

Data Submitted (UTC 11): 5/18/2020 10:02:01 PM

First name: Roger

Last name: del Moral

Organization:

Title:

Comments: Re: Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project #57259

I am writing to object to the decision to build a road across the base of the Pumice Plain. Roads of any kind will encourage visitors with no authorization to enter sensitive research areas, travel across active study plots and compromise plots that have been followed for over 3 decades. The results to date of these studies have improved our understanding of primary succession and have fostered more informed restoration practices.

Early in my career, I was directly involved in several US Environmental Impact Statements concerning Nuclear Power Plants in northern and southern California, North Carolina and Connecticut. In each case, after we carefully evaluated the potential ecological impacts, we published a DRAFT statement, then carefully revised it in response to active input from citizens and various agencies. I do not see that suitable responses to legitimate comments have been made.

It does appear to me that the objective is to build an access road, and that there is no compelling argument that would either cause the road not to be built nor even to effect modifications that would limit damage to the heart of the Mount St. Helens research area. Rather, the flawed proposal is dismissive of objections and condescending in the extreme.

I fail to note a thoughtful analysis of the potential impacts to either terrestrial or aquatic habitats. There is no value placed on the cumulative value of the research enterprise. This research has provided the Monument with the best (not exaggerating here) and soundest input into the interpretive program of any National Park or Monument of which I am aware. In my own field, this research has informed and modified how ecosystem restoration has been undertaken. For example, the book 'Primary Succession and Ecological Restoration' (L. R. Walker and R. del Moral, 2003), explicitly showed how the lessons of primary succession as revealed by studies on Mount St. Helens have improved practical ecosystem restoration. This book, according to ResearchGate has been cited over 700 times, more than 99% of papers archived on this global site.

The research being done on Mount St. Helens is unique (a word I do not use lightly). Nowhere in the world, ever, and probably never again, has so much first-rate science been conducted in one large ecosystem by so many dedicated and accomplished scientists. Never have so many scientists been trained in such an exciting, meaningful habitat. The project, as constituted will seriously compromise future work in ways we cannot fully appreciate. One example: much of my work focused on the effects of distance and isolation as factors structuring vegetation composition. The introduction of the road will provide corridors for invasion of many species not able to reach these sites and thus alter the course of succession and the conclusions we might draw from continuing to observe natural processes.

I would think that at the very least, an EIS should be prepared so that, at the very least, we will have an idea of what stands to be lost by this project. I believe that one way to reach a solution would be to have an objection resolution meeting to explore alternatives to the access road.

Sincerely,

Roger del Moral, Ph. D.
Emeritus Professor of Biology
University of Washington

