



Washington Native Plant Society
Appreciate, Conserve, and Study Our Native Flora

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May 20, 2020

Regional Forester (Reviewing Officer)
Pacific Northwest Regional Office
Attn: 1570 Objections
P.O. Box 3623
Portland, Oregon 97208-3623

RE: Objection to Environmental Assessment, Finding of No Significant Impact and Draft Decision Notice for Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project, Gifford Pinchot National Forest, Mount St. Helens National Volcanic Monument

Dear Regional Forester;

The Washington Native Plant Society is writing to 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. We are submitting this objection under 36 CFR 218 Subparts A and B.

The Washington Native Plant Society has previously submitted timely, specific written comments on the Notice of Proposed Action for Scoping and Comment Period for this project. Our comments were received by the electronic system on January 13, 2020. Issues raised in this objection are based on our previous comments.

We acknowledge that the proposed project addresses the need to safely manage the Spirit Lake water levels to protect downstream public safety and property. While we support the need for this action, we believe that inadequate attention has been given to the unique attributes of the protected Mount St. Helens National Monument. We believe that construction of the proposed access road will have significant adverse impacts on plant community succession, compromising the ecological integrity of the area and disrupting on-going research. The preferred alternative presented in the EA, FONSI, and DN fails to adequately protect the Monument's truly unique ecological and scientific value, and we believe it would cause significant and irreparable harm to the affected area.

The Washington Native Plant Society asserts that the U.S. Forest Service should complete an Environmental Impact Statement in order to ensure that the review adequately assesses the ecologic harm and impacts to scientific research within the project area.

We believe the Forest Service has an obligation to BOTH protect downstream communities and preserve the Monument's research value.

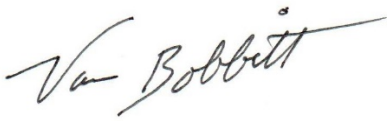
The Washington Native Plant Society disagrees with the EA analysis on the following findings:

- *The effects of this project have been appropriately and thoroughly considered with an analysis that is responsive to concerns and issues raised by the public (see Draft Decision Notice Appendix C: Summary of Public Comments on the Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project). (EA, Intensity, p. 2)* The Washington Native Plant Society disagrees with this statement. Concerns about the comment period timing and refusal to extend the comment period are not adequately addressed in the EA. The Forest Service responses to comments do not indicate an interest in exploring options that would limit or mitigate the valid concerns that are raised by many responders. While the letter of the law regarding the length of the comment period may have been met, the perception the public is left with is that the comment period was scheduled over the winter holidays to limit discussion and that the responses to the comments were preordained.
- *“The analysis of potential environmental impacts related to project activities demonstrates that no aspect of the selected alternative will result in any significant impact.” (EA, Context, p. 1)* The Washington Native Plant Society disagrees with this statement. The analysis discounts the significance of project impacts because, among other things it:
 1. Evaluates importance based on the project area’s geographic size rather than the unique attributes of the site,
 2. Narrowly construes the determination of what constitutes unique characteristics,
 3. Indicates a lack of understanding of the long-term scientific research taking place, much of which requires that natural processes not be interrupted by building a road, by stating it can resume after project completion,
 4. Optimistically predicts a return to pre-project conditions within a relatively short time-frame.
- *FONSI 4, p.4 “Based on my review of this project’s analysis, I do not find that the effects on the quality of the human environment associated with this project are highly controversial.”* The Washington Native Plant Society disagrees with this statement. An assertion is made that the project site will be returned to pre-project conditions. Although this analysis asserts the effect on area is inconsequential overall, it will be impossible to restore the value of the site, which is its unmanaged natural succession.
- *FONSI 5, p.4 “There were no highly uncertain, unique, or unknown risks identified for the selected alternative or its effects. I find that the effects analyses discussed in section 3 of the environmental assessment are based on sound scientific research. Public comments did not identify any highly uncertain, unique or unknown risks; therefore, the possible effects on the human environment are not likely to be highly uncertain nor do they involve unique or uncertain risks.”* The Washington Native Plant Society disagrees with this statement. The project site is at high risk from invasive species according to the *Final Specialist Input for Botany* (p 10). The addition of invasive species would interfere with the purposes of many of the research projects.
- *EA p.67 “Increased erosion potential and vegetation loss from this project area are expected to last for 15 years or more. Project design criteria will minimize the effects of vegetation loss and erosion and reduce the potential for introducing new species.”* This alone is a significant impact to the current scientific use of the project area. It is one-third to one-half of a scientist’s working career. Mitigation methods include revegetation, ensuring that the natural process of succession, the focus of much of the scientific research, will be lost. Soil disturbance and the opportunity for species introductions will

substantially increase the risk of introducing invasive botanical species beyond what exists currently. No amount of project design criteria can restore an unmanaged early seral plant community; and although it may somewhat lessen the risk of invasive species introduction, it is unlikely to decrease it enough to warrant a low-risk assessment. The Washington Native Plant Society notes that this is an area of high controversy regarding effects on the quality of the human environment associated with this project.

For the above reasons, the Washington Native Plant Society asks the Forest Service to conduct a full EIS in order to adequately understand and mitigate risks to our nation's treasured Mount St. Helens National Monument. As previously noted, the Washington Native Plant Society urges the Forest Service to reconsider the options and make sure that irreplaceable, long-term research is not unnecessarily lost as we improve public safety downstream from Spirit Lake.

Respectfully,

A handwritten signature in cursive script, reading "Van Bobbitt".

Van Bobbitt, President
Washington Native Plant Society

A handwritten signature in cursive script, reading "Rebecca A. Chaney".

Rebecca Chaney, Conservation Chair
Washington Native Plant Society