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11 July 2011

Vicki Sullivan
U.S. Army Corps of Engineers
10 West 15th Street
Suite 2200
Helena, MT 59626

Re: proposed individual permit NOW-2011-130-MTH

Dear Vicki,

We are writing to urge the Corps to reject the application for an individual 404 dredge and fill permit for armoring 525 feet of bank with rock rip-rap on the lower Jefferson River near Three Forks in Gallatin County. The Corps is under no obligation to permit this project. No infrastructure is at risk. There are no health and safety issues involved. The lower Jefferson River is a meandering stream in a low-gradient alluvial valley. What it is doing is natural.

Further, there is little guarantee that the proposed bank armoring will work. The Jefferson River has exceeded its flood stage six times since 1980, including twice in the last two years, with peaks discharge approaching 17,000 cfs this year. It is not unreasonable to expect that with this much hydraulic force the proposed project could unravel, causing unpredictable results. Further, if the material holds, it would also not be unreasonable to expect increased bedload deposition in the vicinity of the gravel island, forcing the river to form a narrower, deeper and higher-velocity channel with a more erosive power along the length of the project and downstream. We, and the Corps, have seen this occur elsewhere. This is speculative, but the information provided with the public announcement for the permit discloses no data whatsoever on how the river will be expected to behave if the project is approved.

Irrespective of the Corps puzzling mitigation formula, we find the proposed mitigation to be fairly minimal. According to the narrative we've read, the applicant will plant 45 "trees" of unspecified size or species on 40-foot-centers in two strips,

one 450-foot-long and 300-foot-wide, and the other 300-foot-wide by 1,200-foot-long. Less than 2.5 percent of the area will be planted, and the consultant for the project says that 65 percent survival will be termed "success" That is, if 30 trees survive totaling an undisclosed basal area, irrespective of where they are in 1,650 feet of linear bank up to 450 wide, it will be termed successful riparian restoration. We disagree, as would riparian specialists. This proposed mitigation is primarily cosmetic.

The project as proposed should be rejected. If the applicant insists on "protecting" the streambank, his resources might be better spent on more aggressive, scientifically based riparian restoration that promotes significant root-mass development for reducing erosion. That could be coupled, perhaps, with some pilot, soft-bank stabilization techniques using natural materials. Or, the area could be left alone.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bruce Farling". The signature is written in a cursive, slightly slanted style.

Bruce Farling
Executive Director