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November 10, 2024

Kelsey Jolley
Spirit Lake NEPA Coordinator
Gifford Pinchot National Forest
987 McClellan Road
Vancouver, WA 98661

letter submitted electronically at: www.fs.usda.gov/project/?project=66482

Re: Spirit Lake Outflow Safety Improvement Project Scoping Comments

Dear Ms. Jolley,

The Vancouver Audubon Society is a non-profit chapter of the National Audubon Society. For 50 years, we have worked to protect birds and the places they need using science, advocacy, education, and on-the-ground conservation. By "bending the bird curve," we are working to help halt, and ultimately reverse, the decline of birds across the Americas. Our members live in Clark, Skamania and Klickitat counties.

Vancouver Audubon offers guided birding field trips at Mount St. Helens and our members also bird there individually on private field trips. Birding locations include the Boundary Trail, Johnston Ridge Observatory, Pumice Plain (Truman, Willow Springs Connector and Loowit Trails) and Windy Ridge Viewpoint. In addition, some of our members conduct research on the Pumice Plain and report unusual bird sightings.

We urge that all engineering options be evaluated holistically regarding how well they comply with the management direction of the Mount St. Helens National Volcanic Monument Act (Public Law 97-243):

“Sec. 4 (b)(1) The Secretary shall manage the Monument to protect the geologic, ecologic, and cultural resources, in accordance with the provisions of this Act allowing geologic forces and ecological succession to continue substantially unimpeded.

Sec. 4(c) The Secretary shall permit the full use of the Monument for scientific study and research...

Sec. 4(e)(1) The Secretary shall provide for recreational use of the Monument and shall provide recreational and interpretive facilities (including trails and campgrounds) for the use of the public...”

These sections should be seen as screens to filter the engineering options to find the one that meets the public safety needs while least impacting the other provisions of the Monument Act. This includes protecting the integrity of the Class I Research Area specifically dedicated to research.

We urge that the engineering options be evaluated against the current experiential values of Mount St. Helens for visitors including the aesthetics of views of the heart of the blast zone and the sense of the wildness of the landscape that visitors experience while they are in it. For example, evaluate how the experience of hiking the Boundary Trail east from the Johnston Ridge Observatory will change if the trail is converted to a road or if a road parallels the trail.

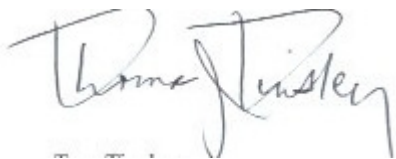
We urge that the engineering options be evaluated not only for the physical risk of sediment mobilization and flooding downstream, but also for the geologic risks of another volcanic eruption. Since 1980, Mount St. Helens has been intermittently active. Geologists view these periods of activity as eruptive episodes of one on-going eruption. Each option should be screened for its vulnerability to being destroyed during a period of volcanic activity.

We are opposed to Option A and Option D, which would cause substantial environmental impacts to the Pumice Plain and the Debris Avalanche, during both their construction and operation, without offering any environmental benefits. Option A's open channel would require substantial concrete bed reinforcement that likely would not achieve the goal of returning salmonids to Spirit Lake and Option D's buried pipe certainly would not be used by fish.

We think that further consideration should be given to Option B, fully rehabilitating the existing tunnel, and Option E, fully rehabilitating the existing tunnel and converting it to a pressure tunnel. These options would cause the least environmental impact to the values we consider a high priority at the Pumice Plain and the Debris Avalanche. If at some future time, you want to use the tunnel to draw down the level of Spirit Lake to facilitate a controlled breach of the Debris Avalanche to reestablish the North Fork Toutle River headwaters at Spirit Lake and restore salmonid access, it should undergo a separate NEPA analysis.

We look forward to reviewing the Draft Environmental Impact Statement when it is available.

Sincerely,

A handwritten signature in dark ink, appearing to read "Thomas J. Tinsley". The signature is fluid and cursive, with the first name "Thomas" and last name "Tinsley" clearly distinguishable.

Thomas J. Tinsley
President

