

Project: Spirit Lake Tunnel Intake Gate REplacement and Geotechnical Drilling Project
Project Manager: Chris Strebig
Location: Mount St. Helens National Volcanic Monument, Gifford Pinchot National Forest

Lead objector: Alex Wachter



A handwritten signature in cursive script, appearing to read 'Alex Wachter'.

Co-objectors: Katey Queen, Isabel Rodriguez, Camilo Acosta

Dear Forest Project Manager,

I, along with my fellow undergraduate colleagues, would like to file an objection to the April 7th 2020 NOPA regarding the Spirit Lake Tunnel Intake Gate replacement and Geotechnical Drilling Project. I am a graduating senior at the University of Washington Bothell, where I have had the once-in-a-lifetime opportunity to conduct plant ecological research at the Mount St. Helens National Monument. Under the mentorship of Dr. Cynthia Chang, I have participated in the long-term study of plant communities in the Class 1 research area within the Pumice Plains. Out of my entire time as an undergraduate, my involvement and experiences gained from my brief window of conducting research and engaging with the scientific community have been the most transformative and impactful to the development of my career as a future ecologist. One of the major goals I've had in this lab is to leave future undergraduates with the means of being successful in continuing our research for years to come. This has become drastically harder with the current health-crises at hand, and I worry our efforts of maintaining a viable research environment will become impossible during and after this drilling project.

While it is understood that it is important to maintain the water-levels of spirit lake to not exceed the dam for the safety of communities downstream, there has not been enough compelling evidence of this being an imminent threat requiring immediate action. While there are many in-depth assessments of the projected damages to ecosystems buffering the Truman trail and along the drilling/staging sites, there is no specific data on the imminence of a threat, or consideration of flow alteration downstream out of the bounds of the class 1 research zone. Mount Saint Helens is a unique environment that allows for research of all academic levels that could not take place without its eruption and congressional protection 40 years ago.

An ecological assessment was conducted and found no threat to endangered or sensitive species in the area. However, that does not take into consideration that it is not the species populations themselves that are at risk, but rather the fragile network that has been developing undisturbed for the last 40 years. Introduction of native and non-native species will have a cascading effect on the community composition, skewing the results of long-term research studies. I request that a full environmental impact statement be made, as there are unanswered questions about vectors of oil/diesel pollution from equipment, introduction of non-native flora and fauna, and impacts on plant community compositions opposed to solely rare or endangered species.

The proposed drilling and staging site will also negatively impact the novel UWB insect study sites on Spirit Lake's shore. Study sites that are monitoring insect biodiversity trends as well as exotic pest presence. This data is vital to understand insect community development in this successional ecosystem during global insect decline. As mentioned before, the ecological assessment found no threat to rare insect species, but does not take into account the likely introduction of pest insect species. The development of this young ecosystem is already hindered by small populations of pest insects, and further introductions would cause further damage and impede recovery of native flora. For these reasons, we request that a complete Environmental Impact Statement with more regard to entomology be released before any action of this proposal be taken.

As stated yourself, protected research of successional processes is inherent to the original purposes of the Monument's congressional formation. We highly encourage alternative action to be considered from developing the Truman trail, as it will cause vectors of unknown plant and insect species that will alter the course of a 40 year natural process of seed dispersal and establishment on the pumice plains. An alternative route via Johnston Ridge or Duck bay, while may be more visually disturbing to the public, would ultimately be the best option for the original purpose of the historical monument: preserving the integrity of the current and future research projects. For all the reasons stated above, we also request a public objection resolution meeting be held.

Thank you for your consideration,
Alex Wachter, Katey Queen, Isabel Rodriguez, Camilo Acosta