

American Whitewater • Friends of Grays Harbor • Twin Harbors Waterkeeper  
Wild Salmon Center • Wild Steelhead Coalition • Washington Chapter Sierra Club

October 18th, 2019

Senator Murray  
Senator Cantwell  
Representative Herrera-Beutler  
Representative Heck  
Representative Kilmer

Dear Members of Congress Representing the Chehalis Basin:

As organizations strongly opposed to construction of a new dam on the Chehalis River we write to express our concerns with the Chehalis River Basin Flood Damage Reduction Project. As an alternative, we encourage Washington State to partner with federal resource agencies to fully develop a Restorative Flood Protection alternative, begin project-level environmental analysis and investment in structural flood protection that does not include construction of a dam, and expand the scope and investment in Local-Scale Flood Reduction and Aquatic Species Habitat Actions.

Alternatives to a dam should provide for a comprehensive response that integrates reducing flood damage and restoring aquatic species habitat within the Chehalis Basin. We are concerned that the proposed dam would not be as effective as advertised at providing the flood damage reduction services for rain events in the Upper Chehalis watershed; it would not provide any flood damage reduction benefit for localized rain events in major tributaries including the South Fork Chehalis, Newaukum, Skookumchuck, Satsop or Wynoochee watersheds.

The Chehalis River is the second-largest river in the state of Washington and one of the few remaining river systems without listed steelhead or salmon species under the Endangered Species Act.

### **Impacts of the Proposed Dam**

Direct impacts of a dam and effects of an inundation zone—even for temporary periods of time—on mainstem spawning and rearing habitat for salmon and steelhead would be significant with proposed clearcutting within the reservoir footprint and complete removal of riparian vegetation. Impacts, including those from associated road-building, would include increased sediment delivery, reduced shading, increased summer water temperatures, altered hydrology and sediment transport, impacts to spawning and rearing habitat, and extensive loss of riparian habitat. Clearcutting tributary junctions would negatively impact biological hotspots and have a disproportionate impact on biodiversity.

Impacts to fishery resources would include loss or destruction of spawning habitat and salmon redds when the reservoir is filled, impaired accessibility to critical cold water rearing habitat, salmon and steelhead redd scouring immediately downstream of the dam, fragmentation of habitat with reduced floodplain connectivity and complexity, loss of riparian forest and associated ecosystem services, precluded opportunities to restore the health of the riparian forest, new fish passage challenges, and severe disruption of sediment transport essential to the maintenance of fish habitat.

In addition to the individual impacts, the cumulative impacts of a new dam would be significant given threats salmon and steelhead are already facing in the watershed. Impacts to salmon and steelhead would also result in cascading impacts to other species. Salmon, and particularly Chinook salmon, represent a critical winter food source for Endangered Southern Resident Killer Whales (SRKW) and Governor Inslee has called for immediate actions to address the issue of inadequate prey (i.e. salmon that represent a primary food source for SRKW). Many have called for the removal of dams to rebuild salmon runs for the benefit of SRKW, and a new dam contemplated for the Chehalis would have significant impacts on their primary prey source.

A new dam on the Chehalis River would permanently foreclose use of this reach of the Chehalis River for whitewater kayaking, rafting, and fishing. Outdoor recreation is important to our quality of life in the Pacific Northwest. We should be seeking ways to improve opportunities to enjoy outdoor recreation and access to our waterways and not further limit them.

The long-term sustainability of a dam has not been analyzed in light of the significant operations and maintenance costs. A cost benefit of the proposed structure is not even being conducted as part of the required environmental review process. This is a critical misstep and should be a required review component. The plan for agency oversight and management of a dam—addressing the fundamental question of who would own and operate the facility—also has not been addressed.

## **Conclusion**

In his book *King of Salmon*, David Montgomery reviews the strikingly similar stories of salmon declines in Europe, American-Canadian Northeast, and the Pacific Northwest. He closes with the choice our region faces, a choice that can be directly applied to the future of the Chehalis Watershed:

*In the end, the resurrection or destruction of salmon will come down to moral and ethical issues—to value the choices that society can make explicitly or continue to make implicitly. Do we want salmon in our rivers? Are we willing to drive species knowingly to extinction even if only by looking the other way? The solution is really not all that mysterious. We simply cannot keep on doing things the way we've been doing them, or we risk losing salmon. The choice is ours; the future is not. The sixth H in the salmon story also is ours to choose. Will it be hubris or humility?*

We can continue the mistakes of the past and apply centuries-old solutions to address the impacts of floods on free-flowing rivers, or we can take a new path that integrates reduction of flood risk with restoration of aquatic species habitat.

Sincerely,

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
American Whitewater

Arthur (R.D.) Grunbaum, President  
Friends of Grays Harbor (FOGH)

Lee First  
Twin Harbors Waterkeeper

Margie VanCleve  
Chair Conservation Committee  
Washington Chapter Sierra Club

Jessica L. Helsley  
Washington Director  
Wild Salmon Center

Rich Simms  
Founder/Board Member  
Wild Steelhead Coalition