



October 28, 2025

Kelsey Jolley, Spirit Lake NEPA Coordinator
U.S. Forest Service
987 McClellan Road Vancouver, WA 98661

Subject: Comments on Draft Environmental Impact Statement for the Spirit Lake
Outflow Safety Improvement Project

Dear Kelsey Jolley,

The Lower Columbia Fish Recovery Board (LCFRB) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Spirit Lake Outflow Safety Improvement Project. As one of the eight regional salmon recovery organizations in Washington State, the LCFRB is charged by statute with developing and facilitating implementation of a salmon and steelhead recovery plan for the Lower Columbia Region of Washington. In that capacity, the LCFRB led the collaborative development of the state and federally adopted [Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan](#) (recovery plan) and is now charged with overseeing and coordinating implementation. The focus of this locally-developed recovery plan is to restore at-risk fish to healthy and harvestable levels. Our work is guided by a 15-member board that includes representatives from local governments, the state legislature, the Cowlitz Indian Tribe, hydropower operators, environmental and landowner interests, and the public. We are pleased that the U.S. Forest Service has prepared a DEIS for this project, as the Toutle River subbasin is regionally important to recovery efforts. We offer the following comments for your consideration.

The Toutle River watershed supports eight populations of salmon and steelhead that are listed under the federal Endangered Species Act (ESA). In the North Fork Toutle, fall and spring Chinook, chum, coho, and winter steelhead all remain at “very low” viability, and are showing little sign of recovery progress. As noted in the recovery plan, lack of access to up to 50 miles of historic habitats in the North Fork Toutle is a major factor limiting recovery, especially for spring Chinook, coho and steelhead. The recovery plan therefore calls for restoration of fish access to isolated and blocked habitats as a high priority recovery action. In light of this, the LCFRB has been working with the Cowlitz Indian Tribe, Washington Department of Fish and Wildlife (WDFW), the Lower Columbia Regional Fish Enhancement Group (LCFEG), Wild Salmon Center, and other partners to support efforts to reintroduce salmon and steelhead into all suitable habitat, both upstream and downstream of the Sediment Retention Structure (SRS).

In reviewing the draft alternatives, Alternative 7 would best align with the LCFRB's mission and recovery goals for the Toutle River watershed. This alternative addresses near- and long-term safety risks to downstream communities by constructing a new pressurized tunnel, while restoring a natural connection between Spirit Lake and the North Fork Toutle River over the long-term. Establishing a surface water connection to Spirit Lake using nature-based designs will help ensure reintroduced fish populations have full access to all suitable habitats in the basin, which will support much needed viability improvements for salmon and steelhead. It would also leverage benefits associated with ongoing habitat restoration programs in both the North and South Fork Toutle subbasins. However, this alternative should be strengthened in the final EIS by establishing a firm commitment to developing a funding, monitoring and adaptive management plan, as well as explicitly supporting downstream efforts improve sediment attenuation and habitat conditions through floodplain restoration.

Thank you for the opportunity to provide these comments. If you have any questions or need additional information, please feel free to contact via phone at (36) 425-1553 or via email at smanlow@lcfrb.gen.wa.us.

Sincerely,



Steve Manlow
Executive Director

Cc: Christina Donehower, Cowlitz Indian Tribe
Bill Sharp, Yakama Nation Fisheries
Bryce Glaser, WDFW
David Howe, WDFW
Morgan Morris, Lower Columbia Regional Fish Enhancement Group
LCFR Board