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Organization:

Title:

Comments: To: Regional Forester Reviewing Officer, Pacific Northwest Regional Office

Attn: 1570 Objections

Regarding creating the road between the Windy Ridge and the Drilling Project.

Project Appendix C: Summary of Public Comments:

Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling

Project Appendix C: Summary of Public Comments

from p.5 The enabling legislation Section 4(b)(1) states, "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 environmental assessment and subsequent finding of no significant impact documents that no significant adverse effects will occur to geologic, ecologic, or cultural resources from implementing the project and that the project will allow geologic forces and ecological succession to continue substantially unimpeded (*italics mine*).

My prior comments appear to have been completely disregarded. And in fact, the research on ecological succession will be irrevocably destroyed. Two research experiment plots will be destroyed, located at the Willow Springs, and just before the Clear Creek Springs areas.

These plots were established in 1981, based on collections made in 1980, just after the eruption. They have been studied since. Providing critical information on the processes of succession, upon which almost every ecological decision made within the forest service is based.

We pointed out: "the role of mycorrhizae has largely been studied using space-for-time substitution...However, that model has proved to be of limited use in understanding the complexities of landscape-scale recovery." The two experiments, undertaken since 1981-1982, show that the actual recovery pattern was far different than predicted using the simpler, older model (see Crisafulli and Dale, eds, *Ecological Responses....* Springer. p213). These experiments are of even greater value today, and we have current molecular sequence information underway. Based on the past and current data, a new suite of experiments with a new generation of investigators involved, is in preparation. Without these plots, there is probably no value in continuing these investigations, and a key suite of processes for understanding dynamics of succession, will be lost.

There is simply no substitute for long-term studies, especially for a succession that lasts centuries.

When we designed this study, we were assured that the site would be available unimpeded. If this project is approved as is, that promise is broken.

I ask for an Environmental Impact Statement to be prepared based on the fact that "the finding of no significant adverse" is inaccurate.

I further ask for an objection resolution meeting.