

May 22, 2020

Gifford Pinchot Forest Supervisor
987 McClellan Road
Vancouver, WA 98661

Subject: OBJECTION to Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project Notice of Proposed Action

Dear Gifford Pinchot Forest Supervisor and Monument Ranger Hoffman:

I am a doctoral candidate at Portland State University, and have previously commented and objected to the proposed Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project. I continue to object to this project because of the inherent and irreparable damage the proposed construction will cause in a fragile, unique ecosystem. My previous comments are incorporated here.

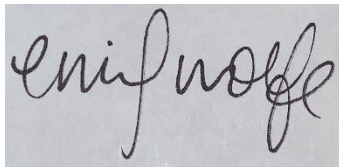
My dissertation research will be directly impacted by the proposed construction. My research investigates plant-microbe interactions during plant growth, senescence, and in-stream decomposition using the Pumice Plain as the model of primary succession that it embodies. Data from the 2017 field season indicate that colonization by culturable foliar fungal endophytes is very low on the Pumice Plain, compared to nearly 100% colonization rates in the urban areas surrounding Portland, OR. These data should underscore the fragility of the Pumice Plain, and also the incredible opportunities there for scientific research and discovery. The proposed road would cross and irreparably damage habitat and water quality of all streams on the Pumice Plain, negatively affecting any research projects associated with the streams or the riparian vegetation. Mount St. Helens has served as an extremely special research site for decades, but the proposed construction of a road across the Pumice Plain threatens to destroy these long-term efforts.

As I have previously raised during in-person meetings, I have personally interacted with monument visitors that have utterly ignored posted signage, and ridden dirt bikes down to the researcher parking lot to fly a drone. I have encountered several people on the Truman and Loowit Trails that have asked about how to hike down to the shores of Spirit Lake, and were clearly unreceptive to being told that they needed to stay on trails. Additionally, I have been approached multiple times in the Windy Ridge parking lot by visitors that have seen me come through the locked gate. They almost always demand to know how they can get access as well. It is foolish to think that a gate and signs will stop visitors from illegally accessing roads once they are built, because the current gate and signs have done nothing to stop unauthorized usage. The proposed road would be visible from any viewpoints that offer views of the Pumice Plain, including Windy Ridge, Bear Pass, and Johnston Ridge Observatory. In the five years I have worked in the area, I have seen a consistent lack of USFS personnel at Windy Ridge during the summer field season. The construction of a road will simply encourage more unauthorized and potentially damaging or dangerous use by monument visitors that already disregard road closures and signage in the absence of USFS personnel. I also fear the long-term fate of the road. Once it is there, will the USFS decide to open it to the public? There is clearly public interest, if the interactions at Windy Ridge are any indication. The road cannot be undone once made.

The proposed road is antithetical to your own document: According to Appendix A, the Drilling 2 alternative, “It would be less feasible and illogical to develop two separate motorized routes. In addition, two separate routes would greatly increase the impact to the natural environment.” The USFS has already chosen to build one motorized route down to Duck Bay, which has since washed out every season. Please reconsider this decision and at least consider the helicopter option to allow the Pumice Plain to “respond naturally to the disturbance” (per the USFS/MSHNVM website). I have both heard and seen helicopter tours around the mountain while working on the Pumice Plain. If those tours are able to operate, it seems logical that the USFS would be able to coordinate flights as well. There must be a solution that does not involve destroying land that the monument was created to preserve and protect. A more in-depth analysis of the environmental impact should be undertaken (i.e. Environmental Impact Statement), and a true cost-benefit analysis of different equipment transportation options should be included to better understand why more invasive actions outweigh protecting the environment and ongoing and future scientific research.

Finally, I am disappointed that the notification of the comment period occurred over the holidays. It certainly seems as though the USFS is trying to limit opportunities for public comment to push through this proposed action. However, given that I have previously commented, I hope that this objection may still stand.

Thank you for your time and consideration.

A handwritten signature in black ink, reading "Emily Wolfe", on a light-colored background.

Emily Wolfe
PhD candidate
Ballhorn Lab
Department of Biology
Portland State University

