

MEMORANDUM

Date: June 4, 2020
To: Chehalis Basin Board
From: Gordon White, Washington Department of Ecology
Re: Preliminary Summary of SEPA Draft EIS Comments

SEPA Draft EIS Comment Overview

The State Environmental Policy Act (SEPA) draft Environmental Impact Statement (EIS) comment period was held from February 27 to May 27, 2020. Due to the COVID-19 response, the comment period was extended to allow more time for public comment and the two in-person events were changed to use an online webinar format.

A total of 4,839 comments were received. 996 comment submissions were received from tribes, agencies, organizations, businesses, and the general public. This includes individual letters, online submissions, and comments received at the two public webinars. 3,843 comments were received as form letters or petitions.

This memorandum is intended to provide an early look for the Chehalis Basin Board as comments are still being reviewed and compiled. A more comprehensive summary of the comments will be provided at the July Chehalis Basin Board meeting.

SEPA Draft EIS Comment Summary

Comments are summarized below by resource area in the order they appear in the draft EIS. Comments will be reviewed and considered for the final EIS, and all comments will be valued equally. Responses to comments will be included in the final EIS.

- Purpose of Proposed Project
 - The purpose of the Proposed Project is too narrow because it is only intended to reduce flood damage for part of the basin, address floods coming from only one part of the basin, and only for some flood events.
 - The potential expansion of the flood retention facility in the future should be analyzed.
- Scope of Study
 - The study area should be larger/basin-wide.
 - Storm events from other rivers and areas should be included in the scope.
- Climate Change
 - Climate change will lead to more flooding and more impacts than analyzed.

- Project impacts in the future should be analyzed separately from climate change.
- Project impact analysis should include more ranges of climate change.
- FRE inundation frequency is underestimated.
- FRE inundation frequency and area is overestimated.
- Climate change impacts are underestimated.
- Climate change impacts are overestimated.
- Additional climate change analysis and modeling is needed to determine impacts.
- Proposed Project
 - Support for the Proposed Project.
 - Opposition for the Proposed Project.
- Local Actions Alternatives
 - More specific local projects should be included in the analysis.
 - Support for the Local Actions Alternative, including elevating homes, buying out at-risk structures, and implementing local flood protection measures.
- No Action Alternative
 - Impacts for the No Action Alternative are underestimated and need more analysis.
 - Specific restoration actions should be identified and analyzed, including basin-wide efforts and the Aquatic Species Restoration Plan.
 - Support for the No Action Alternative.
- Water
 - Flooding in the future was underestimated so impacts would be greater for the proposed project and alternatives.
 - The project will worsen water quality issues and raise the water temperature to a greater degree than was analyzed.
- Earth
 - Additional analysis is needed for fine sediment transport in the reservoir and downstream.
 - Logging impacts contributing to water runoff not adequately analyzed.
 - Landslide impacts underestimated.
 - Additional analysis needed on impacts to river confluences downstream.
- Fish Species and Habitats
 - Impacts to fish and their habitat underestimated.
 - Fish modeling inadequate or used incorrect assumptions and underestimated impacts.
 - Additional analysis needed on predation and food availability to salmon.
 - Additional analysis needed on impacts to salmon juveniles and non-salmon species from fish passage during construction and operations.
 - Additional analysis needed for native fish, lamprey, chum salmon, and amphibians.
 - Mitigation for fish species and habitat is not feasible or cost effective.

- Southern Resident Killer Whales
 - Impacts to Chinook salmon affecting the Southern Resident killer whale population needs more analysis.
 - Increasing importance of coastal stocks were not considered.
 - Impact finding should be significant, not moderate.
- Wildlife Species and Habitats
 - Loss of habitat would threaten wildlife including endangered species and impacts are underestimated.
 - Additional analysis of impacts to wildlife corridors needed.
 - Analysis needed for buffer area around the inundation area.
- Tribal Resources
 - Tribal resource impacts should be more explicitly identified and include findings of significance.
 - Impacts to tribal treaty fishing rights are underestimated.
- Land Use
 - More analysis is needed on the risk of the Proposed Project increasing future flood damage if it triggers more floodplain development.
- Cultural Resources
 - Cultural resource impacts should include findings of significance.
- Environmental Justice
 - Environmental justice impacts to tribes was not considered.
- Transportation
 - Additional analysis of forest road network and impacts to Weyerhaeuser private roads needed.
- Cumulative Impacts
 - Cumulative impacts, particularly to fish and wildlife, are underestimated.
- Mitigation
 - Mitigation proposed in the EIS is not technically feasible for fish, wildlife, habitat, water, earth, wetlands, air quality, recreation, or environmental health and safety.
 - Mitigation proposed in the EIS is feasible.
 - Mitigation plans need more detail.
 - More information is needed on the uncertainty of funding and implementation of mitigation.
- EIS Format
 - Cost benefit analysis should be included.
 - Benefits of proposed project should be included.

