

CLARK FORK COALITION



Ron Burnett
Western Federal Lands Highway Division
Federal Highway Administration
610 East Fifth Street
Vancouver, WA 98661-3893

RE: Thompson River, Montana Forest Highway 56 Project Dear Mr.

Burnett:

On behalf of the Clark Fork Coalition, please accept the following comments on the proposed upgrade of the Thompson River Road. The Coalition is a member-supported group of citizens, scientists-, business people, and recreationists dedicated to protecting and restoring water quality throughout the Clark Fork River basin.

As documented in the Project Identification Report, Forest Highway 56 and a Plum Creek haul road running parallel are detrimental to the Thompson River: The dual road configuration has cut off meander channels, destroyed wetlands, and aggravated bank erosion. Dust and runoff from the gravel surfaces cause harmful sediment loads and fish habitat alterations. The river has been degraded to the point that it is on the Montana 303(d) list of impaired streams requiring a pollution reduction plan. From a water quality perspective, there is no question this road system is in need of an upgrade—particularly in light of the fact that the area has been designated by the State for bull trout recovery.

Because road reconstruction/obliteration is so crucial to the health of this fragile river corridor, the Coalition's 1,000 members have a keen interest in making certain this project achieves its water quality goals. We request that subsequent environmental review documents include the following:

1. **ASSESSMENT OF PRIVATE DEVELOPMENT PRESSURE:** Homebuilding and other commercial complexes are sure to follow close on the heels of a paved, realigned, and widened FH 56 that has access to camping, hiking, fishing, hunting, and scenic vistas. This sort of river corridor growth—with its influx of people and its septic drain fields—will likely degrade the Thompson River's ground and surface water and destroy aquatic habitat. In fact, it's conceivable that the gains made in reducing road-related sediment pollution will be erased and overwhelmed by increases in home construction-related sediment loading, bank stabilizing, and nutrient pollution. Please retain a qualified expert to develop growth projections for each alternative, and assess impacts to water quality.
2. **EXPANDED LIST OF ALTERNATIVES:** The list of alternatives is incomplete. In fact, the PIR presents, effectively, only two options: no action and paving. As discussed above, paving will inevitably bring intense development pressure and cause additional stress to the area's waters. It's imperative that the FHA consider an alternative that will not negate one of the project's core objectives—namely, Improving river conditions and habitat for resident fish. To remove the paving

bias from, the PIR, please develop a non-paving option, such as crushed aggregate with stabilization treatment. (See attached article on the use of calcium-chloride flake application.)

3. REVISED TRAFFIC PROJECTIONS AND ACCIDENT RISKS: According to the PIR, paving FH 56 will create a short-cut between Spokane and northern Montana and will draw significantly more commercial truck traffic. The report's traffic volume projections, however, don't adequately reflect this predicted increase. In fact, the assumption underlying the traffic volume computations is that only "a few commercial-trucks"—or a total of 5 a day—will be using the route by 2025 (p. 12 and Table 1). Please bring your truck-use computations into line with your stated forecasts regarding increased traffic volumes. And in the accident history section, please also address the risk of hazmat-carrying truck accidents and the potential for ground and surface water contamination.

4. RESTORATION PLAN:

A highlight of the proposed project is the goal of linking meander channels back into the main river and obliterating sections of abandoned road. Presumably the FHA will also commit to protecting existing vegetation and promoting healthy riparian zones. To ensure success in this area, the administration should develop concrete, quantifiable restoration goals—e.g., restoring XX river miles of meanders, removing XX yards of riprap, doubling the riparian buffer strip acreage, etc. Also, revegetation and bioengineering should be preferred over riprap at the 31 sites in need bank reinforcement.

5. THE WINTER MAINTENANCE ISSUE:

As a winter-time wearing surface, asphalt concrete pavement can get slick. This is particularly true on river-abutting roads that wind through narrow canyons—an apt description of the Thompson River road. It's reasonable to expect that the counties responsible for maintenance of the upgraded FH 56 will strive to make the road safe and reliable year-round. Spreading a layer of gravel over the road is likely the cheapest and easiest solution. But it re-introduces the sediment pollution problem because of surface runoff of fine-grained material. Salt-based sprays designed to prevent water on the road from freezing can be harmful as well if they work their way into ground and surface water. Please explore the winter maintenance issue and incorporate your findings into the advantages/disadvantages checklist accompanying each alternative.

Upgrading FH 56 — with its road obliteration and river/wetlands restoration components — is a big and critical step on the path to improving water quality in the Thompson River corridor. The Coalition encourages the FHA to take that step. Based on the information in the PIR, however, we are concerned that the current preferred solution — paving — is ultimately at odds with the water quality goals for the project. As a result, we urge the administration to make its \$47 million investment count by exploring the issues raised above and by giving particular attention to a non-paving option and a development risk assessment.

Again, thank you for the opportunity to comment. We look forward to seeing our comments reflected in future environmental review documents.

Sincerely,

Karen Knudsen Program Director

cc: Deborah Austin, Lolo NF Forest Supervisor

