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Organization:

Title:

Comments: May 22, 2020

To: Mount St. Helens National Volcanic Monument

From: Fred Swanson

Subject: Pumice Plain EA road decision

I write to express my deep disappointment with the decision to build a road across the Pumice Plain for Spirit Lake tunnel management. As I noted in earlier communications on this topic, I have been involved in geology and ecology research at Mount St. Helens since my first field visit with USGS colleagues May 28, 1980, and have tracked developments in the landscape and societal engagements there ever since. Over the past 40 years Mount St. Helens has become preeminent place for learning about volcanology and, especially, volcano ecology.

My most general concern is that in some quarters the Pumice Plain road issue has been portrayed as science vs. public safety, which does not have to be the case. Several other access options were given inadequate consideration and were dismissed earlier in this planning process; these would have not created the risks posed by the Pumice Plain road to long-term ecological research so widespread in the area to be impacted by that road. Public safety and the integrity of long-term research and the ecosystems of the Pumice Plain can be compatible.

Several more specific issues point out inadequacies of the EA and also the need to do an EIS for this project. A couple examples are:

- 1.The EA says wetlands are not present, but this is untrue and suggests other parts of the site analysis are incomplete. Extensive wetlands are a critical and dynamic part of that landscape leading down to Spirit Lake. Careful analysis of impacts of the proposed project on these wetlands should assess compliance with the Clean Water Act.
- 2.The highly-invasive New Zealand mudsnail poses a major problem to aquatic environments affected by the proposed project. That the project would greatly increase the risk of spread of this and other invasive species are inadequately dealt with in the EA.
- 3.Crushed rock to be imported to the project/Pumice Plain area is likely to contain seeds of exotic and native (but not present in the project area) species. Even freshly crushed rock in stock piles and in trucks can entrain seeds, that would then be placed in the project area. The notion that a botanist could provide adequate protection of Monument resources is unconvincing.
- 4.The rainbow trout in Spirit Lake may be wild winter steelhead that entered via natural processes; studies now underway will test this hypothesis. If so, you are dealing with a listed species, which requires much more thorough consideration.

I urge you to hit the pause button and do a more thorough analysis of the situation as it exists today and not downplay these and other critical resource issues, in keeping with your charge set forth in the National Volcanic Monument Act and the Monument Plan.

Thank you for considering these perspectives,

Fred Swanson

Research Geologist (retired), PNW Research Station