



Washington Native Plant Society

Appreciate, Conserve, and Study Our Native Flora

6310 NE 74th St., Ste. 215E, Seattle, Washington 98115
(206) 527-3210

Johanna Kovarik
Forest Supervisor
Gifford Pinchot National Forest
987 McClellan Road
Vancouver, WA 98661

November 13, 2024

Re: Spirit Lake Outflow Safety Improvement Project Scoping Comments

Dear Ms. Kovarik,

The Washington Native Plant Society (WNPS) is a non-profit organization with 12 local chapters and more than 2,500 members statewide. The mission of WNPS is to promote the appreciation and conservation of Washington's native plants and their habitats through study, education, and advocacy.

For over 45 years, WNPS members have prioritized conservation of intact native plants and plant habitats for their intrinsic ecologic function and value. WNPS promotes native plant appreciation with a variety of educational and conservation activities that are open to the public. These activities include studying plants in their native habitats and programs to support native plant conservation, research and stewardship.

WNPS has a long history of support for the Mount St. Helens National Volcanic Monument. We testified in support of the national monument's designation at Congressional hearings in 1982, participating on the science panel. The science panel's testimony convinced members of Congress that legislation was needed and led to overwhelming political support for passage of the Monument Act.

Since the national monument's designation, WNPS members have been among the scientists conducting long-term ecological research within the national monument, so we are particularly concerned about the impacts of the Spirit Lake Outflow Project on their life's work. Several of them already have been forced to abandon many years of data collection and analysis due to the current construction of the temporary road across the Pumice Plain.

As you evaluate the feasibility of the six engineering options for management of Spirit Lake, we urge you to adopt a holistic approach that considers how well each option meets the purposes and objectives of the national monument, including:

- protecting the integrity of long-term research
- conserving ecologically sensitive areas such as springs, wetlands and riparian areas
- allowing, as much as possible, natural ecological processes to occur substantially unimpeded

- maintaining the aesthetic (emotional, sensory, spiritual, mental) and environmental experiences of both recreational and educational visitors and indigenous peoples.

Furthermore, the six engineering options must be evaluated not only for the physical risk of sediment mobilization and flooding downstream, but also for the environmental risks, such as invasive species spread and damage to ecological integrity and connectivity across the current landscape.

At this time, the two engineering options that appear to best meet our concerns as well as the purpose and need for the project are Option B (Full Repair of the Existing Outlet Tunnel) and Option E (Convert Existing Tunnel to Pressure Tunnel) as the primary outlet for Spirit Lake with Lake Storage as the redundant capacity. These options would have the least landscape footprint on the Pumice Plain and the Debris Avalanche, thus least impacting the integrity of long-term research, the evolution of natural ecological processes and the current aesthetic visitor experiences.

These options also would not require support infrastructure, such as buildings, fuel depots and equipment yards, to be located and maintained on the Pumice Plain or Debris Avalanche since a more suitable location would be at the tunnel outlet where power supply and year round paved highway (SR 504) access already exist.

This project should commit that any access roads needed to maintain the preferred alternative for the Spirit Lake outlet should be designed only for the intended management purpose as service roads and not with the intent that they would become public roads for recreation access in the future. Roads are a slippery slope since their existence creates demands for public use that are not consistent with the current management plan.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Gail Sklar".

Gail Sklar
President