

Data Submitted (UTC 11): 10/27/2025 7:50:30 PM

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Comments: Please see the attached uploaded Letter. Text included here:

October 27, 2025

Johanna Kovarik

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submitted electronically to <https://cara.fs2c.usda.gov/Public/CommentInput?Project=66482>

RE: Spirit Lake Outflow Safety Improvement Project Draft Environmental Impact Statement

Dear Ms. Kovarik,

The Washington Native Plant Society (WNPS) is a non-profit organization with 12 local chapters and 2,750 members statewide. For 49 years, WNPS members have prioritized conservation of intact native plants and plant habitats for their intrinsic ecological function and value. WNPS promotes native plant appreciation with a variety of educational and conservation activities across the State of Washington that are open to the public. Our members include both professional botanists, including scientists who conduct research on national forest lands, and citizen botanists who enjoy the study, conservation and stewardship of native plants as a recreational activity.

As an organization invested in the long-term recovery and stewardship of the Mount St. Helens National Volcanic Monument, we submit the following comments on the Spirit Lake Outflow Safety Improvement Project Draft Environmental Impact Statement (DEIS).

Botanizing as a Recreational Activity

We request that botanizing be recognized as a legitimate scientific and recreational activity on the Mount St. Helens National Volcanic Monument. Botanizing has a long history in Washington. Rooted in the oral traditions of our state's First Peoples, documented in the journal of botanist and explorer David Douglas, and continuing today with the meticulous records of the Washington Natural Heritage Program, the Burke Herbarium, and the WNPS plant lists compiled by citizen botanists, botanizing is a discipline worthy of recognition, promotion, and protection. Observations of citizen-botanists have contributed to the human knowledge base of all cultures for thousands of years. Protecting vulnerable habitats and rare plant species ensures that current and future generations will experience and benefit from functional and biologically diverse natural environments in Washington.

Impacts to State-listed Rare Plants and Ecological Communities

We request that the DEIS analysis include the impacts of all alternatives and road locations on the known presence of state-listed rare plants and rare ecological communities identified by the Washington Natural Heritage Program (WNHP).

According to the WNHP Data Explorer, *Carex proposita* (Smoky Mountain Sedge), a G4/S2 ranked species (state imperiled), occurs on the Pumice Plain uplands. According to the "Field Guide to Rare Plants of Washington," this species occurs on open, dry rocky slopes and ridges, and dry meadows near lakes and streams, often on talus near or above timberline. We request that the impacts of the alternatives, including road alignments, address this species.

Further, the WNHP has conducted Ecological Integrity Assessments to inform prioritization of protection and restoration actions in the state. According to WNHP Data Explorer, much of the Mount St. Helens National Volcanic Monument has been mapped for its ecological integrity and classified according to its ecological features. In particular, Palustrine Freshwater Ponds, Palustrine Freshwater Emergent Wetlands, and Palustrine Freshwater Forested/Shrub Wetlands have been inventoried as present on the Pumice Plain and would be impacted by one or more alternatives. We request that the alternatives, including road alignments, address impacts to ecological integrity.

Legislated Purposes of the Mount St. Helens National Volcanic Monument

The DEIS 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)

Preferred Alternatives

The DEIS presents nine alternatives and identifies two preferred alternatives which are combined alternatives but it does not contain a proposed action. We have focused our comments on the two preferred alternatives.

1. Preferred Alternative 2 + Alternative 9

WNPS supports Preferred Alternative 2 - Full Repair and Rehabilitation of the Existing Tunnel as the primary outflow measure, with Alternative 9 - Lake Storage as the redundant measure. This alternative could be quickly implemented since most work would occur underground, reducing the scheduling impacts of weather, and the equipment needed for the tunnel repairs would be transported by SR 504 to the existing staging area at the tunnel outlet portal. The project would use the existing intake infrastructure currently being repaired and take advantage of the presence of siphons for an alternate outflow during tunnel repairs. These features minimize ground disturbance risk and reduce the potential project cost when compared to the other alternatives. This alternative also would pose minor sediment mobilization risk because the repaired tunnel would operate with a similar outflow range as before.

