

Data Submitted (UTC 11): 10/24/2025 1:25:10 PM

First name: Debra

Last name: Ellers

Organization:

Title:

Comments: To Whom It Concerns:

I am a Washington resident, and have hiked in the region of Mt. St. Helens numerous times. It is important to me to protect as many natural features and resource values of the area to benefit wildlife and non-motorized recreation.

Accordingly, I support Preferred Alternative 2 -- Full Repair of Existing Tunnel + Alternative 9 -- Lake Storage as redundant safety feature.

It conserved public money, as it is the most cost-effective alternative because the tunnel already exists so it doesn't require new construction. Moreover, since repair work will occur inside the tunnel, this alternative is less weather dependent. It is also less susceptible to natural and volcanic hazards.

As a salmon advocate, it also important to me that this alternative will entail the least sediment washing into the Toutle River.

I also request analysis of the 2018 UTV Route to Duck Bay as an alternative to a road across the Pumice Plain to the barge-landing site for Alternative 2. (The "temporary road" across the Pumice Plain for the tunnel gate repair will be removed in 2027 and restored to the Truman Trail.)

The DEIS proposes building a permanent Truman Trail Road on the same alignment as the "temporary road" so Forest Service staff can drive to the shore of Spirit Lake and take a boat to the tunnel gate for maintenance.

A new Truman Trail Road would be a new ground-disturbing activity on an existing trail.

The road would be 16 feet wide and would have 21 crossings of creeks, drainages and wetlands, requiring permanent culverts, bridges and armored roadway embankments that are resistant to washout.

A new Truman Trail Road would overlap with 18 research sites and affect an additional 19 research sites within 250 meters.

The Forest Service has been using the 2018 UTV Route to Duck Bay and taking a boat to access the tunnel gate since 2018 but the DEIS does not evaluate it as an alternative to the cost and environmental impacts of a road.

Lastly, I oppose Preferred Alternative 7 -- Phased Natural Habitat Channel + Alternative 5 -- New Pressure Tunnel + Partial Repair of Existing Tunnel as redundant safety feature. The primary purpose of Alternative 7 is to remove the fish passage barrier of the debris avalanche. This alternative would use heavy machinery to excavate soils in the debris avalanche and the Pumice Plain to initiate a pilot channel and then let flowing water complete the channel formation to natural conditions, called Engineering with Nature.

The natural habitat channel would require a permanent Truman Trail Road across the Pumice Plain as well as temporary roads to facilitate heavy construction equipment to initiate the channel and haul excavated material to a storage site. This road would need to be built to a higher standard to support heavy construction equipment, which is damaging to soils, vegetation and wildlife. It would also be a long term impact, as the natural habitat channel would be constructed in phases, taking 10-20 years to complete once funding is obtained.

I also oppose this alternative, because the new Truman Trail Road would overlap with 18 research sites and affect an additional 19 research sites within 250 meters. The natural habitat channel and temporary road would overlap with an additional 5 research sites, permanently destroying or making them inaccessible. An additional 7

research sites are within 250 meters of the road and/or channel.

Excavation would convert natural wetlands, ponds and lakes on the debris avalanche into a flowing stream. Lowering Spirit Lake by 40 feet would alter vegetation communities on the shoreline and aquatic vegetation in the lake.

A major flaw in the DEIS is that it fails to mention or describe the legislated purposes of the Mount St. Helens National Volcanic Monument and it fails to analyze whether any of the alternatives are compatible with those purposes, specifically Sec. 4 (b)(1), "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." (P.L. 97-243). This alternative's phased natural habitat channel construction, which is a human-engineered project, manipulating and altering geologic forces and ecological succession, including converting palustrine wetlands, ponds and lakes to a stream channel, does not seem compatible with Sec. 4 (b)(1) of the Monument Act.

The natural habitat channel, since it is not a flood control measure, also exceeds the Monument Act exemption in Sec. 4 (b)(3) that "Nothing in this Act shall prohibit the Secretary from undertaking or permitting those measures within the Monument reasonably necessary to ensure public safety and prevent loss of life and property."

Please ensure that the Final EIS supports Preferred Alternative 2. Thank you for considering my comments.