

# **Finding of No Significant Impact (FONSI)**

on the

## **Environmental Assessment**

For the Miles City Street Projects:

<b>Wilson Street</b>	<b>Strevell Avenue</b>
<b>STPU 8013(1)</b>	<b>STPU 8006(1)</b>
<b>Control No. 4362</b>	<b>Control No. 4361</b>

And the No-Build Alternative on:

**Stower Street**  
**STPU 8009(2)**  
**Control No. 4363**

in Custer County, Montana

Submitted pursuant to  
42 U.S.C. 4332(2)(c), 49 U.S.C. 303,  
Sections 75-1-201 & 2-3-104, M.C.A.

by the

Montana Department of Transportation

and

U.S. Department of Transportation,  
Federal Highway Administration

**MASTER FILE  
COPY**

Federal Highway Administration

## Finding of No Significant Impact

For the Miles City Street Projects:

Wilson Street

Strevell Avenue

STPU 8013(1)


STPU 8006(1)

Control No. 4362

Control No. 4361

in Custer County, Montana

THE FEDERAL HIGHWAY ADMINISTRATION HAS DETERMINED THAT THESE PROPOSED PROJECTS WILL HAVE NO SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT. THIS *FINDING OF NO SIGNIFICANT IMPACT* IS BASED ON THE ATTACHED ENVIRONMENTAL ASSESSMENT WHICH HAS BEEN INDEPENDENTLY EVALUATED BY THE FEDERAL HIGHWAY ADMINISTRATION AND DETERMINED TO ADEQUATELY AND ACCURATELY DISCUSS THE NEED, ENVIRONMENTAL ISSUES AND IMPACTS OF THE PROPOSED PROJECT AND APPROPRIATE MITIGATION MEASURES. IT PROVIDES SUFFICIENT EVIDENCE AND ANALYSIS FOR DETERMINING THAT AN ENVIRONMENTAL IMPACT STATEMENT IS NOT REQUIRED. THE FHWA TAKES FULL RESPONSIBILITY FOR THE ACCURACY, SCOPE AND CONTENT OF THE ATTACHED ENVIRONMENTAL ASSESSMENT.



Ted Burch  
Federal Highway Administration

Date: 02/29/2005

**Table of Contents**

**1.0 SELECTION OF A PREFERRED ALTERNATIVE ..... 1**

**2.0 SUMMARY OF IMPACTS AND MITIGATION .....2**

*Summary of Impacts ..... 2*

*Summary of Mitigation ..... 7*

**3.0 COORDINATION PROCESS.....9**

**4.0 CLARIFICATIONS TO THE ENVIRONMENTAL ASSESSMENT .....10**

    PURPOSE AND NEED ..... 10

    NO-BUILD ALTERNATIVES ..... 11

    BUILD ALTERNATIVES..... 11

    IMPACTS ..... 13

*Access and Traffic ..... 13*

*Parking ..... 15*

*Community Resources..... 15*

*Land Use ..... 15*

*Right-of-Way and Relocations..... 15*

*Noise..... 16*

*Visual Impacts..... 17*

*" Effect on Values of Adjacent Properties ..... 18*

*Cultural/Archaeological/Historical Resources ..... 18*

*Water Quality..... 19*

*Farmlands..... 19*

*Air Quality..... 19*

*Secondary and Cumulative Impacts..... 19*

*Construction ..... 20*

    COMMENTS AND COORDINATION ..... 21

*Public Involvement ..... 21*

*Opportunities for Comments..... 21*

**5.0 APPENDICES .....22**

## 1.0 SELECTION OF A PREFERRED ALTERNATIVE

Administration proposed three roadway rehabilitation/reconstruction projects for Miles City as follows:

- Stower Street, Control Number 4363, STPU 8009(2)
- Wilson Street, Control Number 4362, STPU 8013(1)
- Strevell Avenue, Control Number 4361, STPU 8006(1)

Based on the Miles City Street Projects Environmental Assessment (EA) and the summary of public comments and responses, the Federal Highway Administration has selected the Preferred Alternative as follows:

- No-Build Alternative for Stower Street
- Build Alternative for Wilson Street
- Build Alternative for Strevell Avenue

The No-Build Alternative and the Build Alternative for each project are described in the attached Miles City Street Projects EA.

The Preferred Alternative achieves the purpose of improving vehicular and pedestrian travel movements and bringing the conditions of Wilson Street and Strevell Avenue up to MDT standards. The Code of Federal Regulations, 23 CFR 771.119 (i), states; "If, at any point in the EA process, the Administration determines that the action is likely to have a significant impact on the environment, the preparation of an EIS will be required." Due to the projected increase in traffic, public controversy and potential for significant impacts concerning the proposed construction on Stower Street, MDT and FHWA have selected the No-Build Alternative for this project. However, this does not preclude the City of Miles City from taking further action with regards to Stower Street improvements. No significant impacts were encountered on the Wilson Street and Strevell Avenue projects, and therefore, the build alternatives were selected for these projects.

The impacts of both the Build and No-Build Alternatives are summarized in Section 2 of this document.

## 2.0 SUMMARY OF IMPACTS AND MITIGATION

### Summary of Impacts

Table 1 summarizes the impacts of No-Build and the Build Alternatives for each of the categories discussed in the Environmental Assessment. The columns representing the Preferred Alternative are shaded.

**Table 1: Summary of Impacts**

Resource	Impacts for the No-Build Alternative			Impacts for the Build Alternative		
	Wilson Street	Strevell Avenue	Stower Street (Selected)	Wilson Street (Selected)	Strevell Avenue (Selected)	Stower Street
<b>Access</b>	No Impact	No Impact	Poor connectivity between the two commercial sections of town (Main Street and Haynes Avenue) would continue.	No Impact.	No Impact.	Improved access and connectivity between west and east sides of town
<b>Traffic</b>	No Impact	No Impact	Continued traffic congestion on Main Street.	No Impact	No Impact	Some Main Street traffic would divert to Stower Street resulting in a major increase in traffic on Stower Street. Also, some traffic from Comstock and Dickinson would also divert to Stower Street.
<b>Pedestrians &amp; Bicycles</b>	Continued lack of pedestrian facilities	Continued lack of pedestrian facilities	Continued lack of pedestrian facilities.  Continued pedestrian/vehicular conflicts on Dickinson Street because of no alternative traffic route to the college.	Improved pedestrian facilities, access and safety	Improved pedestrian facilities, access and safety	Improved pedestrian facilities and access

Table 1: Summary of Impacts (continued)

Resource	Impacts for the No-Build Alternative			Impacts for the Build Alternative		
	Wilson Street	Strevell Avenue	Stower Street (Selected)	Wilson Street (Selected)	Strevell Avenue (Selected)	Stower Street
<b>Parking</b>	Continued lack of adequate designated parking.	No Impact	Continued lack of adequate designated parking.	Would provide parking on both sides of the street	No Impact	Parking would be provided in more areas on Stower Street
<b>Community Resources</b>	No Impact	No Impact	No Impact	Improved roadway and sight conditions at intersections would improve travel time for emergency services. Improved access to medical facilities.	Improved roadway and sight conditions at intersections would improve travel time for emergency services. Improved access to medical facilities.	Improved vehicular and pedestrian access to elementary school, community college, church, and medical facilities.
<b>Land Use</b>	No Impact	No Impact	No Impact	No Impact	No Impact	Potential for change in land use on vacant agricultural parcel between Sewell and Moorehead Avenues as a result of extension of Stower Street through parcel.
<b>Right-of-way and Relocations</b>	No Impact	No Impact	No Impact	0.09 ha (0.22 ac) along the southern side of the drainage ditch on the southeast corner of the Wilson and Strevell intersection would be acquired for roadway improvements and detention pond.	No Impact	0.47 ha (1.16 ac) of land would be acquired between Sewell and Moorehead Avenues for Stower Street extension and detention pond.
<b>Noise</b>	No Impact	No Impact	No Impact	Same as No-Build	Same as No-Build	Noise levels would increase due to increases in traffic volumes. Traffic noise levels would not meet or exceed impact levels for noise abatement criteria.

**Table 1: Summary of Impacts (continued)**

Resource	Impacts for the No-Build Alternative			Impacts for the Build Alternative		
	Wilson Street	Strevell Avenue	Stower Street (Selected)	Wilson Street (Selected)	Strevell Avenue (Selected)	Stower Street
<b>Visual Impacts</b>	No improvement to the appearance of the exposed drainage ditch that parallels the south edge of Wilson Street.	No Impact	No Impact	Minimal impacts due to removal of landscaping vegetation and trees  Minimal impacts due to the addition of a square shaped detention pond, which would be surrounded by a chainlink fence and landscaping.  Improved appearance of exposed drainage ditch which would be replaced with an underground drainage facility	Minimal impacts due to removal of landscaping vegetation and trees	Moderate impacts due to construction of a new roadway  Minimal impacts due to removal of landscaping vegetation and trees  Minimal impacts due to the addition of a square shaped detention pond, which would be surrounded by a chainlink fence and landscaping.
<b>Effect on Values of Adjacent Properties</b>	No Impact	No Impact	No Impact	No direct impacts.  Increased "curb appeal" resulting from projects could indirectly cause increase values	No direct impacts.  Increased "curb appeal" resulting from projects could indirectly cause increase values	No direct impacts.  Increased "curb appeal" resulting from projects could indirectly cause increase values  Increased traffic volumes could indirectly reduce values.
<b>Local and Regional Economics</b>	No Impact	No Impact	No Impact	No Impact	No Impact	Positive impacts to businesses due to improved access to businesses in Haynes Avenue and Main Street commercial corridors.
<b>Environmental Justice</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact

**Table 1: Summary of Impacts (continued)**

Resource	Impacts for the No-Build Alternative			Impacts for the Build Alternative		
	Wilson Street	Strevell Avenue	Stower Street (Selected)	Wilson Street (Selected)	Strevell Avenue (Selected)	Stower Street
<b>Cultural/ Archaeological/ Historical Resources</b>	No Impact	No Impact	No effect to Site 24CR916, Thomas Shore Residence	No Impact	No Impact	No adverse effect to Site 24CR916, Thomas Shore Residence
<b>Section 4(f)</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Parks and Recreation/NL&amp;WCF – Section 6(f)</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Floodplains</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Water Quality</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Wetlands</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Biological Resources</b>	No Impact	No Impact	No Impact	No Impact	No Impact	May affect, but not likely to adversely affect, white-bract stickleaf, a plant species of special concern.
<b>Threatened and Endangered Species</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Farmlands</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Irrigation</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Air Quality</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
<b>Contaminated Sites/Hazardous Materials</b>	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact



**Table 1: Summary of Impacts (continued)**

Resource	Impacts for the No-Build Alternative			Impacts for the Build Alternative		
	Wilson Street	Strevell Avenue	Stower Street (Selected)	Wilson Street (Selected)	Strevell Avenue (Selected)	Stower Street
<b>Secondary and Cumulative Impacts</b>	No Impact	No Impact	No Impact	No Impact	No Impact	Extension of Stower Street between Sewell and Moorehead Avenues could encourage development on the currently vacant parcel in that location
<b>Construction Impacts</b>	No Impact	No Impact	No Impact	Temporary traffic delays and access limitations. Temporary disruption to utility service Potential for conflict with the site containing leaking tanks on the east end of Wilson Street during construction Potential for water quality impacts due to sediment run-off. Temporary air quality impacts due to dust and fumes emitted from construction equipment Potential for temporary increases in noise levels due to construction Potential for conflicts with active migratory bird nests.	Temporary traffic delays and access limitations. Temporary disruption to utility service Potential for sedimentation and equipment impacts in wetland area south of Strevell Avenue. Potential for water quality impacts due to sediment run-off. Temporary air quality impacts due to dust and fumes emitted from construction equipment Potential for temporary increases in noise levels due to construction Potential for conflicts with active migratory bird nests.	Temporary traffic delays and access limitations. Potential for water quality impacts due to sediment run-off. Temporary air quality impacts due to dust and fumes emitted from construction equipment Potential for temporary increases in noise levels due to construction Potential for conflicts with active migratory bird nests.

