



1975 **50th** 2025
Anniversary

**P.O. Box 1966
Vancouver, WA 98668-1966**

October 26, 2025

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

letter submitted electronically at <https://www.fs.usda.gov/r06/giffordpinchot/projects/66482>

Re: Spirit Lake Outflow Safety Improvement Project Draft Environmental Impact Statement (DEIS)

Dear Ms. Kovarik:

The Vancouver Audubon Society is a non-profit chapter of the National Audubon Society with members in Clark, Skamania and Klickitat counties in Washington state. 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.

Vancouver Audubon offers guided birding field trips in the Mount St. Helens National Volcanic Monument and our members also bird there individually on private field trips. Birding locations within the project area 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 are scientists who conduct research on the Pumice Plain and report their bird sightings.

Bird Conservation

We support the use of the proposed Nesting Bird Survey and Avoidance Plan as part of the Project Design Criteria (DEIS, p. 63) to monitor the effects of the selected alternative on birds and to avoid impacts during nesting season, including disturbance and direct impacts to bird nests.

Vancouver Audubon is particularly interested in the relationship of birds to the Mount St. Helens blast zone. Birds like the horned lark and rock wren, not otherwise native to the Cascades Mountains, were among the first to colonize the Pumice Plain because they are adapted to the open, rocky landscape. As plants like Sitka willow and red alder appeared on the landscape and created oases of shrubs and trees, new species of birds that depend on these habitats, including warblers, sparrows and flycatchers, have

appeared. The woody plants now form deciduous woodlands, attracting more neotropical migrants, a bird group in serious decline in the western hemisphere. The interactions of neotropical birds and insects on the Pumice Plain have been a research subject. Meanwhile, a flock of Canada geese found its way to Spirit Lake; now they return to nest on the shoreline each spring. Within this project area, according to the eBird database, 72 bird species have been reported from the Pumice Plain, 72 species have been reported from the Windy Ridge Viewpoint, 86 species have been reported from the Boundary Trail-East and 50 species have been reported from Spirit Lake and its shoreline.

Preferred Alternative 2 + Alternative 9

Vancouver Audubon supports Preferred Alternative 2 – Full Repair of the Existing Tunnel paired with Alternative 9 – Lake Storage because it would best meet the project goal to reduce long-term outflow operation and maintenance costs. Since the tunnel already exists, this alternative should have the shortest construction duration once funded and it should be the most efficient in implementation since it will be less weather-dependent and less susceptible to volcanic activity than above-ground projects.

We request that you evaluate the 2018 UTV (utility terrain vehicle) Route to Duck Bay as a permanent alternative to construction of the Truman Trail Access Road across the Pumice Plain to the barge-landing site. The UTV Route has been an access route to the Spirit Lake shore that the Forest Service has been using since 2018, including while a temporary road has been built for tunnel gate repair. Once the temporary road is removed in 2027, the Forest Service will need to continue using the UTV route to Duck Bay to access Spirit Lake by boat for tunnel gate monitoring and management until a new, permanent road is funded and constructed. In addition, the UTV Route already has undergone National Environmental Policy Act review and received support from scientists and the public.

We oppose a new Truman Trail Access Road for all alternatives because it would be yet another ground-disturbing and habitat-disturbing activity on the Pumice Plain. A new road would be 16 feet wide and would have 21 crossings of creeks, drainages and wetlands, requiring permanent culverts, bridges and armored roadway embankments that are resistant to washout. It would require snow removal in winter to maintain year round access. According to the DEIS (pp. 242-243), a new Truman Trail Road would overlap with 18 research sites and affect an additional 19 research sites within 250 meters of the right-of-way.

We oppose the proposed alternate Shoreline Access Road in all alternatives because it would create another new footprint 16 feet wide through wetlands, riparian vegetation and open ground with areas of high water tables, potentially impacting nesting and migrating birds. We similarly oppose the proposed alternate Johnston Ridge Access Road due to its landscape and habitat impacts.

Preferred Alternative 7 + Preferred Alternative 5

Vancouver Audubon opposes Preferred Alternative 7 – Phased Natural Habitat Channel paired with Alternative 5 – New Pressure Tunnel plus partial repair of existing tunnel as the redundant outlet. This alternative would build an engineered channel to reconnect Spirit Lake to the Toutle River over a span of 20 years or more, depending on funding, requiring continued use of heavy equipment and habitat and construction disturbance and impacts. Wetlands, lakes and ponds, often with emergent and riparian vegetation, would be replaced with a flowing stream. Bird use of the landscape would be impacted by the continual disturbance and alteration of habitats.

