



October 28, 2024

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

Subject: Comments on September 30, 2024 Notice of Intent (NOI) to prepare an
Environmental Impact Statement (EIS) for the Spirit Lake Outflow Project

Dear Kelsey Jolley,

The Lower Columbia Fish Recovery Board (LCFRB) appreciates the opportunity to provide comments on the above-referenced NOI to prepare an EIS for the Spirit Lake Outflow 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 is preparing an EIS 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).

The LCFRB is pleased that the USFS has included construction of an open outlet channel as one of the alternatives that will be evaluated in the Draft EIS. This alternative should focus on designing and constructing a surface channel that provides spawning and rearing habitat, is adaptable to changing environmental conditions, establishes unobstructed fish passage into Spirit Lake, and poses no increased risk to downstream communities. This alternative should include construction that is on a parallel timeline to outlet tunnel rehabilitation. 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.

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