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First name: Darcy

Last name: Mitchem

Organization:

Title:

Comments: Spirit Lake Outflow Safety Improvement: Scoping Comments

Please consider the following comments related to the Spirit Lake Outflow Improvement Project.

1.Safety of downstream communities needs to be the overriding deciding factor in the alternative chosen. Other considerations must be subordinate to downstream, long-term safety (such as disturbance to scientific research plots, increased sedimentation, environmental impacts, or fish passage).

2.However, even with safety as the overriding consideration, the alternatives should provide multiple benefits if that can be accomplished along with providing safety. A benefit matrix should accompany each alternative and include fish passage, public access improvement, reduced sedimentation, cost and maintenance issues, preservation of scientific areas, ability to adapt to changing climate and geologic conditions, and ability to withstand future lahars from Mount St. Helens and regional earthquakes.

3.The alternatives should consider what would happen in 50, 100 or 200 years. It's been nearly 50 years since the eruption, and it seems geologic time works faster than government here. Imagine a future Toutle Valley completely reforested, and fish returning past an overgrown sediment dam through a sediment plain that is now a nice, forested valley. Salmon are abundant again, but cannot get back to Spirit Lake because of decisions made in the past, with no chance to modify or change course. Be adaptable. Think long term, not confining our alternatives to typical 20 or 30 year timelines. Every alternative should have a "next steps" phase for 50 or 100 years from today and each alternative should have the goal and engineering possibility of a naturally flowing outlet that lets in salmon and other fish, even if that will not occur for generations.

4.All alternatives should include the key elements and management directives of the Monument Act Section 4, which are protection of special features (b1), research and scientific study (4c), recreation and interpretation (e1) and all subject to public safety considerations and modifications (b3). These elements have often been referred to by the Forest Service as research, recreation, and education. Each alternative needs these three elements: after-action research, recreational considerations including lake access, and information for the public about the project that is available and visible at the site. The USFS has failed to do this for any past actions, and actually removed interpretation of human engineering at Mount St. Helens. For example, the existing tunnel outlet had a 504 pullout viewpoint area with proposed interpretation but it was never open to the public and the Mount St. Helens Visitor Center, which touched on some of the post-eruption actions was transferred to another agency. Addressing these three elements-research, recreation, and education-does not need to be expensive or elaborate. A simple trail to the lakeshore, or allowing hikers to use service roads to the lake, with interpretive sign or QR code with information will suffice. A new or existing research plot visible to the public would also help.

5.Public access to the lake should be part of the multiple benefits considered in the alternatives. The Spirit Lake Collaborative (which was a result of the by the National Science Foundation Decision Framework) has a shared goal of providing recreation and economic/cultural considerations. The Forest Service's 1985 Comprehensive Management plan had the Truman Trail following the shoreline of Spirit Lake, and said this trail would provide lake access and could be used for fishing access. (pg. 361 and Alt D Modified/Selected map). [This Trail 207, itself, was to replace a shuttle bus route that was in the selected alternative and removed.] When Trail 207 was finally built, it was moved away from the lake and only provides distant views of the water, keeping citizens from reconnecting with the landscape and part of our heritage. Today only the remote Harmony Trail, which requires a drive from Randle or Cougar, actually touches the lake. (The Harmony Trail was NOT a replacement for lost access with the relocation of the Truman Trail, but was always part of the (modified) Selected Alternative.) The Comprehensive Management Plan directs some physical access to Spirit Lake from the Spirit Lake Highway, but it has never been allowed. Today, even walking old roads is off limits, and even the planned tunnel outlet

viewpoint is posted with threatening signs to prevent any citizen from viewing it. The Forest Service, and the scientists that effectively run the area, have made deliberate decisions to keep the public away and to create an illusion that the whole area is "completely natural" and "untouched by man". In reality, the area is highly engineered, but this fact has been intentionally hidden. We should use this new engineering process to right this past wrong, and build-in interpretation of the whole story of Spirit Lake, including an opportunity for the public to physically reconnect to Spirit Lake. At the very minimum, it must be directed that access roads and routes be open as hiking trails when not in active use. Each alternative should include public access to the lake (at a minimum allow hikers on the current access road) and interpretation of the geologic and constructed features. Educating the public on the whole story of Mount St. Helens, including geologic hazards, and the constructed response to those hazards, is imperative and part of your duty.

6. Before deciding on action alternatives, there should be a computer model of what size of lake probably would have resulted if "nature had been left alone" and the Spirit Lake had been allowed to breach, as expected. There must already be some idea of how much water would have flushed out, but also what the lake would have looked like afterward, and at what level it would have stabilized. This should be the goal size of the lake after the outflow improvement action. Reducing the size of the lake to its more "natural" size should be part of the alternatives. Less water in the lake makes it less dangerous, and also provides more storage space under several alternative ideas. A smaller lake could also absorb lahars or other flows from the crater, which, of course, is "pointed and aimed" right at Spirit Lake.

7. The possibility of volitional fish passage should be considered for each alternative. The WHOOSH fish passage system should also be considered for each alternative. This tube system allows fish to cross dams and could also work in a conduit or tunnel to move fish upstream.

8. Modify the buried conduit idea to provide a possible location and mechanism for an open channel outlet. Gradually pulling the conduit back, over time, could help create, slowly, an open channel outlet without major excavation. This idea was part of the preliminary suggestions of the Spirit Lake/Cowlitz/Toutle River collaborative, but doesn't appear in the list of possible alternatives in the scoping letter.

9. Most times the real expense over the long term is MAINTENANCE. It is often easier to get the large capital budget "ask" to build a major project, while the yearly maintenance costs and the budget support for ongoing expenses is the real problem. (The Forest Service at Mount St. Helens received the funding for three visitor centers, and they are currently not operating a single one!) Consider compounded maintenance cost for 50, 100 and 200 years.

10. It would be ideal to tie the Spirit Lake Outflow project to an update of the 1985 Monument Comprehensive Plan. There have been rumblings that the 1985 Plan could be updated soon with it's own process. It makes economic and logical sense to tie these two processes together in some way. It is counter-productive to not have some overlap in the research/recreation/and education components alongside this major safety project. Yes, the purpose and Need of each process is different, but the same agency is dealing with the same Monument Act mandate on the same land, so some coordination is logical.

Thank you,
Darcy Mitchem