The natural habitat channel would require a permanent Truman Trail Road across the Pumice Plain as well as temporary roads to facilitate heavy construction equipment to initiate the channel and haul

excavated material to a storage site. This Truman Trail Road would need to be built to a higher standard in this alternative to support heavy construction equipment rather than just pickup trucks.

The natural habitat channel and temporary road would overlap with an additional 5 research sites, permanently destroying or making them inaccessible. An additional 7 research sites are within 250 meters of the road and/or channel. These impacts are in addition to those sites affected by the Truman Trail Road, giving engineered works significant primacy over research in a Class I Research Area.

In our scoping comments, Vancouver Audubon urged that all alternatives be screened against the management direction of the Mount St. Helens National Volcanic Monument Act (Public Law 97-243) to find the one that meets the public safety needs while least impacting the other provisions of the act. We were not able to find that analysis in the DEIS.

We do not believe that Preferred Alternative 7 complies with the legislated management direction, particularly 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.”

The Mount St. Helens National Volcanic Monument is not about “recovery” to some future forested state that resembles what was here prior to May 18, 1980, including the Toutle River flowing out of Spirit Lake. Dr. Jerry Franklin says, “It is about its natural evolution, its rich array of organisms and processes, and its contributions to our ecological understanding.” In addition, Dr. Fred Swanson, an authority on the ecology of Mount St. Helens, has said: “The notion of ‘recovery’ may be relevant to specific components of an ecosystem in specific parts of the Mount St. Helens landscape....But some parts of the landscape are new places on the face of the Earth—the crater, new lakes, and the debris avalanche deposit, which raised the land surface up to 600 feet in places. ‘Restoration’ and ‘recovery’ are not taking place there—these are wholly new ecological systems.”

(<https://www.terrain.org/2012/currents/dirty-words-on-mount-st-helens/>)

Preferred Alternative 7 seeks to tinker with the natural evolution and new ecological systems of Mount St. Helens, including, indirectly, birds using the evolving landscapes, to achieve human-desired and human-engineered outcomes. The natural habitat channel, since it is not a flood control measure, also does not fall under the Monument Act exemption in Sec. 4 (b)(3) that “Nothing in this Act shall prohibit the Secretary from undertaking or permitting those measures within the Monument reasonably necessary to ensure public safety and prevent loss of life and property.”

Lowered Level of Spirit Lake

Lake storage in both preferred alternatives would result in lowering the level of Spirit Lake by up to 40 feet, exposing more shoreline and shrinking the volume, depth and area of the lake. This would be a major impact to the lake’s ecosystem, yet it received only a few sentences in the discussion of environmental consequences in Chapter 3.13.2, with the concluding statement (DEIS, p. 306): “This would be a permanent, minor [*emphasis added*] impact that could also be beneficial to wetlands and riparian areas. The final acres of altered shoreline habitat is currently unknown for this alternative.” This analysis is totally inadequate since it never considers the impacts to the lake itself as an aquatic ecosystem.

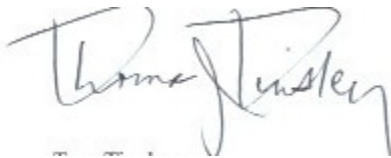
We request a fuller analysis of the impact of a lower lake level on the Spirit Lake aquatic ecosystem. Please address how lowering the level of Spirit Lake by 40 feet will affect the lake’s biological productivity, nutrient cycling and chemistry. In *Ecological Responses at Mount St. Helens: Revisited*

35 years after the 1980 Eruption, (Charles M. Crisafulli and Virginia H. Dale, eds., New York: Springer, 2018, pp.71-95), Dr. James Gawel reported that Spirit Lake was changed biologically, chemically, and physically by the 1980 eruption of Mount St. Helens and the concurrent landslide that essentially buried the old lake and created a new one in its place. Recent changes to the surrounding watershed, spurred by ever-increasing regrowth of terrestrial vegetation, continue to alter the biogeochemistry of Spirit Lake. Gawel spent over a decade developing a hydrologic and nutrient model for the lake and working to describe the ecological role of the floating log mat in Spirit Lake. He reported that his limnological research has largely focused on the recovery of the open water ecosystem, with an emphasis on changes in primary productivity and lake chemistry. He found that Spirit Lake remains nitrogen-limited, likely as a result of the nitrogen depletion of source material, including ash and vegetation deposited in the lake basin.

The DEIS does not present any research or analysis to support the assumption that anadromous fish would return to Spirit Lake if they had the access proposed with the natural habitat channel. Would Spirit Lake in its proposed shrunken state have the necessary chemistry, nutrients and productivity to attract and support salmon and steelhead?

We look forward to seeing the issues, concerns and requests contained in these comments addressed in future project documents.

Sincerely,

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

Thomas Tinsley
President