



Date: March 28, 2023
To: Blaine County Commissioners
From: Jori McCune
Regarding: Glendale Road Bridge Stream Alteration Permit

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WoodRiverLandTrust.org
Federal ID: 82-0474191

Dear Blaine County Commissioners,

Regarding: Glendale Road Bridge Stream Alteration Permit

Thank you for the opportunity to comment on the Glendale Road Bridge Stream Alteration Permit. The Land Trust feels it's important to continue to work with landowners and consultants on stream alteration permit (SAP) applications to achieve a balance of flood protection and enhancing natural river function within the Big Wood River basin.

We understand the importance of protecting critical infrastructure from flood flows; even though continuing bank hardening with rip rap, construction of levees, removal of woody debris, and other actions used to protect infrastructure have caused severe harm to natural river function. Historic flood protection efforts of this nature have led to 21 miles of the Big Wood River to be lined with bank armoring, decreasing fish and wildlife habitat and increasing flooding impacts to downstream landowners.

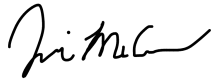
The Land Trust supports SAP applications that are in alignment with restoration design recommendations made within the Blaine County Comprehensive Plan and the Big Wood River Atlas (Cardno and Ecosystem Sciences, 2020). Restoration efforts should focus on removal of riprap where deemed not critical, modification of existing riprap to incorporate greater hydraulic complexity and wood, and limiting the construction of new riprap. Bank hardening and riprap should be considered only in cases where threats to infrastructure are imminent; and to the extent feasible, revetment design should include planting benches or other design elements to maintain edge cover. Large woody debris (LWD) should be incorporated where appropriate into restoration designs within the context of proper engineering and channel response analysis. Furthermore, the Land Trust believes the best way to decrease flooding impacts is to address the cause of flooding. Gravel removal from the river is considered to be a means of addressing symptoms, rather than causes, of river modification, geomorphic change, and flood responses (Cardno and Ecosystem Sciences, 2020).

We would recommend revegetation of riparian zones and the incorporation of LWD as a cost-effective alternative to bankside stabilization, which has the added benefit of improving aquatic habitat and reducing water quality impairments. Utilizing bioengineering treatments will function to reduce risk of flooding, erosion, and bank failure. If deemed necessary, we would recommend that artificial bank hardening treatments be placed as close to the infrastructure as possible.

Municipalities are in a challenging position to balance the protection of infrastructure and ecosystem enhancement with restoration goals. Stream restoration projects to undo past harmful practices that have been done to the river are expensive. The SAP process may be a unique opportunity to create a funding mechanism to help undo this damage. We would be interested in exploring the potential for creating a mechanism to fund stream restoration at a reach level through the implementation of a surcharge for SAP or other sources to offset the effects of sediment and woody debris removal, bank hardening with rip-rap, and channelization. We feel there is a balance that can be achieved between restoring the Big Wood River basin to a more natural state and protecting infrastructure, which this fund could help achieve.

We appreciate your time and consideration. Please let us know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jori McCune". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Jori McCune
Wood River Land Trust
Conservation Specialist

References

Cardno and Ecosystem Sciences. (2020). Big Wood River Atlas. Blaine County, Idaho. Thurow, R. (1987). Wood River fisheries investigations. Job Performance Report, Project F-73-R9. Idaho Department of Fish and Game.