



BCC 2010-109
May 12, 2010

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Mr. Tom Martin
Environmental Services Bureau
Montana Department of Transportation
P.O. Box 201001
Helena, MT 59620-1001

RE: Kearsal Module Transportation Project

Dear Mr. Martin:

Thank you for the opportunity to review and provide comment on the Environmental Assessment prepared for the Kearsal Sands Transportation Project. Included with this letter are our initial comments.

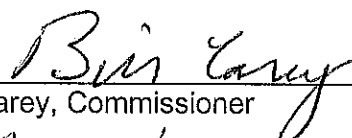
We believe inadequate time has been provided to fully evaluate the environmental assessment in conjunction with the supplemental information provided on your website. We also believe that the environmental assessment does not examine the true impacts to local communities.

We, therefore, respectfully request a ninety (90) day extension to better understand the project and its likely effects on our community.

Thank you in advance for your consideration.

Sincerely,
BOARD OF COUNTY COMMISSIONERS


Michele Landquist, Chair


Bill Carey, Commissioner


Jean Curtiss, Commissioner

BCC/ppr

cc: Greg Robertson, Public Works Director
Jim Lynch, Director, MDT

KEARL SANDS TRANSPORT PROJECT

Missoula County has a number of concerns related to the Kearl Sands Transport Project.

Missoula County did not receive the draft environmental documents until April 13, 2010, and has not had adequate time to fully evaluate its contents. There are significant potential public safety and welfare issues related to this project. Missoula County and other agencies require more time to provide meaningful input. An additional ninety (90) days is warranted to provide adequate, substantive comment.

Missoula County's concerns are related to **insufficient analysis and outreach**, specifically:

- **Alternate Routes.** The environmental assessment lacks adequate analysis of alternate routes. There is very little information provided explaining why no other route is feasible. No photos or plans are provided identifying "restrictions" or their location. No design alternatives, or their requisite costs, are offered investigating the feasibility of getting past these restrictions, such as temporarily improving on/off ramps to accommodate the modules, bridge deck modifications, alignment modifications or feasibility of repackaging the offending modules.
- **Public Safety.** The analysis provided and outreach conducted regarding conflicts with emergency response vehicles is inadequate. The County's emergency responders have had very little contact from representatives of the project. Considerable work needs to be accomplished before a record of decision is issued to adequately address emergency response plans and response times. Additionally, the EA states that the modules will be transported at night, yet the traffic control plans do not identify how the work areas will be illuminated within the work zone and approaching traffic. In the interest of public safety, the transport work zone should be illuminated, and the EA should state as much.
- **Recreation.** The analysis provided on impacts to recreation or tourism is inadequate and may underestimate impacts to our local community.
- **Cultural Resources.** Extensive consultation should have occurred to identify all cultural resources along the route. The plan should also include proposed mitigation efforts for each resource listed.

- **Public Transportation.** The environmental assessment does not provide contingency plans in the event of vehicle breakdown, spill, schedule delays or other hazard that may have an adverse impact on the traveling public. The document also fails to provide information on the impacts to adjacent public roads and the delays that users of those roads might experience. Further analysis examining the delay impacts to intersecting roads and driveways must be included in the proposed plan.
- **Public Infrastructure.** The Environmental Assessment fails to address impacts to the sewer main running directly under the approach to the weigh station that will stage the modules. The sewer main serves Highway 12 as part of Rural Special Improvement District No. 901. Large boulders in the vicinity restricted the sewer main from being installed at an adequate depth. The wheel loads created by the large vehicles required for the project will likely have adverse impacts to the sewer main, including the possibility of crushing the pipe. Missoula County requires the EA to include mitigation measures to this critical piece of public infrastructure.
- **Environmental Impacts.** Construction of pull-outs along the route may adversely affect significant environmental resources including damage to riparian areas, watersheds, and hillsides. There is a lack of analysis in the Environmental Assessment relative to environmental impacts resulting from constructing pull-outs.
- **Economic Impacts.** The analysis with respect to economic impacts is incomplete. The document fails to portray the true economic impact to local businesses, tourism and employment. Especially lacking are the effects to the transportation and timber products industry that are so important to our economy.
- **Inadequately Rigorous Analysis.** The issuance of a special use permit by the US Forest Service and potential impacts to cultural resources constitute federal actions. The Environmental Assessment should justify why an Environmental Impact Statement is not required and the project's exclusion from NEPA.
- **Unclear Project Scope.** The document discussion involves establishing a permanent route through Missoula County for these and other types of oversized loads. Requiring a full Environmental Impact Statement to study the cumulative impacts of making such a route permanent would bring the necessary analysis to bear in the context of greater public discourse.