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April 11, 2014

Janine Clayton, Forest Supervisor
Gifford Pinchot National Forest
USDA Forest Service
10600 NE 51st Circle
Vancouver, WA 98682

Re: iMUSH Project

Dear Janine:

This is a response to the document *Imaging Magma Under St. Helens, Draft Environmental Assessment*. We understand the project's purpose is to gather geophysical information on the "magmatic plumbing" of the greater Mount St. Helens area. Information gathered will influence hazards assessment and advance understanding of subduction zone processes. Per the draft EA, the shot hole sites will be outside of Wilderness. There will be magnetotelluric imaging sites in the Mt. Adams Wilderness (three sites) as well as in other Wildernesses. FOMA has a number of specific concerns and questions regarding this project.

Scoping and Lack of Notification

Scoping comments were requested July 19, 2013 and March 4, 2014. However the Friends of Mount Adams (FOMA) was not notified of this project and the request for scoping comments. Please put FOMA on the notification list for this and similar type of projects.

Specific Concerns, Questions

Will there be additional future tests besides the ones disclosed in the draft EA?

Shot Hole Sites

These sites will be outside of Wilderness but could be close to dispersed recreation sites, public roads and trails. Certainly some people will hear the blasts. A safety plan should be created that includes physically posting a closure zone and hazard notices. These notices should be posted in developed and dispersed recreation sites, trailheads and within a quarter mile of each shot hole site.

Researchers should conduct raptor nest surveys prior to blasting to determine what species are within the 1 mile blast zone. We oppose utilizing blasting sites within 65 yards of known suitable spotted owl habitat (X7-X7V1 and Y2-E2V1). To determine if the spotted owl nesting core has shifted surveys need to be done. While the blast will be underground, the potential disruptive impact to a spotted owl nest is not known. The blast may or may not disrupt the spotted owl nesting activity, therefore we recommend locating this shot hole site at least one mile away from the nest.

Although impacts to groundwater are stated on pages 11 and 21, impacts to seeps and springs are not addressed in the draft EA.

On page 13, the draft EA states the "instruments can be left on the surface in sensitive areas rather than being buried." Specific direction as to where and which areas this will occur needs to be in the EA.

Under Reclamation on page 14, the draft EA states "The geophones are removed and any displaced soil or vegetation is replaced." What native seeds or vegetation will the project proponent's plant?

We oppose drilling in site X5-X5V1 as it is within the prohibited ½ mile zone of a fish-bearing stream, (0.21 miles). In fact, eight other sites are proposed within fish-bearing stream buffers. What post project monitoring of fish populations in the buffer zone will be carried out?

Wilderness Magnetotelluric Imaging Sites

The draft EA states on pages 18, 48 and 54 that the “recording package” will be on the surface (not buried) and covered with a tarp. There is a contradictory statement on page 30 that says there will be excavation... “up to three foot deep and three foot square.” Obviously we recommend the instruments not be buried to minimize site disturbance. But this contradiction needs to be cleared up.

We recommend there be no paint, flagging or other marking of directions to the sites for researchers. Describing the sites with GPS coordinates would be sufficient to keep track of the sites and to enable their location.

How specifically will these Wilderness sites be restored (especially if there is a three foot wide and deep hole)? If the instrument package is just sitting on the surface, obviously there would not be any ground disturbance. But there would be a small hole for the electrode which is to be buried. How will the electrode hole be restored? After the tests are completed, equipment removed and restoration of the sites is done, there should not be any evidence of site disturbance.

On page 55 there is a discussion of benefits analysis of science versus stewardship, weighing the pros and cons. We have a concern that this kind of analysis sets a bad precedent whereby Wilderness values might be traded off. People could readily justify inappropriate uses in Wilderness, such as chain saws by merely crunching the economic numbers to back a decision.

Conclusion

Please keep our organization in the loop on this and similar projects. While valuable information will be gained from these studies for furthering science and human safety, we hope our concerns will be addressed.

Sincerely,

Darvel Lloyd

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