Swan View Coalition
3165 Foothill Rd.
Kalispell, MT 59901

Friends of the Wild Swan
P.O. Box 103
Bigfork, MT 59911

August 1, 2014

Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901
Attn: Chip Weber, Forest Supervisor
cweber@fs.fed.us

USFWS Montana Ecological Services
585 Shepard Way, Suite 1
Helena, MT 59601
Attn: Jodi Bush, Field Supervisor
Jodi_bush@fws.gov

Environmental Protection Agency
Federal Building
10 W. 15th Street, Suite 3200
Helena, MT 59626
Attn: Julie DalSoglio, Director
Dalsoglio.julie@epa.gov

Montana Dept. of Environmental Quality
Water Quality Planning Bureau
1520 East 6th Avenue, PO Box 200901
Helena, MT 59620
Attn: Mark Bostrom, Bureau Chief
MBostrom@mt.gov

Montana Dept. of Fish, Wildlife and Parks
490 North Meridian Road
Kalispell, MT 59901
Attn: Mark Deleray, Fisheries Manager
MDeleray@mt.gov

Montana Dept. of Environmental Quality
Enforcement Division
Helena, MT 59620
Att: Richard Jost, Complaint Coordinator
RJost@mt.gov

Re: Flathead National Forest Assessment of Sullivan Creek Mass Failure

Dear Mr. Weber, Ms. Bush, Ms. DalSoglio, Mr. Bostrom, Mr. Jost, and Mr. Deleray;

We have the following concerns with the Flathead National Forest's July 29, 2014, Assessment of the Sullivan Creek Mass Failure:

1. The Assessment attempts to compare this recent mass failure (Exhibit A) to 13 other instances of hillside erosion caused by the toe of the slope being eroded by Sullivan Creek. We've attached as Exhibit B Google Earth images of each of these slides. They demonstrate that erosion of the toe of the slope results in the steepening and unraveling of the hillside, not the semi-liquefied mass wasting we alerted you to in our letter of July 21, 2014.

2. The Assessment, on page 4, claims no evidence was found of overland flow of water along or across the road. We attach as Exhibit C the photo we provided you via our July 29 email. It shows a small ditch indicating water flowed off the outboard shoulder after running either down the road and/or sheeting across the road due to an overfull inboard ditch. This is the spot we identified as the lowest spot in this section of road, where the Assessment concurs "the ditch gradient is at or close to zero."

3. The Assessment, on page 5, provides a misleading comparison to the smaller road-fill slumps one-quarter mile north of the recent mass failure. It finds these small failures are occurring at a high point in the road and ditches, concluding from this that low points in roads and ditches have nothing to do with mass failures. On the contrary, perhaps the "high point" location is the reason why those are small failures while the "low point" location has spawned the very large mass failure at issue here.

Otherwise, the Assessment essentially supports our findings that the road ditch in the vicinity of the recent mass failure does not have enough pitch/grade to effectively carry intercepted water away from the area, nor enough properly placed culverts to carry that water as surface water to the other side of the road. That water must instead perk below the roadbed in these glacial till soils and, in this case, undoubtedly contributed to the soil saturation causing the recent mass failure and mudflow.

Our correspondence with you and the press on this issue has never claimed that the Sullivan Creek Road is the sole factor in the recent mass failure. Indeed, we note this road was built on an unstable hillside to begin with, adding that the road design and poor maintenance has compromised the hill slope hydrology.

The evidence shows the road was a contributing factor in how and to what degree this hillside failed. The Forest Service expects the public to believe that a mass failure of this magnitude had nothing to do with the road - even though the failure's apex is currently in the roadbed adjacent to the deepest portion of the road cut slope and the flattest, least drained stretch of ditch. This is not a simple matter of Sullivan Creek nibbling away at the toe of the hillside slope.

We appreciate your continued attention to this matter and we look forward to hearing from you.

