Swan View Coalition
3165 Foothill Rd.
Kalispell, MT 59901

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

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July 21, 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

Re: Massive road-related landslide into critical bull trout habitat in Sullivan Creek

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

On July 16, 2014, we discovered from a distance a massive road-related landslide that delivered part of Sullivan Creek Road #547 and considerable hillside directly into Sullivan Creek, which is designated "critical habitat" for threatened bull trout. (See Exhibit A). A review of historic Google Earth images indicates this landslide occurred since July 25, 2013, the most current image available in Google Earth. (See Exhibit B).

Our review of the historic images and our on-site visit on July 17, 2014, indicate the location of this road and failing to adequately drain it contributed directly to its recent failure. In short, there are no ditch-relief culverts in the vicinity of this landslide, which is causing ditch water to instead perk down under the road. The road in the slide area is located in the lowest points between the nearest ditch-relief culverts, which are 0.15 miles apart, with the slide roughly midway between. (See Exhibit B and our on-site video explanation at https://www.youtube.com/watch?v=951cOSt1wV8).

Indeed, the lowest point in the road coincides with the oldest indications of hillside slumping visible in the historical Google Earth images. The 2013 image (Exhibit B)

shows the recent landslide crack beginning to form. Exhibits C-E show water perking beneath the road in the now-failed landslide area. Exhibit F shows the landslide from the least undercut edge of the remaining roadbed.

Sullivan Creek is the best bull trout spawning stream in the South Fork Flathead outside of the wilderness. It consistently has the highest number of redds of the four Hungry Horse tributary streams that are sampled. The Environmental Protection Agency and Dept. of Environmental Quality's assessment of Sullivan Creek determined that water quality was good for aquatic life and recreation and was fully supporting beneficial uses.

We find this road-related landslide, the inappropriate location of the road, inadequate engineering of the road, ditch and culvert locations, and subsequent inadequate maintenance to be an adverse modification of bull trout "critical habitat" and a "taking" of bull trout in violation of the Endangered Species Act. It also degrades water quality in violation of the Clean Water Act.

We urge your agencies to work together to immediately address this problem so more fish habitat and water quality are not impacted. We also ask for a full investigation into this matter to disclose how this situation was allowed to develop over time.

We urge the Flathead to reconsider its policy of allowing a majority of its roads to be managed under Maintenance Level 1 (so-called "storage" between intermittent uses) without culverts being removed, drainage features installed, and the road rendered truly "hydrologically stable." And we urge the other agencies to formally consult with the Flathead over its recently released draft Travel Analysis Report (See the draft TAR at http://www.fs.usda.gov/detailfull/flathead/home/?cid=stelprd3806920&width=full).

Moreover, we urge all agencies to move swiftly on this and quickly complete road decommissioning of all roads up-road and upland of the recent landslide, while some level of access for heavy machinery is still available. Much work has been done in this watershed since Fish, Wildlife and Parks in 1995 provided the Flathead with a survey showing 52 culverts partially plugged or undermined and 13 culverts blown out in bull trout streams in the South Fork Flathead (Tom Weaver, 12/18/95). Much work remains, however, and these roads need to be rendered "hydrologically" reclaimed, not just demoted to Maintenance Level 1 where roads, ditches and culverts will not be adequately inspected and maintained.

Please provide us a written description of what you intend to do about this.

Sincerely,

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

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

Exhibit A

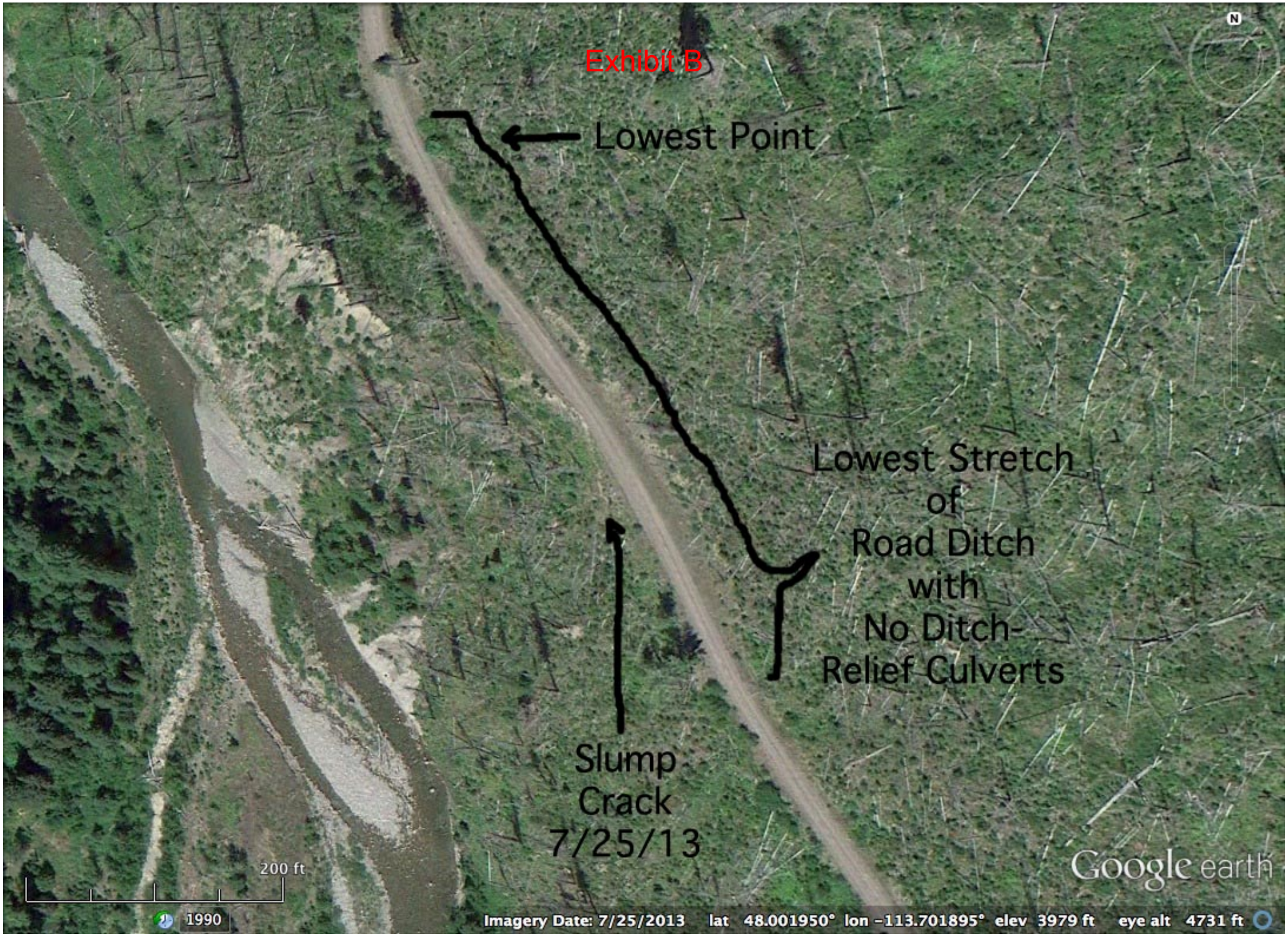
Exhibit B
Lowest Point
Lowest Stretch
of
Road Ditch
with
No Ditch-
Relief Culverts
Slump
Crack
7/25/13
200 ft
1990
Google earth
Imagery Date: 7/25/2013 lat 48.001950° lon -113.701895° elev 3979 ft eye alt 4731 ft

Exhibit C

Exhibit D

Exhibit E

Exhibit F