## ***Summary of Mitigation***

The following is a summary of mitigation for the Preferred Alternative.

### ***Right-of-Way and Relocations***

- For any potential right of way acquisitions or relocations, MDT and the City will comply with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 and 49 CFR 24, as amended.

### ***Construction***

- Access to the properties in the corridors would be maintained during construction.
- Using a "half-at-a-time" approach, traffic would be maintained through the projects' construction areas with appropriate signing and flagging in accordance with the Manual on Uniform Traffic Control Devices.
- During construction of the projects, pedestrian and bicycle traffic in the vicinity will be redirected as needed.
- Access to specific local businesses and residences during construction will be maintained as follows:
  - For access along Wilson Street, new laydown curbing is planned at the entrance of the Holy Rosary Hospital and along the north side of Wilson Street adjacent to Subway. The concrete curb needs time to cure and construction at the Holy Rosary entrance can be completed half at a time to maintain access. There is also access to the hospital off of Haynes Avenue at Boutelle Street. The curing also applies at Subway, and after that, MDT will specify that access needs to be maintained. There is access off of Haynes Avenue with existing parking areas east and north of the Subway building.
- Contractors will adhere to local ordinances and BMPs to minimize noise impacts during construction. In addition, MDT will use a special provision to limit construction hours from 6:00 AM to 6:00 PM to avoid noise impacts at night. Advance notice of construction will be provided area businesses and residences to minimize impacts on community activities.
- Construction techniques will adhere to MDT's standard specifications for stream protection and implementation of erosion control Best Management Practices (BMPs) as shown in the Erosion Control Plan. Best management practices will be utilized to minimize effects of sediment run-off during the construction period. All work will be done in accordance with the Water Quality Act of 1987 (P.L. 100-4), as amended.
- To mitigate potential wetland impacts from the Strevell Avenue project, Best Management Practices for Erosion Control will be placed adjacent to the road during construction at the southern end of Strevell Avenue and no equipment will be permitted in the wetland area. Every effort will be made to avoid any unnecessary impacts to the wetland area. No wetland replacement or other mitigation activities are required.
- All trees, shrubs and other woody vegetation within the construction limits of the proposed projects will be removed between September 1 and February 1, before the anticipated date of construction to avoid all conflicts with the federal Migratory Bird Treaty Act (MBTA). To further comply with the MBTA, every effort will be made to minimize the projects' effect on trees, shrubs and other woody vegetation that exist outside construction limits. All project work would cease immediately if an active nest of a migratory bird species is discovered within this project's construction limits. If this occurs, a Montana Fish, Wildlife and Parks (FWP) or MDT District Project Biologist will be contacted immediately for further assistance.

- To avoid potential conflict with the site containing leaking tanks at the east end of Wilson Street, the construction of the proposed project will not exceed beyond five feet below the soil surface. If minor contamination is discovered during construction, it will be handled through the *Standard Specifications for Road and Bridge Construction, 1995 Edition*.
- MDT will follow dust suppression Best Management Practices during construction.

### 3.0 COORDINATION PROCESS

The Environmental Assessment (EA) process and documentation has been coordinated with the appropriate federal, state and local agencies in order to comply with the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA). The EA was completed and released to the public on April 4, 2003 and was available to review at the following locations:

- Miles City Library
- Miles City Engineering Office
- H & T Printing in Miles City
- MDT Miles City Office
- MDT Glendive District Office in Glendive
- MDT Environmental Services Office in Helena
- Custer County Offices in Miles City

A copy of the Notice of Availability, which was published in the Miles City Star, is contained in Appendix C. Written comments on the EA were accepted from April 4, 2003 until May 15, 2003.

The EA identified the purpose and needs the proposed project would fulfill for the Miles City community. The EA also included the conceptual descriptions of the proposed projects, along with the effects these proposed projects were anticipated to have in comparison to the No-Build Alternative on the natural, physical and social environment. Mitigation was also identified. It also provided a summary of the participation activities and comments of the residents, stakeholders and affected agencies received prior to the release of the EA.

A public hearing was held during the Public Comment Period at the VA Auditorium on Tuesday, April 15, 2003 in the evening. MDT staff presented the conceptual design of the proposed projects and provided the opportunity for attendees to express their comments and questions verbally or by completing a comment form. Possible mitigation measures that were developed subsequent to the release of the EA were also discussed during this presentation. This public hearing was announced in the local papers, and flyers were distributed throughout the study area. The transcript of the public hearing is provided in Appendix D. Key issues raised during the public hearing and MDT responses to these issues are listed before the transcript.

MDT received written comments from sixty individuals. The written comments received during the public comment period are provided in Appendix A, along with MDT responses. The comments are organized alphabetically according to last name of the person that commented.

Overall, comments received have been favorable for the proposed Wilson Street and Strevell Avenue projects. Comments provided on the Stower Street proposed project are mixed. Several people who attended the public hearing and that provided written comments are opposed to the Stower Street proposed project. However, other residents in the Miles City community have commented verbally and in writing that they support this proposed project.

An additional opportunity was provided for Stower Street adjacent property owners to provide their input to the proposed project after the public hearing. MDT and the City held an additional meeting on August 19, 2003 at 7:00 pm at City Hall. This meeting was held to discuss modifications to the conceptual design for the Build Alternative and mitigation measures. Topics included landscaping, the potential for realigning sidewalks and using stand-up curbs to mitigate tree loss. MDT staff also provided an update on the progress of the proposed projects. Twenty-three people attended, including participants opposed to the Stower Street project.

As FHWA has selected the No-Build Alternative for the Stower Street project, no further coordination will be necessary with adjacent property owners.

## 4.0 CLARIFICATIONS TO THE ENVIRONMENTAL ASSESSMENT

This Addendum identifies items that have changed since the Environmental Assessment was released on April 4, 2003. Only the sections that changed have been included. Text deleted is shown in strikethrough font (for example, ~~LOS-B~~). Text added is shown in italics (for example, *“on the average”*). Original sections of text that have been revised and replaced are identified as such and shown as standard text. If not mentioned in this section, the conclusions on impacts and mitigation remain the same as stated in the original Environmental Assessment.

### PURPOSE AND NEED

#### Page 1, Paragraph 3 (Purpose of Proposed Projects)

Revise the sixth sentence to read: “The purpose of the three proposed projects is to improve vehicular and pedestrian travel movement in the City and surrounding neighborhood, while also bringing the conditions of the roads up to *MDT* standards.”

#### Page 5, Paragraph 5 (Need for Proposed Projects)

Revise the second sentence to read: “Also, the existing streets currently do not meet *MDT* design criteria for a level of service (*LOS*) *C* (~~LOS~~) ~~B~~ for local urban streets.”

Add the following sentence after the second sentence: “*The proposed projects would meet MDT design criteria required for LOS C for local urban streets.*”

#### Page 6 (Improving Safety)

Add the following three paragraphs to the end of this section:

*“Safety is a notable concern of the local community’s and an important consideration for MDT and the City in determining the conceptual design of the project. The addition of continuous sidewalks and the increased sight distances associated with the proposed projects are considered to be safety improvements.*

*The safety of students of the Highland Park Elementary School, also a concern of the community’s, has been addressed by meeting with the school’s superintendent. Through his feedback, it is likely that the existing crosswalks at the corners of Cale and Earling will be moved to the south to mid-block locations.*

*Stop signs along Stower, including the four-way stop at Strevell and Stower, will be maintained should the proposed projects be implemented. The existing speed limits will be maintained. The safety mechanisms at the railroad crossing at 8<sup>th</sup> and Main (flashing lights and gates) will remain in place. Semi-truck traffic will be prohibited from driving on these streets. (See the Traffic Section for more details.)”*

#### Page 7, Paragraph 1 (Improving Stormwater Drainage)

Revise the first sentence to read: “The Wilson Street proposed project would eliminate this problem by replacing the existing ditch with an enclosed drainage facility under the new sidewalk on the south side of this corridor, *along with adding a new detention pond on the south side of Wilson, just east of the Sewell Ave. intersection.*”

## **NO-BUILD ALTERNATIVES**

### **Page 11, Paragraph 6 (Wilson Street)**

Revise the third sentence to read: "A 0.6 m (2 ft) wide open grass drainage ditch is located on the southern edge of the road. The current roadway is *8.11 m (26.6 ft)* ~~11.58 m (38.0 ft)~~ wide *on average.*"

### **Page 12, Paragraph 1 (Stower Street)**

Revise the seventh sentence to read: "The dimension of the existing street is *10.18 m (33.4 ft)* ~~9.4 m (30.8 ft)~~ wide *from front of curb to front of curb, or 10.66 m (34.97 ft) from back of curb to back of curb* in the western section and *14.0 m (45.9 ft) wide from front of curb to front of curb or 14.48 m (47.51 ft) from back of curb to back of curb* in the eastern section."

