



April 21, 2020

SENT Via Comment Form:

<https://chehalisbasinstrategy.com/eis/comment-form/>

SEPA Draft EIS for Chehalis Flood Damage Reduction Project
c/o Anchor QEA
1201 Third Ave., Suite 2600
Seattle, WA 98101

RE: Proposed Chehalis River Basin Flood Damage Reduction Project

Dear Washington State Department of Ecology:

In 2008 and 2009, a majority of jurisdictions on the Chehalis River Basin Flood Authority (Flood Authority) adopted resolutions in favor of a basin-wide flood plan that included support for a science-based evaluation of a water retention facility above Pe Ell. In 2016, the Flood Authority as a whole, and many of its member jurisdictions individually, adopted resolutions and statements of support favoring Alternative 1 of the Department of Ecology's Programmatic EIS. Alternative 1 (combination of flood retention structure, floodproofing structures, improvements to land use management, local projects and aquatic habitat restoration) was regarded as the most beneficial combination of flood protection and aquatic species enhancement in the Chehalis Basin with the least amount of adverse impact.

Today, our views as a whole remain the sameⁱ. We need solutions that provide the most beneficial combination of flood protection and aquatic species enhancement in the Chehalis Basin with the least amount of adverse impact.

We'd like to offer our perspective, as well as that of the communities we serve, on seeking balanced solutions for people, fish and aquatic species.

The draft environmental impact statement on the Chehalis River Basin Flood Control Zone District's Chehalis River Basin Flood Damage Reduction Project identifies:

1. Benefits of significant reduction in catastrophic levels of flooding for communities from Pe Ell to Montesano and further downstream. Flood levels for much of the study area would be reduced by 3 to 5 feet (Summary, pg. S-9, [here](#)), as well substantial reductions in impact and flood inundation for thousands of valuable structures critical for post-disaster recovery, e.g.,

essential public infrastructure (wastewater treatment plants, water treatment plants, drinking water supplies, roads, bridges, I-5, etc.), homes, schools, churches, small businesses, business parks, industrial facilities, port districts, hospitals and more.

2. Impacts to several fish, aquatic species and their habitat that are considered unavoidable unless mitigation considered to be technically feasible and economically practicable is found (Summary, pg. S-8, [here](#)).

In our view, we are confident there are balanced and valid pathways forward that will gain for one-and-all the benefits of the proposed Chehalis River Basin Flood Damage Reduction Project and the mitigation necessary to offset any impacts. In addition to the initial technical mitigations identified in the DEIS (Exhibit S-6, pg. S-13, [here](#)), we believe there is also an additional and highly relevant background context that should be acknowledged and incorporated into the Final EIS. More specifically:

1. ***Institutional Capacity*** – The Chehalis Basin is unique in that we have tremendous institutional capacity to see through mitigation obligations necessary to technically and practicably address impacts to fish, aquatic species and their habitat. In addition to the capacity we as the Flood Authority provide, we also have the Chehalis Basin Strategy, the Chehalis Basin Board and the Chehalis Basin Flood Control Zone District. Together, this combination of Flood Authority, Strategy, Board and District provide unprecedented capacity to ensure essential mitigations are funded, implemented and results achieved. The track-record to date of this combination is undeniable – local flood damage reduction projects; aquatic species habitat investments; long-term strategy (roadmap); committed stakeholders; etc.
2. ***Innovation*** – Washington State has a long track-record of successfully innovating in the face of challenging governance. A case in point is Ecology’s work with stakeholders and regulatory interests to craft and implement a highly successful advance wetland impact mitigation program (<https://ecology.wa.gov/Water-Shorelines/Wetlands/Mitigation/Advance-mitigation>). While we’re not taking a position on the relevance or non-relevance of advance mitigation for this project, we are taking a position of support for Ecology’s proven track-record of finding solutions to difficult governance issues (e.g., wetland impact mitigation).

We believe with the institutional capacity identified above, as well proven examples of innovation (like advance mitigation to proactively address wetland impacts), we can achieve the technically feasible and economically practicable mitigation our communities, citizens and stakeholders deserve. Together we can achieve the most beneficial combination of flood protection and aquatic species enhancement in the Chehalis Basin with the least amount of adverse impact, and in so doing reduce flood impacts and bolster fish runs through aggressive habitat investment.

Thank you for your consideration of our perspectives as citizens of the Chehalis Basin. We, too, seek on a daily basis to balance projects and decision-making for the benefit of people, fish and local, state and tribal interests. Please feel free to contact either of us if you have any questions. You may also contact Scott Boettcher (Flood Authority staff) at 360/480-6600, scottb@sbgh-partners.com.

Sincerely,



Vickie Raines, Chair
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Edna Fund, Vice-Chair
Chehalis River Basin Flood Authority
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CC: Andrea McNamara Doyle, WA State Office of Chehalis Basin
Chehalis River Basin Flood Authority members
Chehalis Basin Board members

i. Chehalis River Basin Flood Authority is comprised of representatives from Lewis County, Grays Harbor County, Thurston County and the following cities and towns: Centralia, Chehalis, Napavine, Pe Ell, Aberdeen, Cosmopolis, Hoquiam, Montesano, Oakville and Bucoda. Thurston County's position of support for the Flood Retention Expandable Facility portion of the project is at this time contingent upon finding sufficient, technically feasible mitigation.

Submittal of Comment Letter on Behalf of Chehalis River Basin Flood Authority

4/21/2020

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HOME STRATEGY OFFICE OF CHEHALIS BASIN FLOOD PROTECTION HABITAT RESTORATION GET INVOLVED RESOURCES

Name (optional)
Scott Boettcher, Staff

Organization (optional)
Chehalis River Basin Flood Authority

Email (optional)
scottb@sbgh-partners.com

County/State (optional)
Grays Harbor, Lewis, Thurston Counties; Wash

Comments
Attached please find letter being submitted on behalf of the Chehalis River Basin Flood Authority regarding the Draft Environmental Impact Statement. Feel free to call or email with questions. Thank you. Scott Boettcher, Staff, Chehalis River Basin Flood Authority, 360/480-6600, scottb@sbgh-partners.com.

Attach files using the buttons below:
 Final CRBFA ...-21-2020.pdf No file chosen

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