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Comments: Although the Mt. St. Helen's Pumice Plain poses some potential risks to downstream communities, the Army Corps of Engineers and Forest Service are not characterizing those risks in a fair manner. Principally, a very unusual sequence of events would be required in order to cause negative downstream impacts and even in that case, many months would still have to pass before the risk would be realized, months in which responses could be formulated that would mitigate effects before they affected downstream communities. In particular, unlike situations involving a dam that can burst, the failure or blockage of the existing tunnel would not result in the immediate release of Spirit Lake because under normal circumstances it would take the lake many months to fill to the point of breaking through the block. This time lag would allow for preventive measures to protect the downstream communities. For more detail, see Geologic, Geomorphic and Hydrologic Context of the Spirit Lake Outlet (Grant et al. 2017).

As the daughter of a scientist and science teacher, I know and value that one of the primary purposes of the monument is research, of world-class importance because of the unique nature of the Pumice Plain. In addition, the research results will demonstrate that investment becomes more valuable because it will demonstrate that the GPNF can ensure public safety without decimating research. We, the American public, need to urge the GPNF to explore the already known alternatives that mitigate and address potential downstream risks while having minimal effects on research, recreation, and the environment.

The public right to participate in the decision-making process was truncated when the notice of proposed action was posted on December 17, which limited public comment window to the vacation period when agency staff are unavailable. Moreover, the agency has chosen not to include a public comment period after the final EA is published, which prevents meaningful public input and could undermine the public participation regulations outlined by the CEQ, if any changes are made to the final EA.

The road being proposed poses serious risks of damage to stream beds, crossing 5 permanent streams and 10 seasonal streams on the highly dynamic Pumice Plain. It risks eroding the soil and creating sediment in the streams that will subsequently pass into Spirit Lake. Affected will be 5 separate watersheds generated after the eruption that comprise a complex of newborn watersheds unique in the entire world. The road would receive 1,980 passenger vehicle passes, 84 tractor-trailer passes, 464 single-unit truck passes, and 6-10 drill rigs passes per season. The sediment that they would churn up would damage the habitat and perhaps the life of aquatic insects and fish, likely causing them to move downstream; it would increase turbidity and damage benthic habitat. Each of these stream crossings will likely wash out every year and then require re-excavation and rebuilding, causing further damage to habitats and species.

The proposed work on the Pumice Plain will impact hiking, birding, biking, hunting, and scenic views. Its disturbance will be visible from many locations including Harry's Ridge, Windy Ridge, Johnston Ridge, and the Mount Margaret Backcountry. As a trained linguist who has published on the effect of sound on living organisms, I know that the sonic drubbing caused by drilling and construction sounds will destroy the quiet of nature and impact all humans and animal species in the area. In addition, the proposal of Windy Ridge as a staging zone will cause the closure of it and its associated trails for the duration of the project. This would include the popular mountain biking and hiking trail, the Plains of Abraham. The Truman Trail will also be closed for the duration and will no longer be a hiking trail but a gravel road.

The proposed work will impose serious environmental damage, beginning with the sounds from drilling that will be heard for five long years throughout the region and destroy the peace and harm nearby animal populations. The human impacts on the land that will occur during this window have not been included in the plans. The proposed road's structure will permanently change the landscape, perhaps profoundly if it is classified for use in long-term maintenance. The environmental impacts are largely unknown because the GPNF has failed to do an Environmental Impact Statement (EIS), which allows the scope of potential impacts to be ignored.

In this region, the Introduction of invasive species is a critical concern, including the further dispersal downstream in the Toutle River system of the New Zealand Mud Snail, an invasive species that has been introduced to the

Spirit Lake system, risking a potential ecological disaster. Other unknown species could be introduced to the system by barges, drilling machinery, and other infrastructure brought in for this work. Moreover, the plans call for the road to be constructed from gravel and asphalt, which have the potential to bring in foreign unknowns. Native species also stand to be harmed by the planned work. Local biologists and researchers believe that the existing population of Rainbow Trout in Spirit Lake is, in fact, of wild winter Steelhead lineage, which would require the Forest Service to take additional steps in ensuring the survival of the species. This possibility is being explored because the North Fork Toutle River avulsed at least ten times from 1980 through 2017, which would have allowed the population to connect with the lake. Proof of this hypothesis by DNA tests would require measures to address the environmental impacts of the project on this species.

If implemented as proposed, this project will affect the wild landscape forever. Therefore a full review process and full public involvement are fundamental to avoiding permanent damage to this land, which belongs to all Americans, and the species that it sustains and to the internationally-important research being conducted on this landscape newly created by an unusual natural process, the eruption of a volcano.