### **Page 12, Paragraph 2 (Strevell Avenue)**

Revise the seventh sentence to read: "The existing width of this street is *9.0 m (29.5 ft)* ~~8.4 m (27.6 ft)~~ *on average.*"

## **BUILD ALTERNATIVES**

### **Page 12, Paragraph 5 (Wilson Street)**

Add the following sentence after the sixth sentence: "*A new square-shaped detention pond, measuring approximately 18.3 m (60.0 ft) on each side, would be located on the south side of Wilson, just east of the Sewell Avenue intersection.*"

Page 13

Table 1 was edited as follows:

**Table 1: Measurements and Elements of Proposed Projects**

	No-Build Alternative	Build Alternatives		
Proposed Project	Existing Measurements and Elements	Proposed Measurements of Roadway Width *	Right of Way Envelope	Additional Elements
Wilson Street	<p>8.11 m (26.6 ft) avg <del>41.58 m (38.0 ft)</del></p> <p>-no curbs, gutters, or sidewalks</p> <p>-drainage ditch on south</p>	<p>2 lanes @ 3.6m (11.8ft) each</p> <p>2 parking lanes @ 2.91m (9.55ft) each</p> <p>Total: 13.02m (42.7ft)</p>	<p>Existing ROW varies from 20.8m (68.2ft) to 26m (85.3ft)</p> <p>Roadway improvements to occur within City- owned ROW</p> <p><i>Total property to be acquired = 0.09 ha (0.22 ac). This would be composed of a 0.03 ha (0.07 ac) strip of property along the southern edge of the ditch and 0.06 ha (0.15 ac) for the new detention pond.</i></p>	<p>Add curbs, gutters on both sides</p> <p>Add a 1.525m (5.0 ft) sidewalk on south side; no sidewalk to be provided on north side</p> <p>Construct new enclosed drainage system. <i>Construct new detention pond on south side of Wilson east of Strevell, measuring 18.3 m (60.0 ft) on each side.</i></p> <p>Width of total typical section = 15.03 m (49.3 ft) from back of new curb to back of new sidewalk</p>
Stower Street	<p>Western section: 10.18 m (33.4 ft) front of curb to front of curb <del>9.4 m (30.8 ft)</del></p> <p>Eastern section: 14.0 m (45.9 ft) front of curb to front of curb</p> <p>-includes curb, gutter, discontinuous sidewalk in locations, and drainage system</p>	<p>Western &amp; Middle: Two lanes 3.6m (11.8ft) each Two parking lanes 2.91m (9.55ft) each</p> <p>Total: 13.02m (42.7ft) front of curb to front of curb or 13.5 m (44.3 ft) back of curb to back of curb</p> <p>Eastern Section: Two lanes 3.6m (11.8ft) each Two parking lanes 3.4m (11.15ft) each</p> <p>Total: 14.0m (45.9ft)</p>	<p>Existing ROW = 20.8 m (68.0 ft)</p> <p><i>In middle section (Sewell to Moore-head), need to acquire a total of 0.47 ha (1.16 ac) of private property. Of this, 0.415 ha (1.02 ac) would be for the new street and 0.055 ha (0.14 ac) for the new detention pond.</i></p> <p>Other improvements to occur within City-owned ROW</p>	<p>Add curb, gutters on both sides</p> <p>Add new 1.525m (5.0 ft) sidewalks on both sides of street</p> <p>Between Sewell and Moorehead Avenues, add new sidewalks at 1.525m (5.0 ft) each and curb/gutters</p> <p>Construct detention pond for new roadway portion at <del>either</del> northeast or southeast quadrant of Sewell/Stower intersection</p> <p>Width of total typical section = 16.55 m (54.3 ft) from back of new sidewalk to back of new sidewalk</p>
Strevell Avenue	<p>9.0 m (29.5 ft) avg <del>8.4 m (27.6 ft)</del></p> <p>-includes curb, gutter on west</p> <p>-drainage ditch on east</p> <p>-no sidewalks on either side</p>	<p>2 lanes @ 3.6m (11.8ft) each</p> <p>2 shldrs @ 1.48m (4.86 ft) each</p> <p>Total roadway width: 10.16m (33.3 ft)</p>	<p>Existing ROW = <i>Varies from 17.8 m to 21.4 m (58.4 to 70.2 ft)</i> <del>20.8 m (68.0 ft)</del></p> <p>All improvements to occur within City-owned ROW</p>	<p>New roadway width would match the width of Strevell Ave north of Wilson</p> <p>Add one sidewalk on east side 1.525m (5.0 ft). No sidewalk to be provided on west side.</p> <p><i>Perpetuate improve</i> existing drainage on east side of new sidewalk by adding "v-ditch."</p> <p>Uses existing curb on west side and install new curb on east side.</p> <p>Width of total typical section = 12.165 m (39.9 ft) from back of existing west side curb to back of new sidewalk on east side</p>

\*As approved by Miles City Council at the 5/28/02 public meeting.

Source: MDT Project Plans, 2002 and Preliminary Field Reports, 2000. Revised 12/03.

**Page 14, Paragraph 1 (Wilson Street)**

Revise the paragraph as follows: "Limited additional right-of-way may be required along the southern side of the drainage ditch *to allow for the maintenance of the new drainage facility and for the new detention pond at the southeast side of the Wilson and Sewell intersection.* ~~It is anticipated that this additional strip of property would measure approximately 1.525 m (5 ft) in width and total less than 0.41 ha (0.35 ac) in order to allow for the maintenance of the new drainage facility.~~ Exact measurements of additional right of way would be determined during final design if the proposed project proceeds."

**Page 14, Paragraph 7 (Stower Street)**

Revise the second sentence to read: "It would be located along Stower Street, *in the northeast quadrant of the Sewell and Stower intersection* ~~between Moorhead and Sewell Avenues, though the exact position has not been determined at this time.~~"

Revise the third sentence to read: "It would be ~~square~~ *rectangular* in shape and estimated to measure approximately *10.8 m (35.4 ft) on each side* ~~6 m (20 ft) wide by 9 m (30 ft) long,~~ though the exact measurements would be determined during final design if the proposed project proceeds."

**Page 14, Paragraph 8 (Stower Street)**

Revise the first sentence to read: "*New drop inlets* ~~Concrete valley gutters~~ would be installed at corners for streets that intersect Stower Street."

**IMPACTS*****Access and Traffic*****Page 18, Paragraphs 1 – 3 and Table 2 (Traffic)**

Replace with the following text and table:

"**Traffic.** MDT compiled traffic data for the streets that would be affected by the proposed projects. In response to comments at the public hearing on April 15, 2003, additional traffic analysis was undertaken by MDT. This work included verifying the existing and projected traffic volumes. The additional traffic counts and locations in the vicinity of the proposed projects are presented in Appendix E. This data was used to provide the Year 2000 and 2002 average daily traffic (ADT) volumes presented in Table 2. Traffic projections for Year 2022 associated with the Build Alternatives and the No Build Alternatives are also listed in Table 2."



**Table 2: Current and Projected ADT Data for No-Build and Build Alternatives**

Project	2000 Year ADT	2002 Year ADT	2022 Year ADT (No-Build Alternatives)	2022 Year ADT (Build Alternatives)	Percent increase between No-Build and Build Alternatives
<b>Wilson Street</b> Strevell to Haynes	1,400	1,430	1,760	1,760	0%
<b>Strevell Ave</b> Wilson to Stower (Site #46)	2,600	2,920	3,560	3,560	0%
Stower to Main (Site #48)	2,440	2,230	2,720	2,720	0%
<b>Stower Street</b> East of Moorehead (Site #78)	2,040	2,830	3,450	6,940	101%
Sewell to Strevell (Site #77)	560 (est.)	640 (est.)	700	6,940	891%
Strevell to Custer (Site #59)	1,430	2,045	2,540	6,940	173%
Custer to Montana (Site #58)	2,230	2,490 (est.)	3,040	8,430	177%
Atlantic to Main (8 <sup>th</sup> St) (Site #57)	2,990 (est)	2,910 (est)	3,640	5,640	55%
<b>Comstock St</b> East of Strevell (Site #60)	1,990	2,160	2,640	2,140	- 19%
West of Haynes (Site #61)	1,760	2,020	2,470	1,970	- 20%
<b>Main Street</b> West of Strevell (Site #21)	8,410	10,110	13,820	8,430	- 39%
East of Strevell (Site #22)	7,430	8,390	10,420	6,940	- 33%

Source: MDT, updated August and December 2003.

"Traffic volumes for all locations were projected to increase one percent annually from 2002 to 2022 for the No Build Alternatives. For Wilson Street and Strevell Avenue, the Year 2022 traffic volumes for the No Build and Build Alternatives are the same and therefore no increase in traffic on these streets is anticipated as a result of implementing the Build Alternative for either Wilson Street or Strevell Avenue.

For the Build Alternative of the Stower Street project, traffic patterns would be altered and would result in changes in traffic volumes on Stower Street, Main Street and Comstock Street. As shown in Table 2, for the Build Alternative, traffic on Main Street, near Strevell would decrease 33%-39% compared to the No Build Alternative. The traffic on Comstock Street for the Build Alternative in Year 2022 would also decrease 19 - 20% compared to the No Build Alternative, resulting in traffic volumes similar to today. On Stower Street, the traffic projected for the Build Alternative in Year 2022 would increase over the levels projected for the No Build Alternative. These traffic increases on Stower Street range from a 55% increase near Main Street to an 891% increase between Sewell Avenue and Strevell Avenue. The segment on Stower Street between

Strevell Avenue and Montana Avenue is projected to have a 173%-177% increase in traffic when comparing the No Build to the Build Alternative for Year 2022."

### **Page 18, Paragraph 5**

Add the following sentence to the end of the paragraph: "*Currently, each street has two lanes and speed limits are 25 mph, with a portion of Stower marked as 15 mph between Cale and Earling in the vicinity of the elementary school.*"

## ***Parking***

### **Page 20, paragraph 1**

Strike the second sentence from the document.

## ***Community Resources***

### **Page 22, paragraph 1 (Schools)**

Revise the second sentence to read: "The school actually faces ~~Comstock~~ *Cale*, and school buses and other school-related traffic currently congregate on Comstock between Cale and Earling."

### **Page 22, paragraph 5 (Churches/Synagogues)**

Strike the fourth and fifth sentences from the document. The First Christian Church does provide formal handicapped parking spaces.

## ***Land Use***

### **Page 24, paragraph 1**

Replace the fourth sentence with the following two sentences: "The proposed Stower Street project may have the indirect effect, therefore, of changing the existing land use of this vacant parcel. The commercial viability of this parcel may also be enhanced by the Stower Street project since the eastern half of this project is adjacent to other commercial properties."

## ***Right-of-Way and Relocations***

### **Page 24, Paragraph 4**

Revise the fourth paragraph to read as follows:

"However, limited additional right-of-way would be required along the southern side of the drainage ditch ~~and proposed sidewalk~~ *for the maintenance of the facility and for a new detention pond located on the southeast corner of the Wilson and Strevell intersection. It is anticipated that this additional strip of property would measure approximately 1.525 m (5 ft) in width and total less than 0.41 ha (0.35 ac) in order to allow for the maintenance of the new drainage facility. It is anticipated that the total amount of property to be acquired would be 0.09 ha (0.22 ac). This would include a strip measuring approximately 2.0 m (6.56 ft) in width and totaling 0.03 ha (0.07 ac) for the maintenance of the new drainage facility and 0.06 ha (0.15 ac) for the new, square-shaped detention pond measuring 18.3 m (60.0 ft) on each side. Exact measurements of additional right of way would be determined during final design if the proposed project proceeds. In addition, construction permits would require approximately an additional acquisition of 0.21 ha (0.52 ac). This additional amount would be short-term or temporary in nature.*"

**Page 24, Paragraph 5**

Revise the sixth sentence to read: "For the Stower Street project, therefore, it is anticipated that a total acquisition of new right of way would sum approximately *0.47 ha (1.16 ac)* ~~0.60 hectares (1.5 acres)~~ in the form of land from the single private property owner."

