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Organization: Cascade Volcanoes Great Old Broads for Wilderness

Title: Mrs

Comments: May 21, 2020

Regional Forester (Reviewing Officer)

Pacific Northwest Regional Office

PO Box 3623

Portland, Or. 97208-3623

Dear Regional Forester:

I am contacting you regarding the proposed Pumice Plain Road at Mount Saint Helens which is part of the project entitled "Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project #57259.

With this letter I object to the Environmental Assessment (EA), Finding of No Significant Impact (FONSI), and Draft Decision Notice (DN) dated April 2020 prepared by the Gifford Pinchot National Forest. I am submitting this objection electronically within 45 days of the publication of the legal notice in The Columbian.

I have previously submitted timely, specific written comments on the Notice of Proposed Action for Scoping and Comment Period for this project. My comments were received by the electronic system.

I am writing to formally object to the dismissal of a need for an EIS on the proposed Pumice Plain Road. I initially objected during the scoping process, and I do not feel that my scoping comments were addressed adequately; I am requesting that a comprehensive environmental review be completed in order to adequately study the impacts of the project on the environment.

Under NEPA, an agency must prepare an EIS if a proposed federal action could "significantly affect the quality of the human environment." The significant impact need not actually occur; it is sufficient to trigger the preparation of an EIS if a substantial question is raised "whether a project may have a significant effect on the environment." I brought up in my scoping comments that the proposed road would cross 5 permanent streams that make up 5 separate watersheds. Water quality would be impacted from sedimentation and soil erosion due to the building, maintaining, and using the road. These streams flow into Spirit Lake, and the stream crossings would, most likely, wash out at least once a year and need to be rebuilt annually. Furthermore, the sedimentation would disrupt resident insects and fish. These issues are not addressed completely in the current environmental assessment.

My concerns about the project included the flawed safety problems from the risk of Spirit Lake outflow failure. I support the Forest Service's efforts to protect downstream communities; however, there is a low potential risk for a catastrophic failure of the debris blockage. Downstream communities would not be affected without abnormal climate conditions. Again, this issue is not fairly described in the current environmental document.

One other issue that I brought up indicated a significant impact upon recreation in the area. The popular Truman Trail would be converted to a gravel road and potentially be closed to the public for 5 years. The visual disturbance from the project would be visible from Johnston Ridge, Windy Ridge, Harry's Ridge, Loowit Trail, and most of the Boundary Trail across Mt. Margaret. Furthermore, the access to these trails would be impacted during road construction and use. Recreational activities such as hiking, birding, and outdoor enjoyment would be substantially curtailed. These concerns of mine were not addressed in the Environmental Assessment and need further review.

The other concern of mine suggested the damage the potential road would disturb the natural processes of wildlife. Among these processes which includes noise, displacement, vegetation clearing, dust, as well as the potential for bringing in new vectors, including the New Zealand mud snails. These mollusks are almost impossible to eliminate once they are established. The likelihood that the protocols for safety from outside vectors could be maintained with 84 tractor-trailer passes, 464 single-unit truck passes, 1,980 passenger vehicle passes, and 6 - 10 drill rig passes per season is minimal. The opportunities for outside vectors being introduced as a result of this project poses too great of a risk.

I do not feel that the Forest Service researched Alternative C which would have much less impacts on the environment and recreation. The project, as it is described, has failed to consider the reasonable alternatives to the proposal. This road is not needed, and helicopters and barges could serve the purpose well.

I urge you to reconsider this project because the damages to the environment and recreation will be seen for many years after the road is constructed. Please keep me informed on the developments of this project.

Sincerely,

Laurie Kerr

Leader, Cascade-Volcanoes Broadband

Great Old Broads for Wilderness