

May 10, 2020

Regional Forester
Attn: Reviewing Officer
Pacific Northwest Regional Office
Attn: 1507 Objections
P.O. Box 3623
Portland, OR 97208

Dear Reviewing Officer:

I am writing this letter to express concerns on the proposed steamrolling of the proposal to initiate an environmental assessment (EA) process for the Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project within Mount St. Helens National Volcanic Monument (Monument), in Skamania County, Washington. I am a retired Corps Engineers civil engineer/geologist. I worked on the SRS. I also worked on the Gifford Pinchot National Forest (GPNF) for ten years as a geologist from 1975 through 1983 so I am familiar with history of Mt St Helens before, during and after the eruption. My concerns are listed below.

Public Trust Lands. The Monument was established to preserve the unique landscape that was created by the eruption of Mt St Helens. Research was a primary purpose and to alter the Pumice Plain with little discussion on impacts, violates the public trust given to the US Forest Service when the Monument was established. The research is ongoing and is not complete. The public needs to hear from the researchers and their discussion on the impacts so they can make an informed decision. A fast track environmental assessment (EA) process for the Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project will not provide adequate information for the decision making process and violates public trust in establishing and preserving the Monument.

Minimum Risks. There is concern for potential impacts to downstream communities with failure or blockage of the tunnel but that appears to be a low probability. It would require an abnormal series of events and there would be a window of several months to prevent downstream impacts. Catastrophic breaching of the lake is unlikely. Geologic, Geomorphic and Hydrologic Context of the Spirit Lake Outlet (Grant et al. 2017).

Unacceptable Consequences. GPNF must evaluate alternatives that ensure downstream public safety but sustain the research, recreation and environment of the Monument as scoped in its creation. The proposed EA process does not and GPNF is ignoring their public trust responsibility.

Impacts to Streams. The proposed road crosses five permanent and ten intermittent streams on the recently formed Pumice Plain. The Pumice Plain is an evolving, dynamic and unique geologic landform. Disturbing the Pumice Plain's delicate environmental balance especially at the stream crossings will lead to accelerated erosion and deposition in the Monument. This is unacceptable. The newly formed streams and watersheds are unique and have yet to reach a natural balance within the Pumice Plain. Therefore, having permanent stream crossings is in doubt. A permanent road on the Pumice Plain will increase the stormwater runoff on the plain and accelerate plain erosion.

The GPNF tried to maintain a road (N92) along the Muddy River in the late 1970s but finally abandoned the road after several costly reconstruction projects because the river was constantly forming a new channel. These reconstruction projects occurred before the eruption of Mt St Helens. The Muddy River floodplain is pyroclastic. The Pumice Plain and Muddy River roads are in similar geologic settings, therefore maintaining a road on the Pumice Plain is a high risk and may lead to unacceptable plain impacts.

Impact to Recreation. The proposed project will affect hiking, birding, biking and hunting. Trails in the vicinity of the project area will surely be closed including the trails on Windy Ridge, the proposed staging area for the project, the Plains of Abraham a popular mountain biking and hiking trail, and the Truman Trail. The Truman trail will become a gravel access road, no longer resembling a hiking trail.

Invasive Species. Introduction of unwanted invasive species is a major concern with a project of this nature. The New Zealand Mud Snail, an invasive species, has been introduced to the Spirit Lake system and it is feared that this proposed work would allow for further dispersal downstream in the Toutle River system to pose a potential ecological disaster.

Thank you very much for your time and consideration.

Regards,

Albert O'Connor

Albert (Al) O'Connor



Conservationist, Fisher & Hunter