Revise the seventh sentence to read: "Of this newly acquired property, 0.415 hectares (1.03 acres) would be used to construct the new roadway, ~~and the~~. The remaining *0.055 ha (0.14 ac)* of property would be used for the new *square-shaped* detention pond, *measuring approximately 10.8 m (35.4 ft) on each side.*"

**Page 24, Paragraph 6**

Add the following two sentences to the end of this paragraph: "*A construction permit would be needed for an amount of 0.11 ha (0.28 ac). This property acquisition would be short-term or temporary in nature.*"

**Page 25, Paragraph 1**

Strike the fourth, fifth, and sixth sentences from the document.

Add the following paragraph after paragraph 1:

*"During the process of final design, if the proposed projects proceed, specific right-of-way needs would be identified and individual landowners contacted. For any potential right of way acquisitions or relocations, MDT and the City will comply with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 and 49 CFR 24, as amended. The Uniform Relocation Act provides fair and equitable treatment of those owners and tenants whose properties will be acquired. Owners of property acquired for right-of-way will be compensated at fair market value, in accordance with the Uniform Act, Code of Federal Regulations, Montana State Statutes and MDT policies and procedures."*

**Noise****Page 26**

Add the following text after paragraph 2:

*"A detailed noise analysis was conducted by Big Sky Acoustics (BSA) on May 22, 2003. The entire study is available under separate cover, and may be provided by contacting MDT.*

*The Traffic Noise Study for the Stower Street – Miles City project was conducted by Big Sky Acoustics, LLC (BSA) according to the U.S. Code of Federal Regulations Part 772 (23 CFR 772) Procedures for Abatement of Highway Traffic Noise and Construction Noise, and Montana Department of Transportation's (MDT's) Traffic Noise Analysis and Abatement: Policy and Procedure Manual (June 2001). The potential noise impact at noise-sensitive receptor locations, i.e., residences, schools, churches, etc., due to vehicles traveling on Stower Street was studied.*

*For traffic noise studies, the equivalent noise level during a one-hour period,  $L_{eq}(h)$  is used, and the units of the  $L_{eq}(h)$  are A-weighted decibels (dBA). The equivalent noise level is defined as the steady state noise level that has the same acoustical energy as the actual, time-varying noise signal during the same time period. The  $L_{eq}(h)$  metric is useful for traffic noise studies because it uses a single number to describe the constantly fluctuating noise levels at a receptor location as vehicles pass by during a one-hour period.*

*According to MDT, traffic noise impacts occur if predicted  $L_{eq}(h)$  traffic noise levels are 66 dBA or greater in the project Design Year (2022) for the Build Alternative, or if the predicted  $L_{eq}(h)$  noise levels in the Design Year for the Build Alternative are 13 dBA or greater than the noise levels in the Present Year (2002) of the project for the No-Build Alternative. If either criterion is met, then*

*an impact occurs, and traffic noise abatement measures need to be considered to determine if they are reasonable and feasible.*

*For the analysis, BSA conducted four ambient noise level measurements at three locations, predicted traffic noise levels at 66 receptor locations that front Stower Street between Haynes Avenue and Atlantic Avenue, and determined if traffic noise impacts would occur at the receptors. The noise level measurements were conducted on April 15-16, 2003 to help determine the existing ambient noise levels, and to verify that the computer model used to predict the traffic noise levels was reasonably accurate.*

*Although the predicted levels indicate that traffic noise associated with the Build Alternative would become the dominant noise source along Stower Street east of Strevell Street, traffic noise levels do not meet or exceed the impact criteria for noise abatement as defined in 23 CFR 772 and MDT's Noise Policy.*

*In addition, BSA analyzed the potential for traffic impacts based on the revised traffic data provided by MDT. Analysis showed that the new traffic volumes would not meet or exceed the impact criteria for noise abatement as defined in 23 CFR 772 and MDT's Noise Policy. As such, traffic noise abatement measures were not considered."*

## **Visual Impacts**

### **Page 26, Paragraph 4 (Wilson Street)**

Replace this paragraph with the following:

*"In addition to those impacts mentioned above that are common to all three projects, the visual environment in the Wilson Street corridor would be impacted by a new square-shaped detention pond, which would be located on the south side of Wilson, just east of the Sewell Ave intersection. The pond would measure approximately 18.3 m (60.0 ft) on each side and would likely be surrounded by a six-foot chainlink fence and landscaping. However, the appearance of the existing drainage ditch that parallels the south side of Wilson Street would be improved by the proposed replacement of the ditch with an enclosed underground drainage ditch."*

### **Page 26, Paragraph 5 (Stower Street)**

Revise the fourth sentence to read: "Residential properties in this vicinity would still be adjacent to open lots and still have views of the vacant parcels, with the addition of a roadway and a new *square-shaped* detention pond."

Revise the sixth sentence to read: "The detention pond, *measuring approximately 10.8 m (35.4 ft) on each side*, would likely be surrounded by a six-foot chainlink fence and landscaping."

Add the following paragraph after paragraph 5:

*"For the portion of Stower Street west of Sewell, impacts would occur to the visual environment due to the removal of some of the mature trees located along the roadway. In addition, the appearance of the roadway would change to be wider and to include formalized curbs, gutters and continuous sidewalks."*

### **Page 26, Paragraph 7 (Mitigation)**

Replace this paragraph with the following:

"No mitigation is required for the No-Build Alternative (Stower Street). The changes to the visual environment associated with the proposed Wilson Street and Strevell Avenue projects are not considered to be major, and therefore no mitigation is required.

If the Build Alternative for the Stower Street project is implemented, the loss of mature trees and portions of landscaping along Stower Street and the addition of new roadway between Sewell

and Moorehead would be the two most predominant changes to the existing landscape. However, the overall visual environment would still include a neighborhood street lined by single-family residences and landscaping and would not be substantially different from the existing visual environment. Therefore no mitigation is recommended."

### **Page 27, Paragraph 7**

Add the following new section after the Local and Regional Economics section:

#### **"Effect on Values of Adjacent Properties**

*Property owners adjacent to the proposed projects, especially along Stower Street, have expressed their concern regarding the potential for the proposed Stower Street project to negatively impact the value of their properties.*

*It is uncertain what the impact of the proposed projects would have on the values of adjacent properties. On one hand, increased traffic volumes associated with the proposed Stower Street project could serve to indirectly reduce the value of adjacent properties. On the other hand, the improvements associated with the proposed projects, including curb, gutter and sidewalk improvements could serve to enhance "curb appeal" and thereby increase the values of the adjacent properties. However, because access will be maintained to the adjacent properties, and no right of way will be acquired from the adjacent properties, the proposed projects are assumed to have no direct impacts to the values of adjacent properties.*

*The No-Build Alternative (Stower Street) would have no impact to the values of adjacent properties."*

### **Cultural/Archaeological/Historical Resources**

#### **Page 29, paragraph 6 (Impacts)**

Replace the fifth and sixth sentences with the following:

"While there would be no encroachment on the Shore Residence and the mature landscaping most closely associated with the property would not be altered, there would be a change to the setting of the property with the widening of the road and the addition of the sidewalks, curb and gutter (sidewalk currently exists along the front of the property on Strevell Street.) Since there would be no encroachment on the Shore property and diminishment of the qualities that make the site eligible for the National Register of Historic Places would be perpetuated, MDT made the determination of No Adverse Effect pursuant to Section 106 of the National Historic Preservation Act."

#### **Page 29, Paragraph 8 (Mitigation)**

Add the following sentence to the beginning of this paragraph: "*No mitigation would be required for the No-Build Alternative (Stower Street).*"

Revise the first sentence to read: "~~MDT has confirmed~~ *If the Stower Street proposed project were implemented, the improvements in the vicinity of the Thomas Shore Residence would occur within the city-owned right-of-way and would have no adverse effect on the Thomas Shore Residence.*"

Revise the third sentence to read: "MDT initiated discussions with the property owners and created a Memorandum of Agreement (MOA), to mitigate the *No Adverse Effect determination effects of the proposed Stower Street project on their property. The property owners did not sign the MOA.*"

## **Water Quality**

### **Page 31, Paragraph 9 (Impacts)**

Revise the second sentence to read: "The Wilson Street proposed project includes replacing the existing drainage ditch on the south side of the street with a covered concrete ditch *and adding a new detention pond on the south side of Wilson, just east of the Sewell Avenue intersection.*"

## **Farmlands**

### **Page 35, Paragraph 6**

Revise the first sentence to read: "Consultation with the NRCS has confirmed *that there are no Prime or Statewide Important Farmland acres within the proposed project area. All these areas are classified as "Urban or Built-up" from the National Resource Inventory (USDA NRCS). Less than 0.05 ha (0.1 ac) of hayland would be impacted, however, that the 13.02 (42.7 ft) wide corridor of new right of way needed for the proposed Stower Street project, between Sewell to Moorhead, would not negatively impact the potential farmland along the western section of the vacant parcel.*"

## **Air Quality**

### **Page 36, Paragraph 2**

Revise the second sentence to read: "As such, the proposed alternatives are not covered under the U.S. Environmental Protection Agency's "Final Rule" of *September 15, 1997* ~~November 24, 1993~~ on Air Quality Conformity."

## **Secondary and Cumulative Impacts**

### **Page 37, Paragraph 1**

Add the following four paragraphs after the first paragraph:

*"Opening up the vacant parcel along Stower may have a secondary effect of a change in land use on this parcel. Changes in land use at this parcel would have an effect on the existing visual environment.*

*The MDT Railroad Grade Separation Study currently underway is determining which at-grade railroad crossings will be upgraded within the State. The proposed upgrade of the railroad crossing at Leighton on the north side of Miles City would have no bearing on the crossing at 8<sup>th</sup> and Main. MDT is not aware of any plans to grade separate the 8<sup>th</sup> Street and Main railroad crossing. If the Build Alternative for the Stower Street project were implemented, the existing safety mechanisms would remain in place, but traffic volumes would likely increase along Stower west of Strevell and would cross at the 8<sup>th</sup>/Main railroad crossing.*

*MDT is not aware of any projects or plans to improve Stower Street west of Strevell Avenue. There are no plans to change the designation of Stower Street from its existing classification as an urban collector street.*

*There are no other projects, planned, funded or under construction, that are in the reasonably foreseeable future that would have a bearing on the proposed projects. Impacts the proposed projects may have related to safety and other topics are addressed in the individual topic sections."*

## Construction

### Page 38, paragraphs 1 through 3

Replace the third paragraph with the following text:

"Access to specific local businesses and residences during construction is a concern expressed by the community. If the Build Alternative is implemented, the following mitigation measures will be taken.

- For access to Albertsons along Stower Street: cold milling will be performed followed by a plant mix overlay. MDT will specify that access needs to be maintained during construction although short delays can be expected.
- For access along Wilson Street: new laydown curbing is planned at the entrance of the Holy Rosary Hospital and along the north side of Wilson Street adjacent to Subway. The concrete curb needs time to cure and construction at the Holy Rosary entrance can be completed half at a time to maintain access. There is also access to the hospital off of Haynes Avenue at Boutelle Street. The curing also applies at Subway, and after that, MDT will specify that access needs to be maintained. There is access off of Haynes Avenue with existing parking areas east and north of the Subway building.

