



Mount St. Helens Institute
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October 30, 2025

Kelsey Jolley
Spirit Lake NEPA Coordinator
United States Forest Service
987 McClellan Road
Vancouver, WA 98661

Subject: Draft Environmental Impact Statement and Preferred Options for Spirit Lake Outflow Safety Improvement Project

Dear Ms. Jolley,

The Mount St. Helens Institute (MSHI) is commenting in response to the Draft Environmental Impact Statement of the Spirit Lake Tunnel Outflow Safety Improvement Project. Our partnership with the Gifford Pinchot National Forest is valuable in our mission-centered work. Our two organizations work closely to further education, stewardship, and science in the Monument. Our intent in commenting is to share our perspective on a complex issue with implications for our work, our communities, and our supporters. We agree that work is necessary to provide for the long-term safety of citizens living downstream of Spirit Lake. MSHI would like to see the potential impacts of the following areas addressed in the final plan: partner operations, educational opportunities, visitors and community members, and scientific research.

MSHI PARTNER OPERATIONS

The project will have significant impacts on partner operations that depend on consistent access to and the integrity of the Monument's landscapes. The Mount St. Helens Institute operates a variety of educational programs that will be directly affected by this project in both the short- and long-term.

Concerns:

- Short-term:
 - MSHI operates, under permit, a variety of programs impacted by the project
 - Guided Adventures that use the Truman and other trails affected by closures
 - Visual and noise impact of construction on participants
 - Windy Ridge and trail access for MSHI program planning and development
 - Impacts of housing, staging, sediment, and spoils sites outside of the project evaluation area
- Long-term
 - Spoils storage locations that impact participant and visitor experience

Suggestions for mitigation:

[Advancing understanding and stewardship of the Earth through science, education and exploration of volcanic landscapes.](#)

- Provide predictable, consistent partner access to the Monument trails
- Minimize construction impacts in high-value educational and interpretive areas to the greatest extent practicable
- Provide clear timelines for access restrictions, minimize construction impacts on high-value educational areas whenever possible, and commit to comprehensive restoration of all disturbed sites with specific success criteria and adequate funding
- Recognize impacts of activities outside the initial evaluation area. Activities including construction housing, staging, sediment release, and placement of spoils storage and disposal areas could have significant effects on partner activities, the visitor experience, individuals' health and safety, scientific research, and ecological integrity at Mount St. Helens. Ensure that these activities are planned and executed in conjunction with affected partners and stakeholders.

EDUCATIONAL OPPORTUNITIES

Construction activities will create unavoidable visual and auditory disruptions that may detract from the reflective and immersive educational experiences that MSHI participants seek.

Concerns:

- Short-term (during construction)
 - In-monument education programs around Windy Ridge, the Pumice Plain, and the Boundary Trail will be visually and audibly impacted by construction work
- Long-Term:
 - Residents and visitors may not understand the risks and benefits of the project without continued education

Suggestions for mitigation:

- Before and during construction: Garner support for additional interpretive signage, additional human resources to explain what is going on (east side rangers), and/or partner funding to engage impacted communities
- Before construction: provide funding for partners to develop educational curriculum and volunteer resources that support extended community and student engagement about the project
- During construction: provide funding for partners to implement extended community and student education about the project
- Before construction: Ensure all communities around the volcano, including north side (Lewis County: Morton, Randle, Packwood), south side (Skamania and Clark Counties: Cougar, Carson, Northwoods), and east side (Cowlitz County: Castle Rock, Toledo, Toutle, and Longview/Kelso) communities have had sufficient engagement to have a voice in the process, as well as opportunities to learn about potential impacts.

- During construction: Broad community engagement to help residents on all sides of the volcano to understand risks and benefits
- Post construction: Maintain interpretive signage and infrastructure to ensure residents continue to understand risks and benefits

VISITOR AND COMMUNITY IMPACTS

The Mount St. Helens Institute recognizes that any alternative selected will create both challenges and opportunities for local communities and the Monument.

Concerns:

- Short-term impacts
 - Noise, road closures, and trail access (Truman, Harry's Ridge) issues during construction
 - Limited access to the area, including Harry's Ridge, the Pumice Plain, and Windy Ridge, for visitors and local residents
 - Negative impact on the local economy due to continuing decreased visitation
 - Effects on local community infrastructure, including increased construction traffic, road maintenance needs, and demands on and challenges for emergency services
 - Visual impact on visitors and viewsheds in areas adjacent to but outside the formal project boundary
- Long-term impacts
 - Years of construction on the east side, including major outlet tunnel work, may decrease the number of visitors traveling to the east side through rural communities.
 - Heavy construction equipment has already damaged the deteriorating infrastructure on Forest Roads 25 and 99. Future construction on the tunnel will continue to degrade roads.

Suggestions for mitigation:

- Secure mitigation funding that addresses both short and long-term economic impacts from reduced visitation. This could include:
 - Funding for USFS road and parking area maintenance
 - Funding for USFS or partners to improve and restore recreational infrastructure such as, but not limited to, trails, signage, toilets, fencing, stairs/steps, and vegetation management.
- Regard community support and infrastructure investment not as ancillary costs, but as integral components of responsible, sustainable project implementation.
- Limit trail closures as much as possible

SCIENTIFIC RESEARCH Any work in this landscape must respect and protect the scientific research and ecological integrity that make Mount St. Helens one of the most studied volcanic landscapes in the world.

Concerns:

- Short-term:
 - Wildlife movement corridors and habitats are displaced by staging areas and access roads
 - Pumice Plain stream and wetland disturbance from access roads and vehicular traffic
 - Lack of collaboration with scientists to and maintain long-term ecological research plots within and outside the project area
 - Staging areas and new access routes could introduce invasive species which would significantly alter ecological processes
- Long-term:
 - Project activities may disrupt sensitive habitats, and long-term ecological research plots that are fundamental to understanding volcanic ecosystem recovery
 - Previous work in the area has already resulted in irreversible damage to long-term research sites

Suggestions for mitigation:

- Recognize that the scientific and educational legacy of Mount St. Helens represents an irreplaceable national resource; protecting its research integrity constitutes an investment in long-term societal knowledge
- Collaborate closely with research partners to maintain, and protect, and, where necessary, relocate long-term research plots with minimal data loss.
- Integrate long-term ecological monitoring and enact strict invasive species prevention into all phases of project planning, implementation, and post-project followup.
- Funding for scientific work that provides ongoing funding for new or continued research projects at MSH, both through the Pacific Northwest Research Station and through university research.

Additionally, MSHI recognizes that the DEIS was not intended to be an analysis of the financial implications of the project. However, given the financial constraints of the Forest Service and the historical challenges around maintaining infrastructure, MSHI suggests an analysis of the long-term costs to the Forest Service for each proposed option. This analysis should include



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proposed funding strategies for long-term maintenance of the infrastructure in addition to the initial cost of the project.

As a long-standing partner to the USFS, we appreciate the opportunity to comment and hope to provide an important perspective on this complex issue. We understand the challenging, nuanced, and multifaceted nature of the problem. We urge consideration and integration of the multiple stakeholders affected by the work.

Sincerely,

Abi Groskopf
Co-Executive Director

Alyssa Hoyt
Co-Executive Director

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