Region Office
P.O. Box 47775
Olympia, WA 98504-47775

RE: Comments on the Proposed Chehalis River Basin Flood Damage Reduction Project Revised Draft Environmental Impact Statement

Submitted via
Public Comment Form
February 4, 2026

To Director Talebi and the Review Team:

Wild Fish Conservancy appreciates this opportunity to provide comments on the Revised Draft Environmental Impact Statement (EIS) for the Chehalis River Basin Flood Damage Reduction Project. As a science-based conservation organization dedicated to protecting wild fish ecosystems throughout the Pacific Northwest, we continue to see substantial and insurmountable environmental impacts associated with this proposed project that far outweigh its limited—in both scope and time—flood-protection benefits. Watersheds are incredibly complex, with the timing, frequency, magnitude, and duration of streamflows acting as the engine that drives the system. The natural processes of wood, water, and sediment transport that form the physical template for life in the watershed are interconnected in many ways that are known, and inevitably some that are not. It is safe to say, though, that we cannot expect to significantly alter the highest flows that the watershed experiences without causing significant unintended and unanticipated impacts to the health of the system.

The revised draft EIS found that:

> *"constructing and operating the flow-through dam and temporary reservoir would significantly and negatively impact fish and wildlife as well as aquatic and land habitats, recreation, earth, water, transportation, wetlands, land use, Tribal resources, cultural resources, environmental health and safety, environmental justice, and public services and utilities".*

This is in addition to and despite the many impacts that have not yet been adequately addressed in the draft EIS. The reviewing agencies have a responsibility to consider all these impacts collectively—not independently of each other—but instead by accounting for interactions between impacts. In many ways, the cumulative effects of these impacts are much greater than the sum of their parts. It is critical that the draft EIS address the feedback mechanisms between geologic, hydrologic, climatic, biologic, ecologic, and geomorphologic characteristics in the upper Chehalis basin that ultimately determine the environmental impacts of the flood hazard reduction facilities under review.

The draft EIS comments submitted by Paul Bakke (January 5, 2026), an experienced and well-respected fluvial geomorphologist, make these points thoroughly and admirably, and we endorse the concerns he raises regarding the methodological flaws in the sediment transport analysis. Specifically, the draft EIS relies on the Ackers and White (1973) formula, an obsolete model developed using flume studies with uniform sediment. This model is scientifically inappropriate for the Chehalis River, which has a mixed-grain streambed with a coarsened surface layer, and consequently, the draft EIS fails to accurately predict bedload mobility or the gravel-to-sand transition point. Furthermore, the draft EIS fails to include an effective discharge analysis; without calculating the specific range of discharges that move the most sediment over the long term, the draft EIS cannot accurately predict how the dam's altered flow regime will change the channel shape and streambed composition.

We must also highlight critical omissions regarding construction feasibility that render the project effectively unbuildable under current law. The draft EIS fails to analyze the massive scale of water withdrawal required for construction—estimated at 2,000,000 gallons per day—or identify a legal source for this water given that the Chehalis River is heavily regulated and often fails to meet minimum instream flows. Withdrawing this volume during low-flow periods would dewater the river, degrading aquatic habitat and violating instream flow rules. Furthermore, the draft EIS characterizes foundation dewatering as "brief," which is factually incorrect; excavating a

160-foot-deep foundation into the aquifer below the riverbed will require continuous, high-volume pumping for over a year. The draft EIS fails to analyze the "cone of depression" this will create, which will likely dewater the adjacent river channel and hyporheic zone, severing fish passage and drying up wetlands that are critical to species such as Lamprey that rely extensively on this subsurface flow. Operational safety is similarly misrepresented. The draft EIS relies on flawed geotechnical analysis to claim the reservoir is safe, assuming a reservoir drawdown rate of 10 feet per day. This rate is dangerously fast and contradicts the project's own geotechnical reports, which noted that rates faster than 2 feet per day would destabilize slopes. A 10-foot-per-day drawdown will leave saturated banks without support, triggering widespread landslides that will dump massive volumes of sediment into the river, suffocating salmon eggs downstream—an impact the draft EIS fails to quantify.

We will add, however, that Washington has a regrettable history of increasing hatchery production in an effort to "mitigate" for environmental impacts like those that would be caused by the proposed dam. It is in this way that many of the state's environmental travesties, including the construction of the recently removed Elwha River dams, were rationalized. The hatchery programs currently underway in the Chehalis lack adequate monitoring data, fall short of meeting the independent Hatchery Scientific Review Group recommendations to limit hatchery impacts on wild fish populations, and are assumed to negatively impact wild fish populations there. We urge the Chehalis Basin Board and other decisionmakers to not ignore the best available science, including Anderson et al. (2020) (*Hatchery Reform Science in Washington State*, WDFW) [1], which demonstrates the unintended negative impacts hatchery programs have on wild fish populations. Furthermore, a global synthesis by McMillan et al. (2023) (*A Global Synthesis of Hatchery Effects on Wild Salmonids*) [2] confirms that hatchery fish often have negative effects on wild salmonids through genetic and ecological interactions. Proposals like this to offset dam impacts on wild salmon and steelhead by increasing hatchery production in the Chehalis would further compromise wild fish populations.

Additionally, the draft EIS confirms that the project will result in the permanent loss of Spring Chinook salmon from the upper basin, a violation of the State's obligations under the Public

---

[1] Anderson et al. (2020). Hatchery Reform Science in Washington State. WDFW. Available online at: **https://wdfw.wa.gov/sites/default/files/publications/02121/wdfw02121_0.pdf**

[2] McMillan, J.R., Morrison, B., Chambers, N., Ruggerone, G., Bernatchez, L., Stanford, J. et al. (2023) A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids. *Fisheries Management and Ecology*, 30, 446–463. Available from: **https://doi.org/10.1111/fme.12643**

Trust Doctrine. The document explicitly acknowledges that dam operations will eliminate Spring Chinook and nearly eliminate coho salmon in the Above Crim Creek Subbasin by mid-century. The State holds these fish resources in trust for the public, and permitting a project that knowingly results in the localized extinction of a native stock constitutes an abdication of that duty. Because the loss of this unique genetic stock is irreversible and unmitigable, the project fails to protect the ecological endowment for future generations as required by law.

The Chehalis River is described by the U.S. Fish and Wildlife Service as the most intact lowland river system left in western Washington. Constructing a dam here to reduce flood damage and, ultimately, advance economic development of the floodplain at the expense of the ecological integrity of the watershed is short-sighted and foolhardy. This is especially true as we face unprecedented climate uncertainty, a volatile political environment, and funding unreliability. The draft EIS describes a project that is fundamentally legally infeasible due to insurmountable water rights constraints, inherently unsafe due to unmitigated landslide risks, and ecologically ruinous. History will judge the results of this State Environmental Policy Act (SEPA) process and the decisions that come out of it. It's time for the state to cut its losses on this ill-conceived dam project. The environmental risks posed by this proposal far outweigh the benefits, especially when compared to more sustainable nature-based alternatives that can achieve the project goals.

We urge the Department of Ecology to deny the proposal under WAC 197-11-660(1)(f) due to its significant, unmitigable adverse environmental impacts.

Sincerely,

Emma Helverson
Executive Director
emma@wildfishconservancy.org

Jamie Glasgow
Director of Science
jamie@wildfishconservancy.org