According to MDT, contractors are typically restricted from working on the construction of projects from 10:00 pm to 6:00 am. However, for these proposed projects, MDT would use a special provision that would restrict the contractor from working after 6:00 PM."

Add the following text after paragraph 3

*"FHWA Technical Advisory T6160.2 contains requirements for the evaluation of roadway construction noise. If there is a possibility that construction noise would be a sensitive and contentious issue, the proposed project must be in compliance with the above mentioned noise directive. While the impact of roadway construction noise does not appear to be substantial in this case, consideration was given to construction noise during project development. Based on public comments received throughout the NEPA process, it does not appear that construction noise would be a sensitive or contentious issue.*

*Contractors will adhere to local ordinances and BMPs to minimize noise impacts during construction. In addition, construction hours will be limited as discussed above to avoid noise impacts at night. Advance notice of construction will be provided area businesses and residences to minimize impacts on community activities."*

### Page 38, paragraph 6

Revise the first sentence to read: "*In order to avoid conflicts with the Migratory Bird Treaty Act (MBTA), no All trees, shrubs or and other woody vegetation within the construction limits of the proposed projects would be removed that are occupied by any active bird nests. Typically nests are active between April 1<sup>st</sup> through August 31<sup>st</sup>. between September 1 and February 1, before the anticipated date of construction to avoid all conflicts with the federal Migratory Bird Treaty Act (MBTA). The MDT project manager would enforce this measure.*"

## COMMENTS AND COORDINATION

### *Public Involvement*

#### **Page 41, Paragraph 3**

Add the following sentence after the second sentence: *"A copy of the signed petitions regarding the Stower Street project are not included in Appendix A due to size constraints, but are available by contacting MDT."*

#### **Page 41, Paragraph 4**

Revise the first sentence to read: *"A few of the reasons cited that the projects should be constructed are listed below: "* ~~To summarize, a large portion of the written comments support the proposed projects. They often cited the following reasons that the projects should be constructed:~~

#### **Page 41, Paragraph 5**

Revise the first sentence to read: *" Some of the reasons cited that the projects should not be constructed are given below: "* ~~Others, predominantly residents living adjacent to the Stower Street proposed project, expressed opposition to the project. Those who oppose the projects often listed the following concerns:~~

#### **Page 41, Paragraph 7**

Strike this paragraph from the document

### *Opportunities for Comments*

#### **Page 42, Paragraph 3**

Revise this paragraph as follows:

~~"Written comments related to this document the Environmental Assessment were will be~~ accepted during the Public Comment Period between **April 1, 2003 through May 15 May 1, 2003**. ~~Please direct comments-Comments were directed to:"~~

#### **Page 42, Paragraph 4**

Revise this paragraph as follows:

~~"A public hearing was will be held during the Public Comment Period at the VA Auditorium Miles City Community College on Tuesday, April 15 April 1, 2003 in the evening for residents to express their comments verbally. This meeting was will be announced in the local papers (a copy of the ad is provided in Appendix C)."~~



## **5.0 APPENDICES**

- Appendix A: Written Comments Received during the Public Comment Period and Responses
- Appendix B: Other Correspondence Received during the Public Comment Period and Responses
- Appendix C: Copy of Newspaper Announcement of Public Hearing
- Appendix D: Transcript of Public Hearing held on April 15, 2003 and List of Key Issues Raised
- Appendix E: Traffic Data compiled by MDT after Public Hearing
- Appendix F: Environmental Assessment – March 3, 2003

## **Appendix A:**

### Written Comments Received during the Public Comment Period and Responses to them

Comments in this section are organized alphabetically by the author's last name and numbered accordingly.

(The letter from A. Allison, numbered #60, is an exception.)

**Comment #1**

Montana Dept. of Trans Port  
Mr. Bill Mechesner

**RECEIVED**

4/17/03

MAY 14 2003

**ENVIRONMENTAL**

Re: Miles City Urban Street Projects  
Comments

**MASTER FILE  
COPY**

Enlight of the fact that there maybe some change and inconvenience to certain residences on the three street projects, I strongly support all 3 projects (Wilson, Strevell & Stower)

We are fortunate to have this money available and I feel confident that our city officials have chosen the appropriate projects for the long term benefit of our town

Please count me as a "strong supporter."

Sincerely

Tom Albes

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Off		

**Response**

Thank you for your comment.

As stated on page one of the FONSI, if at any point in the EA process, the Federal Highway Administration determines that the action is likely to have a significant impact on the environment, the preparation of an EIS will be required." Due to the projected increase in traffic, public controversy and potential for significant impacts concerning the proposed construction on Stower Street, MDT and FHWA have selected the No-Build Alternative for this project. No significant impacts are anticipated on the Wilson Street and Strevell Avenue projects and therefore, the build alternatives were selected for these projects.

**Comment #2**

REC'D MILES CITY MT 15-03 APR 14 44

Mr. Bill McChesney  
MT Dept. of Transportation

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

4/17/03

# 2

MASTER FILE  
COPY

Re: Stower, Strevell : Wilson Street Projects

As a 17 year residence of Miles City and an employee of Holy Rosary Hospital, I fully support all three of these street projects as "good" for our town. Although some residences will be affected, we must remember to look at the big picture for the benefit of our future growth.

You can count on me for "supporting" all three street projects

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Misc Supv. G M W		
		Shop Supv. G M W		
		Sectionmen G M W		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Material Supv		
		Utility Agent		
		Traffic Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		District File		
		Bulletin Board		

Sincerely  
Barbara P. Alburs  
3600 Wilson Street  
Miles City, MT  
59301

**Response**

Thank you for your comment.

See response to Comment #1

Comment #3

Response

60

MILES CITY PRESERVATION OFFICE

MASTER FILE COPY

April 16, 2003

RECEIVED

APR 18 2003

ENVIRONMENTAL

Jean Riley, P.E.  
MDT Environmental Services  
P.O. Box 201001  
Helena, MT 59620-1001

Dear Ms. Riley:

I am writing in regard to Stower Street Project (STPU 8006(1) Control #4363) in Miles City, Montana. I have several concerns about this project, both as the city Historic Preservation Officer and as a private citizen and native resident of Miles City.

I realize that because Wal-Mart Corporation partially paid for a street light at Stower and Haynes, the previous traffic pattern which used Comstock as the next through access after Main Street to Haynes Avenue was altered. Prior to the installation of this light, Comstock was the obvious route to Haynes Avenue. Because of the light, the Highway Department had to encourage the alteration of existing traffic patterns to encourage the use of Stower Street.

While extending Stower Street through the undeveloped Kosty property seems logical enough, the rest of the project seems to be based on several erroneous assumptions and ignores several serious concerns.

First, the project assumes that Haynes Avenue is the primary commercial venue in Miles City. While it is true there are a number of large commercial concerns on Haynes Avenue, downtown Main Street is still very much a commercial center. One of the primary components of economic growth in existing communities is to strengthen rather than weaken, existing Main Street economic areas. Encouraging traffic to avoid the principal through street in Miles City seems at odds with maintaining Main Street as a commercial center.

Second, the entire project seems to be based on the idea that Miles City needs a second major urban artery to Haynes Avenue. I see no indication of this, unless Stower Street is intended to become a truck route. Miles City is a small town. Stower Street is four blocks from Main. No one will save any appreciable amount of time by driving the four blocks from Main to Stower or the two block to the next through street, Comstock.

Additionally, while the Environmental Impact Statement on this project seems to assume that Miles City will grow dramatically and need this access, there is no evidence to support drastic growth. The population of Miles City has remained stable for more than ninety years. Even at best, population growth in Miles City will be slow.

The EIS also says that widening the street by one third and removing all the mature trees

3 (next page)

1. Thank you for your comment. MDT is not aware of any prior plans to recirculate traffic along Stower St for the purpose of utilizing the traffic light.
2. The EA states that both Haynes Ave and Main Street are the two main commercial corridors in the City. The Preferred Alternative for Stower Street is the No Build Alternative. Stower Street would not provide a continuous connection between Haynes Avenue and the commercial center on Main Street. Therefore, Main Street would continue as the principle through street.

## Comment #3 cont.

- 2 -

April 16, 2003

along with street will have "minimal" impact. I can't see how this is possible. It will change forever the character of an established residential neighborhood and turn what is now an attractive, tree-lined street into a road with no shade and little buffer between the existing homes and the increased traffic. With the trees gone, the traffic noise will increase and the danger to pedestrians will increase.

There is one National Historic Register property on this project and several other homes along the route that are eligible for listing. The character of these homes will be permanently altered if they lose a portion of their yards and are suddenly exposed to increased traffic noise, vibration and pollution.

As a gardener, I am appalled by the idea of destroying dozens of healthy, mature trees that provide shade and filter the air. One of the great traditions of American towns are streets lined with arching trees. Removing all the existing trees can only damage both the property values along Stower Street as well as damage the environment.

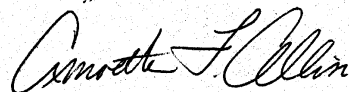
The Stower Street project also seeks to increase traffic density and speed along a nice wide urban street until that traffic encounters a complicated and dangerous five street intersection where Stower angles to cross a railroad track. At no time does the project address what will happen to all those cars, funneled down Stower, when they hit the Stower, Prairie, Missouri intersection. Once across the BNSF tracks, the street angles again and again encounter one of the triangular intersections Miles City is famous for. What happens there?

The EIS also says that emergency vehicles will benefit from the Stower Street project. The hospital is on Wilson, several blocks away. The fire station and police use Main. The only reason emergency vehicles would use Stower is if the emergency is ON Stower.

There has also been discussion of means that will be necessary to slow traffic on the newly widened street. If the street is not widened, it wouldn't be necessary to slow the traffic.

In short, I do not see that the project is needed since the town, while shifting in population, has not grown in population and I do not see why a quiet residential neighborhood should be sacrificed so that a few people can get to Wal-Mart two minutes faster.

Sincerely,



Amorette F. Allison  
Historic Preservation Officer

## Response

3. The City and MDT have been working with adjacent property owners along all three proposed projects to save trees and landscaping, that currently exist in the City's right-of-way, wherever possible.

The selected alternative for the Stower Street project will not affect trees, landscaping, historic properties, or traffic patterns. See response to Comment #1.

# Comment #4

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

Curtis T Almy  
28 N Montana  
Miles City, MT 59301

April 17, 2003

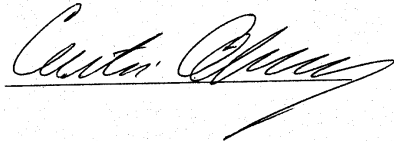
Bill McChesney  
Montana Department of Transportation  
Box 890  
Glendive, MT 59330-0890

RE: Stower Street Project...Miles City MT

Dear Sir:

I would like to add my support to the proposed Stower Street improvement. I serve on the city-county planning board and we have reviewed this project several times. The planning board has had an interest in the Stower Street project since the development of the Wal-Mart store. The planning board negotiated with the Wal-Mart developers in order to accommodate the store needs and the need to have Stower Street go through to the Michel addition. We were aware that eventually Stower would go through (to down town) and that it would make a lot of sense for our town to have two main "through" streets.

