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First name: Caitlin

Last name: Roesler

Organization: US Environmental Protection Agency Region 10

Title: NEPA Reviewer

Comments: [Please see PDF attachment. Copied and pasted text below]

October 30, 2025

Kelsey Jolley

Gifford Pinchot National Forest

U.S. Forest Service

987 McClellan Road

Vancouver, Washington 98661

Dear Kelsey Jolley:

The U.S. Environmental Protection Agency has reviewed U.S. Forest Service's August 2025 Draft Environmental Impact Statement for the Spirit Lake Outflow Safety Improvement Project. The DEIS evaluates a range of outflow safety measures (e.g., tunnel rehabilitation, pressurized tunnel conversion, natural habitat channel formation) to address the aging outflow tunnel. Pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act, the EPA is required to review and comment publicly on any proposed federal action subject to the NEPA's environmental impact requirement. The EPA appreciates that both preferred alternatives avoid causing major, direct, and adverse impacts to riparian reserves, wetlands, and streams.

The DEIS discusses the applicability of Clean Water Act § 404 with respect to compensatory mitigation. Regarding the implementation of alternative 7, CWA § 404 may also apply for the two connections of the new natural channel at Spirit Lake and at its downstream waterbody connection. Recognizing that this would have to be phased process, we recommend that the Final EIS include a discussion of the potential future permitting process.

The EPA appreciates and supports the Forest Service's collaborative efforts to protect public safety and environmental resources by addressing current adverse conditions that contribute to the risk of catastrophic lake outflow failures.

Thank you for the opportunity to review the DEIS for this project. If you have questions about this review, please contact Caitlin Roesler of my staff at 206-553-6518 or at roesler.caitlin@epa.gov, or me, at 206-553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Manager

NEPA Branch