There are controversial issues associated with this preferred alternative, however, which concern WNPS. They include construction of a permanent access road across the Pumice Plain (Truman Trail Access Road) and its impacts to recreation, research, and native plants.

Analyze 2018 UTV Route to Duck Bay as Alternative Spirit Lake Access

We request that this DEIS include analysis of the 2018 utility terrain vehicle (UTV) route to Duck Bay as an alternative to investing in new construction of a three mile permanent road across the Pumice Plain to the barge-loading facility on the shore of Spirit Lake (Truman Trail Access Road). The 2018 UTV route currently exists on the ground and has been sufficient to operate boats to access the tunnel intake portal until now.

The current UTV route to Duck Bay, whether continued as an UTV route or converted to a road, would avoid the major impact of converting the Truman Trail to a gravel road that would overlap 18 research sites, including botanical research such as lupine ecology and herbivory, lichen ecology, and plant ecology. The DEIS states on pages 242-243 that "construction and operation of the Truman Trail Road would result in major and permanent impacts to these sites, and they would be destroyed or no longer accessible."

In addition, the Truman Trail Access Road would have 21 crossings of creeks, drainages and wetlands. Road construction would require major, permanent impacts of cuts, fills, and engineered roadway structures like bridges, large culverts and erosion armoring to resist washouts and provide all-season access.

Additional potential impacts of the Truman Trail Road on research would be possible invasive species spread by vehicle tires and the pollution caused by vehicle tires shedding dust and micro-particles from friction with the road surface on the additional 19 research sites within 250 meters.

2. Preferred Alternative 7 + Alternative 5

WNPS does not support Alternative 7 - Phased Natural Habitat Channel Formation paired with Alternative 5 - New Pressure Tunnel, as the primary outflow facility, with the current, partially-repaired tunnel as the redundant measure.

Alternative 5 - New Pressure Tunnel is the most cost effective alternative and has the least risk of volcanic hazards and their impacts, and least impact on native plants and ecological integrity according to the risk assessment tool, so WNPS could support it as a stand-alone alternative.

When Alternative 5 is paired with Alternative 7 - Phased Natural Habitat Channel Formation, however, it forms an alternative that would have long-term adverse impacts to native plants, ecological integrity and botanical research, and WNPS cannot support it.

This alternative would require the Truman Trail Access Road to be engineered and built to a standard to carry heavy machinery, and for an additional temporary spur road to be extended down the debris avalanche to allow the machinery to excavate the pilot channel and to allow trucks to haul away excavated material to a storage site. This alternative would involve construction vehicles and associated traffic crossing the Pumice Plain for up to 20 years, perhaps more, causing long-term impact to native plant natural recovery and botanical and ecological research.

This alternative would use engineering to excavate a pilot channel in phases, converting palustrine wetlands, ponds and lakes to a flowing stream channel to provide aquatic habitat for fish. It also would involve a constructed, engineered outlet at the shore of Spirit Lake near the barge-loading facility.

This alternative would draw down the level of Spirit Lake by up to 40 feet, impacting both the lacustrine ecology of the lake. The DEIS fails to analyze the effects of this alternative on ecological integrity of the Spirit Lake lacustrine ecosystem, shoreline plant communities, and palustrine ponds, wetlands and freshwater forested/shrub wetlands.

Five additional research sites would be destroyed under this preferred alternative, in addition to those already destroyed by the Truman Trail Access Road described above, because the anticipated pathway of the natural habitat channel and the temporary haul road would overlap with them.

WNPS requests that the DEIS explain how 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, is compatible with Sec. 4 (b)(1) of the Monument Act.

This alternative 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." The engineered natural habitat channel is neither necessary for public safety nor to prevent the loss of life and property "because the primary purpose of the

Alternative 7 channel is to provide improved aquatic habitat including removing the fish passage barrier of the debris blockage. This is a habitat channel. It is not the primary outlet ..." (DEIS, page 213)

WNPS thanks you for the opportunity to submit comments on the DEIS for the Spirit Lake Outflow Safety Improvement Project. We look forward to seeing our comments addressed in the Final Environmental Impact Statement.

Sincerely, WNPS President - Gail Sklar