Thanks for taking the time to review the facts and listen to the public comments.



# Response

Thank you for your comment.

See response to Comment #1

REC'D MDTGLD APR 18 '03 AM 09:42

#3

MASTER FILE  
COPY

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Mich Supl. G.M.W		
		Shop Supl. G.M.W		
		Suppl. Mnt. G.M.W		
		ENGRERING SERVICES ENGR		
		Engr. Serv. Mgr		
		Engr. Serv. Asst		
		Engr. Serv. Tech		
		Traffic Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		District File		
		Bulletin Board		

Comment #5

Response

MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

or Ray Mengel

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

via fax # 406/377-8160, 5/15/03 cc: Kristin Kenyon 724/46-0973

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Sandra K. Anderson  
P.O. Box 190  
Miles City, MT 59301-0190  
406/347-5336 (ph/fax)  
" 951-5336 (cell/voice mail)

COMMENTS: Thank you for this opportunity to forward input. Some perspectives follow for consideration, which are hoped will be helpful:

-The process has been, it appears, an opportunity for the involved parties (eg city & county govt, DOT, Planning Office, Engineering Dept., et al) involved to identify where a uniform decision making and community input process needs: defining better and more done to raise awareness in the community on how to participate. It appears the DOT can try to address concerns to some degree. However, in the community, a significant cross-section does not seem to be aware of this. Many feel it's an "either/or" situation and is a "done deal", and there's no need for them to even try to provide input. This should be cleared up in all future meeting communications/announcements.

(Responses begin on next page)



## Comment #5 continued

- I believe the above would <sup>be</sup> helped if the first input session was before the plans were laid. That way people wouldn't feel like the dye was already cast.
- The idea the DOT & City Engineering Dept. put out at the last meeting to have a special session with the City Council, DOT, and Stower St. property owners/residents could help address the above. Follow-up on this meeting will be important in building community trust. Schedule so does not conflict w/ regular Council, Planning Board, etc. meetings, so there will be participation by Council Members, Planning Board Representatives, Mayor, City/County Planner, City Engineer, et al. Schedule in a large enough room (like last time) and set-up so conducive to interaction.
- There are some much-needed beginning steps in some areas <sup>of the community</sup> towards multi-agency collaboration and co-ordinated long-term planning. We need lots more of this in order to best use our limited resources and develop our assets ~~and~~ to avoid piecemeal that does not go towards integrated goals.

## Response

1. MDT and the City encourage the public to stay involved throughout the planning process. The City and MDT continued public outreach activities and held a meeting with Stower Street property owners on August 19, 2003.
2. MDT and the City agree that collaboration should continue throughout any subsequent phases of the proposed projects, and they will continue to work with adjacent property owners should the projects proceed.

## Comment #5 continued

Thus,  
it is hoped the City & DOT in doing the various highway projects will partner with related community, business & public projects & plans. (For example, the plan to connect the community with bike and pedestrian pathways per model provided to Kristin Kenyon by Nancy Doeden.)

It's wonderful to get these highway projects let's be sure we're doing all possible to coordinate and parlay them to maximize their benefits.

(NOTE: In an earlier meeting we talked about coordinating design features of the Main St. beautification project with the future DOT overlay project. Currently, the Main St. wheelchair cuts are being redone along with the traffic signal project. Couldn't there have been some design coordination here?)

- We are sidewalk-poor: Many that do exist are dangerously broken-up or do not connect with others. I believe there is a code requiring sidewalks within a six block radius of schools, which we do not have. We need to examine every option to begin remedying this. Therefore, I recommend re-siting ways the DOT projects can install sidewalks for bike paths on both sides while still addressing neighbors' & property owners' concerns and saving trees and landscaping. An example exists in

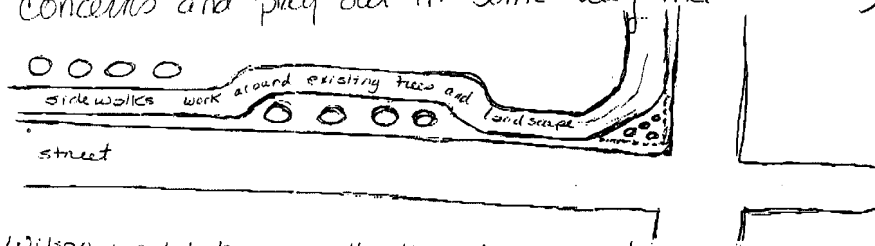
## Response

3. The City agrees that coordination should occur among projects in the City and will work to that end. While the City is aware of proposed bike plans, the proposed projects do not have right of way width available to include bike lanes at this time.

4. Providing continuous sidewalks is a key element of the proposed projects. While all projects originally included sidewalks on both sides of the street, the conceptual design of the Strevell and Wilson proposed projects now include sidewalks on one side of the street only subsequent to coordination with local residents.

## Comment #5 continued

Forsyth that could solve some of these concerns and play out in some way like below: } 5.



- Wilson used to be an attractive, tree-lined lane w/ cottonwoods on both sides. Use this project as an opportunity to restore Wilson with good-sized trees on both sides, from one end to the other.

- We need to save all the landscaping and trees, incl. our signature cottonwoods, <sup>possibly</sup> ~~we do not have the resources to replace them.~~ } cont.  
Trees improve property values, lower the heat index, help with air and noise pollution, generally enhancing quality of life.

• We're already losing a serious amount of trees to drought, inadequate preventative maintenance, age, development, and, now the <sup>prop.</sup> Main St. bridge project.

Save our trees.

Replace what absolutely have to be taken } cont.  
out with indigenous, drought-resistant trees, incl. ~~with~~ cottonwoods.

- Avoid homely, industrial-style chain link fences } 6.  
and open ditches and storm drains that fill up with trash and weeds, like at Albertsons.

## Response

5. MDT and the City will continue to work with adjacent property owners to discuss additional ways to aid in the preservation of trees. MDT will coordinate with property owners to replace trees that are impacted by these projects. The selected alternative for the Stover Street project is the No Build Alternative, which would not affect existing trees or landscaping.
6. The exact design features of the fence around the detention pond on Wilson Street and other elements will be determined in subsequent phases should the proposed projects proceed. MDT and the City are open to suggestions from the public regarding the design of project elements.

## Comment #5 continued

- Instead opening &/or widening Stower St, & negatively impacting homeowners and a major church, work with the existing through streets: Tompy, Comstock, along with Wilson. (Tompy and Comstock lead to So. Montana then 8<sup>th</sup> or 10<sup>th</sup> streets to Main St./City Center.)
- Some ideas for expanded use of the above three, existing through streets:
- Stop signs rather than yield signs on side streets
  - Sidewalks &/or bike paths on both sides opening with very visible crosswalks on So. Haynes
  - Level dips -- if for drainage, put under ground
  - Traffic signals, <sup>turn lanes,</sup> and signage at these intersections on So. Haynes.
- (The way So. Haynes is so jumbled up, one doesn't know where the through streets are, & hard to make turns.)
- This would also help organize the unsafe pedestrian traffic from the neighborhoods & motels trying to find a logical place to cross So. Haynes safely.
- Landscaping, trees, beautification so neighborhoods don't look overpaved with concrete and asphalt
  - To address Miles Community College access need, widen and straighten & make 2-way all the way through So. Sewell from Comstock to Dickinson (the front entrance of the College).

## Response

7. Additional traffic analysis for the proposed Stower Project was conducted by MDT since the public hearing and is described in Section 4, Clarifications to the Environmental Assessment.

Any new stop signs, traffic signals, intersection improvements, or landscaping on City streets are separate from the MDT proposed projects and may be considered by the City during future planning efforts. Thank you for these comments.

## Comment #5 continued

- If must open Stower St. from So. Haynes, incorporate the information from the newer development/preservation/environmental literature that illustrates ways to accommodate traffic and emergency vehicles <sup>so they</sup> without wide, unattractive, high-speed thoroughfares. (Reference: Suburban Nation: Rise of Sprawl)
- Recognize that residential and church properties that are going to be negatively impacted were given permits - probably based on inadequate long-term planning - to start with. They shouldn't have to pay the price for lack of city planning - they didn't move there to be on a major artery. <sup>At the very least, these residents deserve priority consideration to ameliorate the negative impacts. The upcoming special meeting for Stower St. people offers some hope.</sup> <sup>me so wide its too close to the</sup> <sup>through traffic</sup>
- Assure Stower St. will not become a truck route. (Also, look at new proposal to route truck traffic around the outskirts of town.)  
Route ~~through~~ large pick-up and trailer <sup>through traffic</sup> on truck routes rather than residential Stower St.

## Response

8. Comments noted. The Preferred Alternative for the Stower Street project is the No-Build Alternative and therefore Stower Street will not be connected through to Haynes Avenue as part of this project.

## Comment #5 continued

## Response

- Make Highland Park School crosswalks on both Stower and Comstock with all possible safety features and wide, and very visible with cross hatches.  
(Most of ours are painted sloppy, narrow, faded and don't show up.)
- At Highland School, develop an off-street kids loading area w/ a drive-thru loop. Make all pedestrian gates, entrances and exits to parking lots and loading zones on the side streets — not Comstock or Stower.
- Make the residential part of the Stower St. Project (So. Sewell to So. Sewall) the same width as the existing residential Stower — (So. Sewell to So. Montrose) to lessen the negative impact on property values (with a major street so close to houses and a church sanctuary).  
If there must be widening, do in commercial area and section across the pasture (So. Hayes to So. Sewell), not the residential area.
- FYI: I lived on Stower and So. Jordan in the 50's and 60's, and the traffic and noise were a problem — with out it being a through street and widened at the other end. At least, our

## Comment #5 continued

## Response

P.S. Re: So Hayes speed limit

Many drivers do not appear to know So. Hayes is a 35 mph zone. Traffic gets bogged-up with drivers at the 35 mph blocked by the 25 mph traffic. It's surprising there are not a lot of rear-end collisions.

There is only one 35 mph sign on southbound So. Hayes, and it's behind shrubbery at the car wash in the ACE parking lot. We need more signage, but don't need to chop down tree - just trim.

9. Comments noted.

Comment #6

RECVD MDTGLD APR 22 '03 AM 09:42

MASTER FILE  
COPY

RECEIVED  
MAY 14 2003  
COMMENT  
MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: \_\_\_\_\_  
Jodi Barsha  
208 N. Winchester Ave.  
Miles City, MT 59301

COMMENTS: \_\_\_\_\_  
I support this project and feel that it is vital for miles City's growth & prosperity, and for also enticing new business & industry to come to miles City

AST	RYE	MAIL ROUTE	COPY IN
		DISTRICT ADMINISTRATOR	
		CONSTRUCTION ENGR	
		ASST CONSTRUCTION ENGR	
		Eng Proj Mgrs	
		Eng Officer	
		MAINTENANCE CHIEF - CIVIL	

Response

Thank you for your comment.