Sincerely,

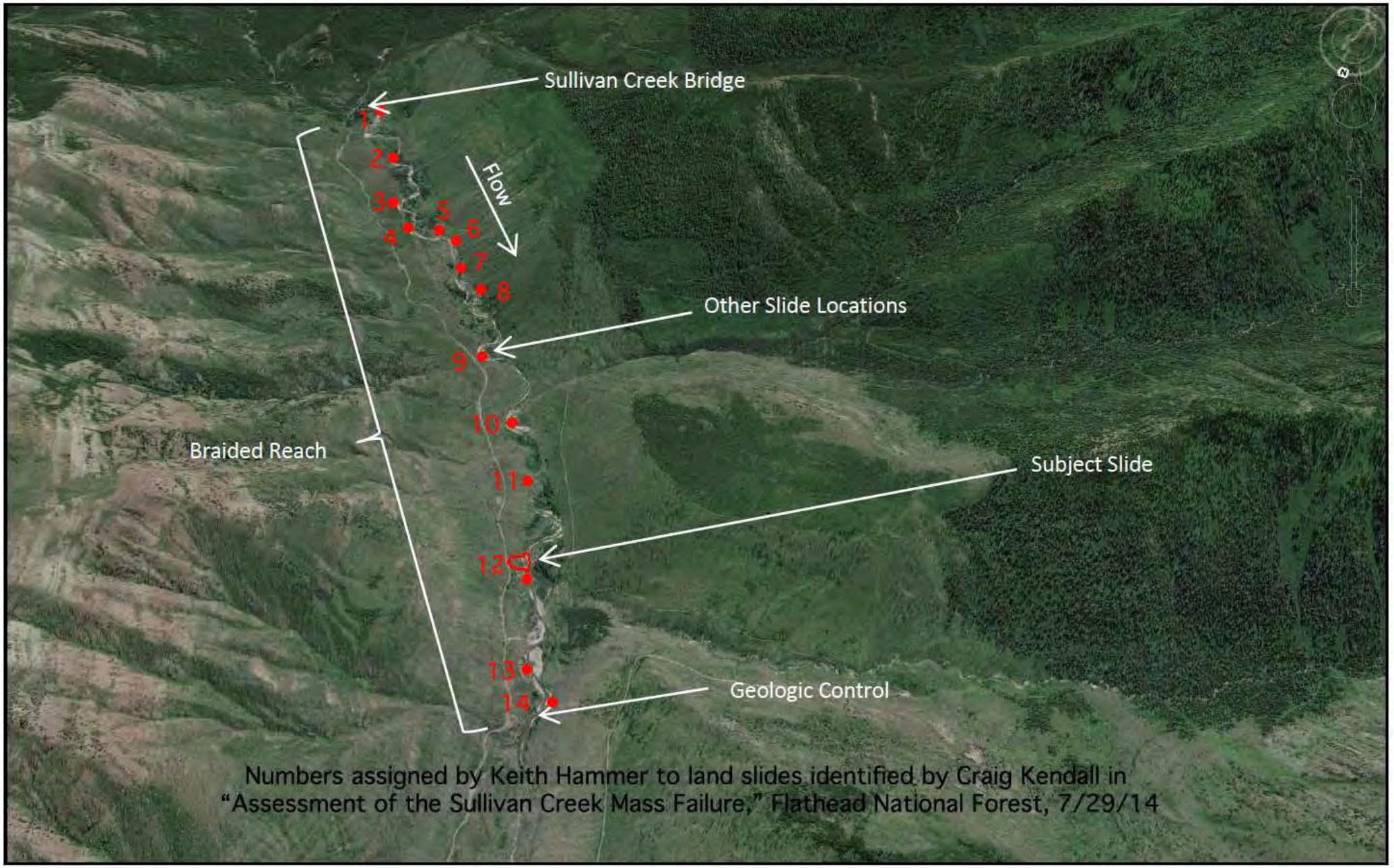
Keith Hammer - Chair
Swan View Coalition
keith@swanview.org

Arlene Montgomery - Program Director
Friends of the Wild Swan
arlene@wildswan.org

Attached are Exhibits A-C.

Exhibit A

Exhibit B


Sullivan Creek Bridge
Flow
Other Slide Locations
Braided Reach
Subject Slide
Geologic Control
1
2
3
4
5
6
7
8
9
10
11
12
13
14
Numbers assigned by Keith Hammer to land slides identified by Craig Kendall in
"Assessment of the Sullivan Creek Mass Failure," Flathead National Forest, 7/29/14

Slide 1
N
286 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.975384° lon -113.672801° elev 4087 ft eye alt 5399 ft

Slide 2
281 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.978988° lon -113.677400° elev 4029 ft eye alt 5399 ft

Slide 3
N
264 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.982315° lon -113.680405° elev 4001 ft eye alt 5399 ft

Slide 4
N
260 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.984156° lon -113.682474° elev 3991 ft eye alt 5399 ft

Slide 5
N
250 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.983879° lon -113.684482° elev 3984 ft eye alt 5184 ft

Slide 6
N
267 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.984292° lon -113.686364° elev 4004 ft eye alt 5184 ft

Slide 7
257 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.985427° lon -113.687549° elev 3993 ft eye alt 5184 ft

Slide 8
N
250 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.987502° lon -113.690382° elev 3970 ft eye alt 5184 ft

Slide 9
249 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.990832° lon -113.693847° elev 3913 ft eye alt 5184 ft

Slide 10
N
273 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 47.994427° lon -113.698418° elev 3885 ft eye alt 5184 ft

Slide 11
N
258 ft
Click to see historical imagery from 1990.
1990
Google earth
Imagery Date: 7/25/2013 lat 47.997552° lon -113.701405° elev 3873 ft eye alt 5184 ft

Slide 12 Before Mass Failure
225 ft
1990
Imagery Date: 7/25/2013 lat 48.001545° lon -113.703227° elev 3865 ft eye alt 5184 ft
Google earth

Slide 13
272 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 48.005657° lon -113.706787° elev 3834 ft eye alt 5184 ft

Slide 14
271 ft
Click to see historical imagery from 1990.
1990
Google earth
Imagery Date: 7/25/2013 lat 48.007259° lon -113.708270° elev 3844 ft eye alt 5184 ft

Exhibit C
< Slump Apex
Low Point Runoff >
< Willows