Date submitted (Pacific Standard Time): 5/12/2020 3:17:51 PM First name: Felice Last name: Kelly Organization: Title: Comments: To Whom It May Concern, I am writing today to object to the proposed Pumice Plain Road at Mount Saint Helens which is part of the project entitled "Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project #57259". I previously commented on the scoping for this project, and I do not feel that my concerns were adequately addressed in the planning. To address this deficiency, I would like to object to the current plan, Alternative B, which would lay a road across the Pumice Plain of Mt. St Helens in order to conduct work at Spirit Lake. My initial comments during scoping focused on two aspects of the project: 1. The failure to consider the impact of the road on the advancement of scientific knowledge through the research that is occurring on the Pumice Plain that will be disrupted. 2. The pollution and disruption of the small streams that cross the pumice plain and the downstream siltation of Spirit Lake. I object to the environmental assessment because it does not adequately address or mitigate either concern and it does not adequately consider reasonable alternatives to the Pumice Plain Road. First, the Environmental Assessment does not address the research occurring on the Pumice Plain in any meaningful way. The return of life to the Pumice Plain is truly a once-in-a-lifetime study event that has allowed researchers to learn about ecology starting from a natural clean slate. And though the eruption occurred forty years ago we are still learning so much about ecological resettlement in this area. By building a road in this area, you would essentially put an end to these studies, which require minimal human disturbance to monitor what natural ecological change looks like. Building the road would cause many disturbances including vegetation removal, land instability, erosion, and the introduction of non-local species as hitchhikers. The Pumice Plain is a truly unique site with a lot of variation in the patterns of establishment across the plain, and building the road would transport species and non-biological material from site to site. This would destroy the long-term investments in research, and compromise future research opportunities, since it would be impossible to return areas constructed into a road to pre-road ecological condition. Alternative B would cause irreversible damage to the unique long-term research that is being conducted there. Second, building this road across the plain would disrupt and degrade dozens of stream channels and expanses of wetlands. It makes it likely that invasive New Zealand Mud Snails will be introduced into the streams and wetlands, which could decimate the native invertebrates. These snails are nearly impossible to remove once they are established. Building this road will increase sedimentation in the small streams, which will disrupt resident insects and fish. These are just a few of the major environmental impacts of this proposed project. These likely impacts require an in-depth assessment, such as an Environmental Impact Statement, before a road is built. The current environmental assessment is inadequate. The project, as it is described, has failed to fully consider the reasonable alternatives in the proposal. This road does not need to be built, as large gear could be transported by helicopter and workers could access the site via existing trails. But these alternative strategies do not seem to have been seriously considered. Please reconsider the construction of this road across the Pumice Plain and all that will be lost or endangered if it goes through. I do not dispute that there are safety concerns at Spirit Lake, but I disagree that the only way to deal with them is to degrade and unique environment. I would appreciate being kept abreast of any future developments with this project.

 Sincerely, Felice Kelly, Ph.D