# Comment #7

# Response

REC'D MTGLD APR 23\*03 AM 09:58

RECEIVED

MAY 14 2003

#6

ENVIRONMENTAL

MT Dept. of Trans  
Mr. Bill McChesney  
PO Box 890  
Glendive, MT 59330-0890

MASTER FILE  
COPY

RE: Stower Ave. Project in Miles City

Dear Sir:

I was born and raised in Miles City. My mother still owns our family home on Stower Avenue. As a result I am concerned about the proposed Stower Avenue project.

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Prol Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GRV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Miss Supv G.M.W		
		Shop Supv G.M.W		
		Sectionman G.M.W		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Agent		
		Traffic Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		District File		
		Bulletin Board		

April 21, 2003

Connecting Stower to Haynes Avenue is both sensible and inevitable. However, this connection will create problems which must be addressed before this project can be completed. The problems are threefold; Increased traffic, Increased traffic speed, and the resultant degradation to the residential neighborhoods which Stower passes through. The impact from this project will be felt along the entire length of Stower from the rail road tracks to its juncture with Haynes.

Both historically, and by design, Stower Avenue is a residential connector street. Stower is not now, nor should it become an arterial route. It is undeniable that traffic volume will increase when a connection is cut through to Haynes Avenue. This increased volume on Stower should be minimized by creating two new four way stops. One should be added between Strevell and the railroad, the other should be added between Strevell and Haynes (perhaps on Cale?).

The addition of these new four way stops would also slow down the inevitable increased traffic speed. Otherwise the increased speed will raise the risk of accidents to the neighborhood children, those with driveways onto Stower, and those using the streets which bisect Stower. The speed limit on Stower should remain at 25 mph ! The new traffic stops will enhance the chance of that limit being kept.

Finally, there is the more nebulous problem of residential neighborhood degradation. Mitigating the traffic volume, and the traffic speed, will be an important aspect to deal with this problem. Yet the physical project design should also reflect this concern. The existing large trees along Stower should be preserved. Designing the corners to extend into the street would not only slow traffic, it would also present a more friendly environment for the residents as they walk through their neighborhood.

Please address these concerns. Ensure that the project plan incorporates strategies to preserve the trees and residential character of Stower neighborhoods. Also ensure that your project is designed to minimize the increase in traffic volume. And for safety sake please utilize all design aspects which would keep the traffic flow at 25 mph or slower. Thank you for your assistance.

Sincerely,  
*Weldon J. Birdwell*  
PO Box 10, Billings, MT 59103

Thank you for your comment. See response to Comment #1

**Comment #8**

MDTGLD APR 23 '03 AM 09:56

MAY FILE #7

RECEIVED

MAY 14 2003

ENVIRONMENTAL

**MONTANA DEPARTMENT OF TRANSPORTATION**

**Comment Form**

Project: Miles City Urban EA Hearing  
 Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
 Control Number: 4361,4362,4363

OFFICE	MAIL ROUTE	COPY
	DISTRICT ADMINISTRATOR	
	CONSTRUCTION ENGR	
	ASST. CONSTRUCTION ENGR	
	Enr. Proj. Mgrs	
	Enr. Officer	
	MAINTENANCE CHIEF - GDV	
	MAINTENANCE CHIEF - MC	
	MAINTENANCE CHIEF - WP	
	Asst. Supv. G.M.W.	
	Supv. G.M.W.	
	Section Chief G.M.W.	
	ENGINEERING SERVICES ENGR	
	Design Supv	
	Materials Supv	
	Utility Agent	
	Traffic Engr	
	Right of Way	
	DIST ADMINISTRATIVE OFFICER	
	PERSONNEL SPECIALIST	
	Bulletin Board	

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 13, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: CLIFF F. BOUTELLE  
303 So. STREVELL MILES CITY, MT

COMMENTS: THESE ARE IMPROVEMENTS THAT MILES CITY HAS NEEDED FOR YEARS.  
THE STOWER STREET EXTENSION PROBABLY SHOULD HAVE BEEN MADE YEARS AGO WHEN THE HAYNES AVENUE BECAME THE MAIN ARTERY TO THE BROADUS HIGHWAY. NOW THE NEED IS GREATER THAN EVER. I BELIEVE THE STOWER EXTENSION SHOULD BE THE FIRST PRIORITY.

*Cliff F. Boutelle*

**Response**

Thank you for your comment.

See response to Comment #1

Comment #9

APR 29 10:39 AM FROM: MI DEPT OF TRANS - DIRECTOR'S OFFICE 406444/043 1-532 P.01/01 F-233

RECEIVED

MAY 14 2003

ENVIRONMENTAL

MASTER FILE COPY

ACT	RYE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Misc Suppl G M W		
		Shop Supv G M W		
		Electrician G M W		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Maintenance Supv		
		Plant Maint		
		Pavement Eng		
		Roadway		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		Public Affs		
		Bulletin Board		

#8

MONTANA DEPARTMENT OF TRANSPORTATION

Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890 by May 5, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Laurie Rontelle  
812 S. Sultan  
Miles City, mt - 59301

COMMENTS: I am in strong support of  
all three (3) Miles City STREET projects, and would  
hope all can be completed as planned in spite  
of "extreme minority opposition." I have lived in  
this area of Miles City for 51 yrs., and can see  
only positive results in completing projects at present time.

Response

Thank you for your comment.

See response to Comment #1

## Comment #10

Cecil Cain  
647 Woodford  
Missoula, MT 59801

3 May 2003

Jean Riley, P.E.  
Montana Department of Transportation

Re: STPU8009(2)

Dear Jean,

In the last few weeks, I have had to be in Miles City to help my mother deal with the loss of her husband of 58 years and my father of nearly the same number of years. I was born there and grew up there. For me, there is not a more wonderful town in the world. My parents' home is at 505 South Cale, just across the street from the church and a block from the Highland Park School. Imagine my surprise when I heard about the proposal to widen Stower Street, destroying wonderful neighborhoods like the one my parents live in.

After reading portions of the assessment, I can't believe it was ever printed. It is riddled with errors from ignoring a one-way street (Sewell) to wrongly located school entrances. The abundance of such errors may be symptomatic of incompetence or deception. In either case, conclusions based on the assessment must be as incorrect as the data.

The project seems nothing less than a solution searching for a problem. There is no traffic problem in Miles City. There never has been a traffic problem in Miles City. The majority of traffic is routed on Main Street. It is a highway. It always has been a highway. The traffic there only increases moderately following traditional work hours.

The only improvement worthy of consideration would be the installation of a traffic light at the intersection of Main and Strevell. Safety concerns would also suffer if the above project comes to fruition. Speeds are sure to increase with a wider roadway. Gone too will be the quiet intersections around the schoolyard. To disrupt beautiful neighborhoods by removing the trees, buying/taking easements and widening the pavement is antithetical to the very character of small community living for which so many of us long to live in again.

I can not believe the project has seen ink. The project is simply silly. I have tried to find a benefit in the project. One has not surfaced. If ever there has been a waste of taxpayer revenue, this is a prime example. Public officials have many better projects and issues to busy themselves with besides this one. Don't ruin my hometown.

Sincerely,

Cecil E. Cain

ENVIRONMENTAL  
MAY 05 2003  
RECEIVED

MASTER FILE  
COPY

## Response

1. Corrections to the Environmental Assessment including location of school entrances are presented in Section 4, Clarifications to the Environmental Assessment.
2. The installation of a traffic light at Main and Strevell may be considered by the City in future planning efforts, but is a separate element from the MDT proposed projects.
3. The Preferred Alternative for Stower Street is the No-Build Alternative; therefore there would be no changes to traffic patterns or neighborhood character.

See response to Comment #1.

**Comment #11**

RECVD MDTGLD APR 23 '03 AM 09:59

MASTER FILE #10

**MONTANA DEPARTMENT OF TRANSPORTATION**

**Comment Form**

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

DISTRICT ADMINISTRATOR
CONSTRUCTION ENGR
ASST CONSTRUCTION ENGR
Eng Proj Mgrs
Eng Proj Mgrs
MAINTENANCE CHIEF - GDV
MAINTENANCE CHIEF - MG
MAINTENANCE CHIEF - WP
Misc Supvl G.M.W
Shop Supv G.M.W
Sectionmen G.M.W
ENGINEERING SERVICES ENGR
Design Supv
Materials Supv
Utility Agent
Electric Engr
Right of Way
DIST ADMINISTRATIVE OFFICER
PERSONNEL SPECIALIST
District File
2-Unit Guard

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

**NAME AND ADDRESS:** Brad Carroll, Assistant Fire Chief  
Miles City Fire Department  
2800 Main Street  
Miles City, MT 59301

**COMMENTS:** I would like to begin by stating that I am strongly in favor of all of the above-mentioned projects. They will greatly enhance the community's appearance and most of all the safety of its citizens. I would like to comment specifically on the Stower Street project, but some of my comments apply to the other projects as well. I fully support the proposed 9-1/2 foot parking lanes and the 12-foot driving lanes. Anything less could delay the emergency response vehicles such as the ambulances and fire apparatuses. We have numerous narrow streets in the city now and we need to construct Stower Street in a manner that will plan for the future as well as focus on the best interest of public safety. I also feel that sidewalks need to be provided on both sides of the street. The location of the sidewalks may be adjusted to save some of the trees; but again for the safety of the citizens, sidewalks need to be provided. Too many people currently have to walk in the street, which is hazardous and unsafe. The combination of a wider street and sidewalks will indeed make a safer environment for pedestrians, the children and the church. In any view, wider is safer.

We must minimize the impact that traffic has on Comstock. To me, that traffic pattern is more deadly than the proposed traffic that might occur on Stower Street. Opening of Stower will reduce the traffic on Comstock and help alleviate the danger to the school children.

The greater good that can come from these projects surely outweighs any negative impacts to residential areas. Miles City needs to plan for the future and street improvements are an extremely important component of that planning.

Please consider the need for modern age construction as a priority. The City Council, City Engineer, Planning Board and Public Safety officials have endorsed this project for the betterment of the community. Delays for emergency response personnel would certainly be the case if this project is not and complete with sidewalks, 9-1/2 foot parking lanes & 12-foot driving lanes. Thank you.

*Brad Carroll*

**Response**

1. Thank you for your comment. See response to Comment #1.
2. Meeting the access and maneuverability needs of emergency response vehicles is one reason to provide wider lane widths as included in the proposed projects.
3. Sidewalks were originally considered for both sides of the street for all three proposed projects. Due to public comments, the Wilson and Strevell proposed projects now include sidewalks on one side of the street only.
4. MDT conducted additional traffic volume analysis subsequent to the public hearing. Section 4, Clarifications to the Environmental Assessment, includes the details of this analysis.

Comment #12

RECVD MDTGLD APR 23 '03 AM 10:01

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

MASTER FILE  
COPY

April 22, 2003

Bill McChesney  
Montana Department of Transportation  
PO Box 890  
Glendive, MT 59330-0890

Mr. McChesney,

I am writing in support of the Stower Project.

I feel that if Stower Street was made a through street it would cut down the traffic that goes by the used entrance to Highland Park School which is Comstock Street and would make it safer for the children as Stower Street is next to the fenced in area.

I also feel if completed it would completely cut out the traffic that the college kids have to contend with when trying to go from their dorms to their classrooms. Again making it safer.

