Data Submitted (UTC 11): 5/22/2020 4:02:57 PM
First name: Nina
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Organization:
Title:
Comments: 18 May 2020
Dear Gifford Pinchot Forest Supervisor and Monument Manager,
I am writing to you today, the 40th anniversary of the eruption of Mount St. Helens, to submit a formal comment objecting to Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project proposed action.
I have worked on Mount St. Helens as part of the ecological field crew, on-and-off for the past four years. I have spent most of my time on the Pumice Plain, assisting on projects that investigate the bird, small mammal, amphibian, and fish communities that have recolonized this fragile ecosystem. Through my own personal observations and the wide breadth of past and present scientific research conducted on the Pumice Plain, I have come to learn the importance of this ecosystem and the need to protect it.
I do not agree with the findings of the Environmental Assessment and I oppose the proposed access route. The proposed route of this road will bisect numerous terrestrial and aquatic research sites, some of which were established nearly 40 years ago and are part of a long-term network of ecological studies. The damage to these sites would be an unmeasurable loss to the ongoing understanding of long-term ecological responses to volcanically disturbed systems. Moreover, the aquatic research sites, established only within the last few years, study the five newest watersheds on the planet. The watersheds of the streams running from the glaciers of the crater to Spirit Lake are extremely fragile and highly susceptible to damage. If road construction were to continue as proposed in the draft decision, it would likely cause sediment deposition, alter algal production, harm the macroinvertebrate community, impact downstream systems, and damage the surrounding riparian vegetation. These irreversible effects will change the way these novel watersheds continue to develop.
Additionally, the construction of this road will cause damage to the wetland habitats that the border Spirit Lake and expand south. While the proposal fails to acknowledge these wetlands, this area meets the federal definition of a wetland: hydric soils, hydrophytic vegetation, and wetland hydrology. Thus, if the route proposed were to be constructed, The Forest Service and the Army Corps of Engineers would be in violation of the Clean Water Act.
The building of this road will likely introduce new invasive and facilitate the spread of existing invasive species. New Zealand Mud Snails, which already occur in Spirit Lake, are recognized as an invasive species by the USDA and a prohibited species by the state of Washington. The movement of material and equipment associated with the road construction poses the risk of spreading this species to other aquatic habitats on the Pumice Plain including the aforementioned streams and wetlands.
I ask that the Forest Service and Army Corps of Engineers reconsider the proposed alternatives in the Notice of Proposed Action. Specifically, Drilling 3: Helicopter, Drilling 2: Ground-Based Johnston Ridge Observatory Route, and Gate Replacement 3: Duck Bay Utility-Terrain Vehicle Access Route, which would limit human-made impacts and make use of the preexisting UTV road.
I do not think the Environmental Assessment is accurate in it's assessment of the potential damage to the Pumice Plain. I am requesting that the Forest Service and Army Corps of Engineers conduct a more detailed Environmental Impact Statement to better understand the potential effects of the construction of this proposed route. I also request that you facilitate an Objection Resolution Meeting, in which I would appreciate participating.
Thank you,
Nina Ferrari

(PDF Version Attached)