



May 13, 2021

Chehalis Basin Board
c/o Andrea McNamara Doyle
Office of Chehalis Basin Director

Chehalis Basin Board Members,

The coalition of stakeholders comprising the Chehalis River Alliance strongly oppose the 2021-2023 Biennium Budget and Work Plan as proposed at the May 6, 2021 board meeting.

First and foremost, as part of the environmental review process, numerous comments were submitted from a myriad of commentators calling for the development of a comprehensive, basin-wide local action flood damage reduction program (LAP). In response, the Office of the Chehalis Basin (OCB) developed technical and implementation advisory teams, that worked diligently over the past six months to formulate the structure of such a program. The failure to incorporate the development of a LAP in the scope of work and budget for the next biennium is an egregious error, and an affront to the work that numerous individuals put in to create a path forward for a basin-wide coordinated approach. Participants worked under the assumption that their recommendations would be used as a foundation for further analysis and the development of a unified plan. With \$0 proposed in the budget for development of the LAP, it appears that the OCB has ignored those work efforts as well as calls from the community to address a comprehensive basin wide path forward.

Throughout the history of the Chehalis Basin Strategy (CBS), the programs to address flood damage reduction have operated in silos, with a lack of coordination and accountability across programs. This has resulted in instances where flood damage reduction projects directly contributed to the degradation of aquatic species habitat, and overall, this approach has resulted in additional costs that could have been mitigated or avoided entirely through a unified effort. We strongly encourage the OCB to work with the Tribes in the basin to review and revise its governance structure to implement all components of the CBS more effectively. Particularly, the flood damage reduction arm of the CBS is in desperate need of a collaborative interdisciplinary structure to unite diverse interests and develop an actionable plan. The process of identifying and working towards action on cross-cutting issues has been initiated. This needs to be expanded to include integration and strategy alignment between the flood damage reduction efforts and the Aquatic Species Restoration Plan (ASRP).

The flood damage reduction strategy has not had a technical review process or advisory group. In order for the CBS to be fully integrated, there needs to be a shared science, engineering, monitoring and adaptive management component between flood damage reduction and the ASRP to review and advise on technical topics, evaluate project and program effectiveness, and recommend adaptive management.

The proposal in the upcoming biennium budget to allocate an additional \$20 million to the proposed dam, particularly the \$6 million proposed for preliminary engineering for permit applications, creates the appearance that the OCB has simply moved past completion of the environmental analysis process and predetermined which flood damage reduction actions will be taken. While we agree that the environmental analysis process

should be completed, we do not believe it is a wise use of state funds to proceed with funding designs for permitting of a structure that has yet to receive approval for construction. Doing so undermines the credibility of the environmental analysis process and the very purpose the Chehalis Basin Board (CBB).

The recommendation for an additional \$14 million to complete the environmental review process, while at the surface appears reasonable, with a bit of additional scrutiny, it becomes evident that the total funding for the process would be well over \$40 million- nearly all of which has been allocated to a single contractor. Given this quantity of funding, our expectations for the quality of the Environmental Impact Statement (EIS) were much higher than the product that has been presented thus far. Increased oversight of the fiduciary components of this process seems appropriate.

We are curious about the sudden interest by the OCB to analyze the Skookumchuck dam for removal or retrofitting. While we agree that such analysis may be warranted, the timing of this interest is suspicious. Given the magnitude of work that needs to be done to restructure the OCB and develop a comprehensive flood damage reduction plan, we are concerned that this additional distraction will be a deterrent from progress on current initiatives and very concerned that any efforts on the Skookumchuck dam could be misconstrued as mitigation for the proposed dam structure. Removal or retrofitting of this dam was part of early ASRP considerations, and as was highlighted by numerous commentors and confirmed by OCB during the environmental review process, actions taken as part of the ASRP are separate from and not to be considered as mitigation for the proposed dam structure.

We are fully cognizant that given shifting climate patterns, the Basin is at risk of flooding every winter. In previous correspondence, we have called for an acceleration of efforts that will reduce flood damage risk for residents in the near-term, are proven solutions, and are a wise investment for the Chehalis Basin. We believe that the \$3 million proposed for actions in the Community Flood Assistance and Resilience program is not sufficient, and funding that supports acquisitions, retrofitting and flood proofing for residents throughout the Basin should be prioritized.

While conceptually the CBS was envisioned to be fully integrated, as described above, that has yet to come to fruition and is further evidenced by the proposed allocations of the biennial budget. As proposed, \$33 million would go towards Aquatic Species and Habitat, nearly \$40 million to Flood Damage Reduction, and nearly \$7 million to 'Integrated' efforts. We find it puzzling that on appearance, funding for the Integrated portion comes entirely from the Aquatic Species and Habitat funding pot. If these projects are actually integrated, shouldn't they be funded equally from each component of the CBS?

We ask that the CBB reject the budget as currently proposed, and that the OCB work to address the myriad of concerns, in future budget iterations. Now is the time to work collaboratively to develop a comprehensive, basin wide LAP that will set success into motion for the entire Basin. The budget and workplan for the coming biennium need to reflect this. We hope that we can help you on this path forward – for the Chehalis River Basin, its communities, ecosystems, and all people of Washington State.

Sincerely,

Chehalis River Alliance

Membership information available at: www.chehalisriveralliance.org