Comments Were Submitted By:

Tribes

- Confederated Tribes of the Chehalis Reservation (The Chehalis Tribe)
- Cowlitz Indian Tribe
- Lower Elwha Klallam Tribe
- Quinault Indian Nation
- Skokomish Indian Tribe
- Suquamish Tribe
- Tulalip Tribes

Agencies

- Chehalis River Basin Flood Authority
- Chehalis River Basin Flood Control Zone District (Applicant for Proposed Project)
- City of Centralia
- National Marine Fisheries Service
- Port of Centralia
- Port of Chehalis
- U.S. Fish and Wildlife Service
- Washington Department of Fish and Wildlife

General Public, Businesses, and Organizations

Members of the general public provided approximately 946 comments.

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| • American Rivers | – Duna Fisheries, LLC |
| • American Whitewater* | – F/V Arminta |
| • Center for Environmental Law and Policy | – Fish Not Gold |
| • Chehalis Basin Fisheries Task Force | – The Lands Council |
| • Chehalis River Alliance with Washington Wild, including the following signatories: | – MiiR |
| – Adventures Northwest Magazine | – Mountain Gear, Inc. |
| – Art Wolfe, Inc. | – National Outdoor Leadership School |
| – Black Hills Audubon Society | – Native Fish Society |
| – Cascade Forest Conservancy | – North Cascades Conservation Council |
| – Center for Biological Diversity | – North Sound Trout Unlimited |
| – Citizens for a Clean Harbor | – Northwest Watershed Institute |
| | – Olympic Park Associates |
| | – Orca Behavior Institute |

- Pacific Whale Watch Association
- Rising River Farms
- Salish Sea Ecosystem Advocates
- The Salish Sea School
- Save Our Wild Salmon Coalition
- Sky Valley chapter of Trout Unlimited
- Vancouver Audubon Society
- Vancouver Wildlife League
- Vet’s Café
- Washington Wildlife Federation
- Whale and Dolphin Conservation
- Whale Scout
- Wild Fish Conservancy
- Wild Orca
- Willapa Hills Audubon Society
- Climate Impacts Group
- Coast Salmon Partnership
- Conservation Angler
- Conservation Northwest*
- Defenders of Wildlife
- Deschutes Estuary Restoration Team*
- Earth Ministry*/Washington Interfaith Power & Light
- Eastside Audubon Society
- Environment and Climate Caucus of the Washington State Democratic Central Committee
- Exodus Engineering
- Foggy 48 Farms, LLC
- Friends of Clark County
- Friends of Grays Harbor*
- Grays Harbor Audubon Society*
- Great Old Broads for Wilderness*
- League of Women Voters of Washington*
- Lewis County Farm Bureau
- North Sound Baykeeper
- Northwest Indian Fisheries Commission
- Orca Conservancy*
- Orca Network*
- Orca Salmon Alliance
- Pacific Rivers*
- Panesko Tree Farm
- Spokane Riverkeeper
- Steelhead and Salmon Conservation Society (via oral comments at public hearing)
- Trout Unlimited
- Twin Harbors Waterkeeper*
- Washington Fly Fishing Club
- Washington State Dairy Federation
- Washington State South Sound Chapter of the Sierra Club*
- Washington Surfrider Foundation
- Weyerhaeuser
- Whidbey Environmental Action Network
- Wild Salmon Center*
- Wild Steelhead Coalition*

*This entity is also a signatory on the Chehalis River Alliance with Washington Wild comment letter.

Form Letters/Petitions

- American Whitewater
- Center for Biological Diversity
- Chehalis River Alliance
- Chehalis River Alliance with Washington Wild
- Conservation Northwest
- Defenders of Wildlife
- Sierra Club
- Wild Salmon Center