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Submitted electronically via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=66482>

Re: Comments on the Draft Environmental Impact Statement for the Spirit Lake Outflow Safety Improvement Project (DEIS #66482)

Dear Ms. Kovarik,

On behalf of the Lower Columbia Fish Enhancement Group (LCFEG), I am writing to express our strong support for the Preferred Alternative 7 – Phased Natural Habitat Channel Formation, as described in the Spirit Lake Outflow Safety Improvement Project Draft Environmental Impact Statement (August 2025).

LCFEG supports this alternative because it achieves the core purpose of the project—improving public safety through redundant, controllable outflow systems—while also advancing the long-standing ecological objective of restoring volitional fish passage and hydrologic connectivity between Spirit Lake and the North Fork Toutle River. As outlined in the DEIS, Alternative 7 provides the greatest balance of engineering safety, ecological function, and community support, aligning with the multi-criteria decision framework developed by NASEM (2018).

The combination of a new pressurized tunnel with a lowered intake (3,400 ft elevation) and a phased, natural-process-driven channel offers multiple layers of redundancy that significantly reduce catastrophic-failure risk associated with a single-structure system. By enabling controlled lake-level management and adaptive implementation of channel formation, Alternative 7 minimizes the likelihood of debris-blockage breach while providing a safe pathway toward a stable, nature-based outflow configuration.

From a restoration perspective, this alternative uniquely restores the historic ecological connection that existed before the 1980 eruption, when anadromous salmonids accessed Spirit Lake. The phased habitat-channel component will allow volitional passage and natural sediment and nutrient exchange, promoting the recovery of aquatic ecosystems throughout the upper Toutle basin. The DEIS also notes that Alternative 7 “fully supports the community value on environmental benefits of healthy ecosystems” and is preferred by affected Tribes and conservation stakeholders for its ability to reconnect Spirit Lake safely and sustainably. LCFEG further agrees with the DEIS



assessment that Alternative 7 provides one of the safest operational profiles of all evaluated options. The inclusion of a pressurized tunnel as a redundant control mechanism, along with adaptive channel-formation methods, ensures continued outflow reliability under variable hydrologic, seismic, and geologic conditions, thereby enhancing both public safety and long-term watershed resilience.

For these reasons, LCFEG strongly encourages the Forest Service to select and advance Alternative 7 as the preferred path forward in the Final Environmental Impact Statement and Record of Decision. This approach represents the most scientifically sound and publicly supported balance between human safety and ecological restoration within the Mount St. Helens landscape.

Thank you for the opportunity to comment on the Draft EIS and for your leadership in pursuing durable, science-based solutions for the Spirit Lake system. LCFEG looks forward to continued collaboration to ensure that the selected alternative upholds both safety and ecosystem recovery across the North Fork Toutle River basin.

Sincerely,
Morgan Morris
Executive Director
Lower Columbia Fish Enhancement Group