



Washington Trails Association

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October 30, 2025

Kelsey Jolley
Spirit Lake NEPA Coordinator
987 McClellan Road
Vancouver, WA 98661

RE: Spirit Lake Outflow Safety Improvement Project

Dear Kelsey Jolley,

Washington Trails Association (WTA) appreciates the opportunity to comment on the Spirit Lake Outflow Safety Improvement Project Draft Environmental Impact Statement (DEIS). WTA has a more than 50-year legacy of engaging the hiking community. WTA enhances hiking experiences in Washington state by empowering a diverse and growing community of hikers to explore, steward and protect trails and public lands. WTA is the nation's largest state-based trail maintenance and hiking advocacy nonprofit organization, with more than 26,000 member households and an online community of more than 180,000. Each year more than 3,500 WTA volunteers perform over 130,000 hours of trail maintenance across the state. During the last year WTA volunteers have contributed over 2,000 hours of trail maintenance on trails managed by the Mount St. Helens National Volcanic Monument.

These many hours of volunteer labor reflect how important the trails on the Monument are to the public. The opportunity to hike across the pumice plain on a foot path and witness the landscape largely unaltered by human activity is a unique and powerful experience that draws people from across the region and the world. Consequently in weighing the importance of the various factors described in the DEIS we advocate for placing a high priority on the recreation resource, as did the Forest Management plan that categorizes the pumice plain as a semi-primitive, nonmotorized recreation area.

We understand that all the alternatives as written in the DEIS require permanent road access for operations in addition to initial implementation. All three road options being considered have major impacts to recreation directly and indirectly. The Johnston Ridge would likely have the most negative

impact from a recreation perspective while the other two options, the Shoreline Access road and the Truman Trail Access road options have less but also significant negative impacts to recreation.

We noted that the DEIS described impacts to recreation during periods of the road's use for implementation and periodic ongoing operations. However, we did not see an adequate analysis of the loss of the recreation resource because of the permanent obliteration of a trail in converting it to a road. The DEIS states "*The permanent access road would reduce the feeling of remoteness and the predominantly natural appearing landscape but would not prevent recreational use outside of necessary closures for maintenance activities.*" This statement doesn't accurately capture the magnitude of the impact when a trail is lost in the conversion to a road. In other parts of the Gifford Pinchot National Forest the loss of some trail mileage to a road conversion could be substituted with similar experiences in another location but in this instance the unique and iconic nature of the pumice plain has no substitutes. The multi-criteria decision analysis indicates the impact as a Forest Plan conflict and offers the remedy of a Forest Plan amendment. We would like to see the final EIS offer a more substantial remedy.

Setting aside the access road issue for a moment, we believe that the best option to address the needs of this project while protecting the unique recreation values on the Monument is the full repair of the existing tunnel (Alternative 2) This approach is the most cost-effective because it utilizes the existing tunnel infrastructure, avoiding the need for entirely new construction that would impact hiking on the pumice plain. Once funding is secured, the anticipated construction duration is relatively short, at 3–4 years compared to other options being considered. Since the repair work occurs inside the tunnel, it is less affected by weather conditions and is more resilient to natural and volcanic hazards. This option also results in the least sediment mobilization into the Toutle River, offers greater adaptability to climate change, and preserves environmental integrity compared to more invasive alternatives.

However, Alternative 2 as written still entails using the Truman Trail, where a temporary road was built to facilitate drilling equipment to perform geotechnical assessments, as a permanent access road for tunnel construction and ongoing operations. Of the three options for ongoing road access - it is the least intrusive as the damage has already been done to the trail and nearby research sites.

The permanent conversion of a trail to a road where no substitutes exist is more than a reduction in the sense of remoteness but rather a loss of an entire experience. The pumice plain hosts many research plots that are important to learning about the natural succession ecology, but the Monument Act also calls for the provision of recreational access. Given the high value of the recreation resource faced with a permanent change we request that the current temporary road built over top the Truman Trail be restored to a hiking trail as originally planned. The Forest Service has successfully used the 2018 UTV Route and boat access method for tunnel maintenance before and this lower-impact alternative should be evaluated in the DEIS to avoid unnecessary environmental disturbance and cost. Although Duck Bay has drawbacks as a moorage, in our view the value of the recreation experience on the Truman Trail outweighs those shortcomings. If this cannot occur due to the

technical constraints of the proposed action, we believe that the Truman Trail should be rerouted to maintain the existing non-motorized recreation experience.

Thank you for the opportunity to participate in the decision making process. We appreciate the energy and resources that have been invested in making a thoughtful and informed decision on this important matter. Please contact our organization if you have any questions or would like to further clarify our input.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Ojerio", with a horizontal line extending to the right.

Ryan Ojerio | Southwest Washington Regional Manager