



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

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September 23, 2021

Chehalis Basin Board  
Office of Chehalis Basin  
P.O. Box 47600  
Lacey, WA 98504-7600

Dear Board Members,

I am writing on behalf of the Washington Department of Fish and Wildlife to share some thoughts and suggestions for the Chehalis Basin Strategy (Strategy).

WDFW values the work of the Chehalis Board to identify a multiple benefit strategy that enhances flood safety and restores and protects aquatic ecosystems and species. Significant progress toward meeting the needs of human communities, fish, and wildlife requires all key players to see their interests being advanced by an agreement, even – and maybe especially -- if the agreement requires all involved to support (or at least tolerate) actions they would not support in isolation.

As WDFW looks back at a difficult summer for the Chehalis process, and looks forward toward the remainder of this biennium, it becomes apparent that an agreement setting out a long-term road map for the Strategy in advance of the 2023 legislative session would display that real progress can be made in the basin.

WDFW has consistently stated that we are prepared to support a comprehensive flood management and aquatic species restoration strategy that leaves salmon and steelhead, other aquatic species, and their habitats substantially better than currently projected. As the process has matured, what it will take to meet that goal for WDFW is becoming clearer. WDFW sees the following as prerequisites, in some form at least, for a successful long-term, multiple benefit Chehalis Basin Strategy (Strategy):

- 1) Significant improvements in Skookumchuck River spring Chinook and steelhead populations via either removal of Skookumchuck Dam or installation of a state-of-the-art fish passage system. Ongoing studies will inform whether dam removal or fish passage is preferable. These studies will need to be sufficiently detailed by the fall of 2022 to allow the Board to understand how the future of the Skookumchuck Dam fits into a roadmap for the broader Strategy.

- 2) Complete implementation of the Aquatic Species Restoration Plan (ASRP) over the next 30 years, with a funding mechanism to provide certainty of implementation.
- 3) Implementation of what is now being called a “Local Actions Non-Dam (LAND) Alternative,” as either a substitute or complement for a new flood retention dam on the mainstem Chehalis River. WDFW is pleased that the Board voted to support the development of a LAND alternative and we look forward to supporting that process.
- 4) Adoption of a land use plan and updated local rules to prevent additional development in the Chehalis floodplain. Regardless of the flood management strategy chosen, the floodplain must be protected from additional development if there is to be certainty that gains from the ASRP and other Strategy actions to benefit fish are to be realized and retained over time. Land use commitments will also provide more certainty of flood safety for communities and infrastructure.
- 5) Agreement on a phased implementation plan to ensure equitable implementation among different Strategy goals over time. Such a plan was a key factor in the success of the Yakima Basin Integrated Plan, and it is equally necessary to include in the Chehalis Strategy. No long-term commitment should be made to any component of the Strategy until there is agreement on an implementation plan. The plan should be negotiated to respond to different potential outcomes over the course of Strategy implementation, including how it will respond to potential delays affecting one or more planned projects or strategy elements.
- 6) WDFW encourages all parties to pause on actions that will force issues ahead of having all the pieces of the package in place for making a decision on an integrated approach. This would include proponents of the flood retention dam refraining from moving the facility into permitting, and potential opponents to a dam refraining from formal legal challenges until the processes and studies pertaining to the Skookumchuck Dam, ASRP, LAND alternative, land use protections, and efforts to agree on a phased implementation pathway are complete. Only then will the Board be able to make a fair judgment on how the Strategy might (or might not) offer sufficient promise to justify a long-term commitment to the compromises inherent in any negotiated multi-decade integrated water/flood management plan.

Identifying a path forward for Chehalis Basin flood management and aquatic species restoration will be a challenge for all involved and require reconsidering some hardened positions. However, creating the space and time to negotiate a durable implementation plan for a broadly supported Strategy is likely the only way to avoid a more consequential and lasting impasse.

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Thank you for considering WDFW's suggestions, and my staff and I stand ready to contribute to a broad and durable agreement that will benefit the communities, fish and wildlife, and farms of the Chehalis Basin.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly Susewind", with a large, sweeping flourish at the end.

Kelly Susewind  
Director