I, Laurie Kerr, declare as follows:

1. I represent the Cascade Volcano Chapter of the Great Old Broads for Wilderness (Broads). Broads is a national non-profit grassroots organization that engages and inspires activism to preserve and protect wilderness and wildlands. Founded in 1989, and as one of the few women-lead public land conservation organizations, Broads brings knowledge, leadership, and humor to the conservation movement to protect our last wild places on earth. We empower women to use democracy to defend our birthright—America’s public lands and waters – through education, advocacy, stewardship, and fun. Broads was created, in part, to protect the interests of senior populations who value roadless areas, enjoy them without mechanized means of transportation, and want to see these places protected in their natural state in perpetuity. Broads believes that wild places are valuable in their own right. We also respect the spirit and intent of national conservation legislation such as the National Environmental Policy Act, and we support sound science as a basis for policy decision making.
2. Since July 2017, after joining Broads in 2009, I have lead the Cascade Volcanoes Broadband (what we call our local chapters) located in Southwest Washington and Northwest Oregon. My role as a leader of the Cascade Volcanoes Broadband includes organizing chapter meetings, securing speakers, developing partnerships with like-minded groups, writing activity reports, leading advocacy events, writing grants, and leading stewardship events and hikes.
3. On May 18, 1980, when living in Long Beach, Washington, I overheard shouting from the next fairway, “The mountain blew! The mountain blew!” I was unaware of the significance of this at the time, but it did heighten my awareness of Mount St. Helens.
4. In August 1982, I relocated from Long Beach to Vancouver, Washington. This began my passion for exploring wild places in and around the mountain. The winter of 1985-86 I spent cross-country skiing around June Lake and Swift Creek in the Gifford Pinchot National Forest. I do remember never having experienced before such vast landscapes with rich resources of Douglas-Fir and basalt outcroppings. August 1986 remains memorable for me, which is when I experienced summiting my very first mountain top – Mount St. Helens – and looked into the crater of the erupted peak, even though I possessed no special equipment or mountaineer training. I imagined I was walking on the craters of the moon at the time while traversing the Plains of Abraham. Once acclimated, I was totally enthralled by the stark beauty of Mt. Adams, Mt. Hood. and Mt. Rainier while sitting on the top of the world.
5. After moving to Battle Ground, Washington in 1987, I noted volcanic ash from the eruption on our rooftop following a reroofing job. I hauled my two daughters, ages 6 and 8, up to the Ape Caves in 1998, offering us our first spelunking experience in the National Volcanic Monument. I recall with fondness the exuberance on my youngest daughter’s face when she was able to squeeze into the final portal at the end of the lava tube. Completely filling the small void, we quickly departed the tiny space.
6. My leadership position with the Broads has presented many opportunities for me to lead exploration, protection, and stewardship outings in and around the Monument as well as the Mount St. Helens area. The recreational and stewardship possibilities in this region are enormous. In August 2018, we conducted beaver habitat surveys to assess potential release sites with Cascade Forest Conservancy. Hiking the Hummocks Trail in 2018 introduced me to new geological landscapes which resembled the mole hills in my backyard. A side trip to the Mount St. Helens National Monument offered our group a half-day of education about the eruption and aftermath of the changing ecosystems. Kayaking outings to Merrill Lake and Coldwater Lake provided opportunities for discovering solitude on the mountain. We also explored the Trail of Two Forests within the Mt. St. Helens National Monument when lack of snow reduced our cross-country ski trip to hiking. Because of the reduced snowpack, our outings on the Monument have shifted from skiing to snowshoeing in recent years.
7. I have enjoyed recreating in many areas of the mountain outside of the Monument as well. I organized a campout in August 2019 at Iron Creek Campground where we hiked to Covel Falls, Angel Falls, and Layser Cave. Covel Falls was especially noteworthy since we experienced hiking the trail from behind the falls. Our group has also discovered the Siouxon Creek and Ape Canyon Trails in October 2019.
8. Following the opening of the Merrill Lake Department of Natural Resources (DNR) Lands, I have led outings exploring the Kalama River Falls as well as the DNR trails on this parcel in 2020 on several occasions. Guiding a small backpacking trip for women on the Toutle Trail along the Kalama River in August 2020 was also memorable. I am thankful that I remembered my mosquito repellent when we hiked into the Goat Marsh National Research Area in July 2020. Snowshoeing the June Lake area in January 2020 offered a vastly different perspective from the fall landscape of this region. I continue to regularly enjoy recreation on the Merrill Lake and Yale Reservoir DNR lands today due to its proximate location to my home.
9. My passion for the Mount St. Helens Monument is genuine and enduring. While I have submitted scoping comments to the Forest Service in opposition to the proposed project at Spirit Lake, I also acknowledge the public safety concerns regarding Spirit Lake and the inherent potential for catastrophic flooding to downstream communities. The Mount St. Helens region is an exceptional region. Scientists have been researching how ecosystems recover from disasters such as the eruption of Mount St. Helens in 1980. We have a unique opportunity to gain invaluable knowledge from this research to benefit other areas impacted by future natural disasters. The development of a road in this area would destroy data on which the research is based, and which could never be recovered if the road were to be built.
10. Roadless areas provide wildlife habitat and connectivity which cannot be replicated after a road is built. The noise, chemicals, and habitat loss due to the road building would also disrupt wildlife migration and nesting opportunities. Hiking along the Pumice Plain on a gravel road built for supplying materials to support infrastructure on Spirit Lake, a road that would replace the Truman Trail, would be a huge setback and impact to the aesthetic value for me, the Broads, and really, any hiker who values the natural world.
11. Great Old Broads for Wilderness supports the Forest Service in its concern for public safety if the scientific and ecologic integrity is maintained. Comments have been submitted on behalf of Broads during the scoping period. We are requesting a more thorough assessment of the environmental impacts of the project as well as an evaluation of alternatives to the proposal. Our concerns are shared by scientists and other environmental groups. Broads urged the Forest Service to reconsider their options and offer a less ecologically destructive plan for resolving the Spirit Lake Tunnel Gate problem.
12. I continue to explore the boundless wild places in the Mount St. Helens area and I intend to hike Curly Creek Falls, Quartz Creek, and the Cinnamon Trail as soon as an opportunity arises. It is my hope that these natural spaces can be shared with others in perpetuity, and I expect to continue to lead stewardship and other activities with Broads along with partner groups to preserve and protect the region. My chapter members share my concerns about the project.
13. A road that crosses the Pumice Plain would be devastating for hikers and scientists and the public at large.
14. A decision from this Court ordering the Forest Service to conduct a rigorous environmental analysis in an environmental impact statement of the need for and ways to address the long-term management needs of Spirit Lake and the Pumice Plain would address my concerns and the harm that the proposed project would cause me and the Broads.

Dated this 4th day of December, 2020.

Respectfully submitted,