I know that it is a change, but would give a good access to Haynes Avenue where the newer development is progressing.

I am sure it would be helpful for people living in Michels Addition and Southgate to access the downtown area.

Sincerely

*Ramona Christanson*  
2601 Wilson  
Miles City, MT  
59301

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Mice Supv G.M.W.		
		Shop Supv G.M.W.		
		Scaffolding G.M.W.		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Agent		
		Traffic Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		District File		
		Bulletin Board		

# 11

Response

Thank you for your comments.

See response to Comment #1.

# Comment #13

# Response

RECVD MDTGLD APR 23 '03 AM 09:59

MASTER  
CO.

## MONTANA DEPARTMENT OF TRANSPORTATION Comment Form

RECEIVED  
MAY 14 2003  
COMMENT #13

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

ACT	RTE	MAIL ROUTE	COPY	INC
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Project Engineer		
		Field Office		
		MAINTENANCE CHIEF - GOV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Area Supv - G.M.W.		
		State Supv - G.M.W.		
		State Inspr - G.M.W.		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Traffic Eng		
		Right of Way		
		CONSTRUCTION SUPERVISOR		
		PERSONNEL SPECIALIST		
		District File		
		MAIL ROOM		

12

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, Glendive, Montana 2003.

Please indicate your name, address and affiliation (if any) below. Your name, address and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Brent L. Christopherson, Fire Chief  
2800 Main Street  
Miles City, MT 59301

COMMENTS: I would like to begin by stating that I am strongly in favor of all of the above-mentioned projects. They will greatly enhance the community's appearance and most of all the safety of its citizens. I would like to comment specifically on the Stower Street project, but some of my comments apply to the other projects as well. I fully support the proposed 9-1/2 foot parking lanes and the 12-foot driving lanes. Anything less could delay the emergency response vehicles such as the ambulances and fire apparatuses. We have numerous narrow streets in the city now and we need to construct Stower Street in a manner that will plan for the future as well as focus on the best interest of public safety. I also feel that sidewalks need to be provided on both sides of the street. The location of the sidewalks may be adjusted to save some of the trees; but again for the safety of the citizens, sidewalks need to be provided. Too many people currently have to walk in the street, which is hazardous and unsafe. The combination of a wider street and sidewalks will indeed make a safer environment for pedestrians, the children and the church. In any view, wider is safer.

} 1.

} 2.

I support the idea of planting new trees and shrubs in the appropriate places. I would also like to express my support for the calming devices at the corners for parking and crosswalks. I support the installation of conduit for a possible traffic signal in the future at the intersection of Strevell and Stower. There may be a need for a traffic signal at that intersection in the future, and the conduit should be put in place while the initial construction is underway in order to avoid unnecessary work in the future.

} 3.

However, I do not support the idea of raising the intersections for speed calming. This would cause a strain on our Fire Department equipment and it would potentially create problems with plowing and sanding during the snow and ice of winter.

} 4.

Please consider the need for modern age construction as a priority. The City Council, City Engineer, Planning Board and Public Safety officials have endorsed this project for the betterment of the community. Delays for emergency response personnel would certainly be the case if this project is not and complete with sidewalks, 9-1/2 foot parking lanes & 12-foot driving lanes. Thank you.

1. Thank you for your comment. Meeting the access and maneuverability needs of emergency response vehicles is one reason wider lane widths are included in the proposed projects. See response to Comment #1.
2. Comment noted. Sidewalks were originally considered for both sides of the street for the proposed projects. However the Strevell and Wilson proposed projects now include sidewalks on one side of the street only subsequent to coordination with local residents. See response to Comment #1.
3. The City may choose to install a traffic light at Strevell and Stower at a future time, but this is not an element of the MDT proposed projects. See response to Comment #1.
4. Comment noted. Raised intersections are not included in any of the proposed projects.

Comment #14

Response

REC'D MDTGLD APR 21 '03 AM07:15

MASTER COPY

#13

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Engr Chief		
		MAINTENANCE CHIEF - CIVIL		
		MAINTENANCE CHIEF - HGT		
		MAINTENANCE CHIEF - WP		
		Miles Supr G M W		
		Engr Supr G M W		
		Sectionmen G M W		
		ENGINEERING SERVICES ENGR		
		Design Supr		
		Mileage Supr		
		Unit Engr		
		Engr		
		Bureau Engr		
		Bureau Engr		
		DIST ADMIN TRAINING OFFICER		
		PERSONNEL SPECIALIST		
		Bureau Board		

MONTANA DEPARTMENT OF TRANSPORTATION

Comment Form

Wilson ARRELL  
Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363  
SR OIL STOWER

You are invited to make your comments on this form and leave it with meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59301-0890, by May 14, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Tom W. Clarke  
1705 Stower St.  
Miles City, MT 59301

COMMENTS: I strongly support all 3 projects indicated above.

I know the Stower project has some controversey with it, so would like to particularly address it.

- 1) As Stower is opened up for through traffic from S. Haynes Avenue to downtown Miles City, it must not be allowed to become a truck route. I don't know if design can become a part of the effort to prevent that, but the City of Miles City needs to emphatically address this, perhaps with a specific ordinance.
- 2) The biggest concerns expressed have to do with the width and removal of trees, etc. Perhaps the City/MDT should work with the residents East of Strevell to work through that. Could it be that parking could be limited to one side of the street? Or in the alternative, a sidewalk on just one side?
- 3) Concerns have been expressed about a traffic increase. There will be some, but I would suggest the bulk of traffic that will come off S. Haynes at Stower are already going past my house West of Strevell. Folks are currently leaving S. Haynes onto Wilson or Comstock, coming to Strevell, then getting onto Stower for downtown.

These projects are good for the entire community of Miles City, and while they will change, to some degree, the neighborhoods they pass through, they should be built nonetheless. Please make an effort to work through the concerns of current oponents so the projects can be bid and constructed.

1. Thank you for your comment. See response to Comment #1 for the Preferred Alternative.





**Comment #16**

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

**MONTANA DEPARTMENT OF TRANSPORTATION**

**Comment Form**

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

	ASST. CONSTRUCTION ENGINEER	
	Eng. Proj. Mgr.	
	Chief	
	MAINTENANCE CHIEF - MC	
	MAINTENANCE CHIEF - WP	
	Misc. Supv. G.M.W.	
	Shop. Supv. G.M.W.	
	Sectionman G.M.W.	
	SERVICES ENGR.	
	Section Supv.	
	Materials Supv.	
	Utility Agent	
	Right of Way	
	DIST. ADMINISTRATIVE OFFICER	
	District File	
	Bulletin Board	

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890 by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Patricia Conley  
11 N. Stovell Ave  
Miles City, MT 59301

COMMENTS: I am very much in favor of  
making Stover Street a through street to  
Haynes Ave. Many schools have through streets  
running past them and the children are safe.  
A lot of neighborhoods have also been impacted  
by the development on Haynes Ave. and the  
streets are more traveled then they were  
before, but the citizens have accepted the  
changes for the good of the town.  
Times are changing and the town is changing,  
lets do what is best for many and not  
let a few change the focus.

**Response**

Thank you for your comment.

See response to Comment #1.

Comment #17

Response

RECORD MILEAGE FOR 28 VEHICLES

MAY 14 2003

MILES FILE  
COPY

#16

Bill, ENVIRONMENTAL

my COMPLIMENT TO YOU, THE  
FEDS, STATE, & PAT ROGERS  
FOR DEFENDING THE DESIGN  
& PROJECTS. ALSO IT WAS  
GOOD THAT (2) WEDHOLT &  
OBERLANDER, CITY COUNCIL  
WERE THERE. ALL & THE  
MAYOR SHOULD HAVE BEEN  
THERE TOO. THANKS GARY

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ENR PROJECTS		
		Enr Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Mech Supt. G.M.W.		
		Shop Supt. G.M.W.		
		Recd Supt. G.M.W.		
		ENGINEERING SERVICES ENGR		
		Enr. Supt.		
		Enr. Supt.		
		Enr. Supt.		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		Enr. Supt.		
		Enr. Supt.		
		Enr. Supt.		

TRANSPORTATION  
orm  
EA Hearing  
J 8006(1), STPL 3097A  
4362,4363  
this form and leave it with the  
Ill McCreshey, Montana  
ndive, MT 59300-0857 by May 15.

NAME AND ADDRESS: GARY CRIDLAND  
HM- 2804 SUDLOW BUSINESS 809 BRIDGE ST.  
P.O. BOX 1071, MILES CITY MT 59301

\* MUST INCLUDE - NO TRUCKS & PROPER SPEED LIMIT SIGNAGE

COMMENTS: I SUPPORT ALL THREE PROJECTS AS PREFERRED  
& PRIOTIZED AT LAST PUBLIC MEETING. HOPEFULLY  
DUL 3 CAN BE DONE SOON & AT SAME TIME. STOWER  
STREET IS THE ONLY LOGICAL LOCATION FOR AN  
ADDITIONAL TRAFFIC FLOW FROM DOWNTOWN TO  
ALL OF THE SE. AREA OF MILES CITY. THIS IS  
NOT A SHORT SITED & QUICK DECISIONS AND IS  
OBVIOUS THAT IT HAS BEEN PLANNED FOR  
DECADES (THAT EVENTUALLY STOWER WOULD GO THROUGH)  
WE NEED TO TAKE ADVANTAGE OF THE FUNDS  
TO BUILD A APPEALING SAFE STREET. GROUP OR  
INDIVIDUAL MEETINGS WITH THOSE PROPERTY OWNERS  
(WHO ARE IMPACTED) WITH POSITIVE SUGGESTIONS SHOULD  
BE INCLUDED IN FINAL DESIGN IF AT ALL POSSIBLE.  
NO TIME SHOULD BE WASTED ANY FURTHER WITH THOSE WHOSE  
OBJECTIVE IS STOPPING OR DELAYING THE  
PROJECTS. IT IS TIME TO PROCEED. DEBATE  
FOR BUILD OR NO BUILD IS OVER.

1. The proposed projects have been in the City's planning process for over ten years and a topic at several city council and planning board meetings that were open to the public. See response to Comment #1 for the preferred alternatives for the three projects.
2. The City and MDT met with adjacent property owners to discuss specifics of the conceptual design for the proposed Stower Street project and they held a meeting on August 19, 2003 to discuss this topic. See response to Comment #1.

#17

MONTANA DEPARTMENT OF TRANSPORTATION

Comment Form

Wilson Stravell Stower  
Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361, 4362, 4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: NATHY DOEDEN HC 46 Box 7451 Miles City 59301  
City/Co Planning Board, Preservation Commission, local business (Order Cost)

COMMENTS:

The Stower project obviously has some problems. I'd like to see the street go through, but would like to have the concerns of the property owners considered, as well as the long range plans for bike/pedestrian access to public areas like schools, churches, hospitals etc. Personally, I'd like to see the existing portion of Stower remain the same width, with the addition of sidewalks. This would 1) slow traffic & somewhat reduce it because some people could walk, not drive 2) Retain neighborhood ambience and 3) save money. The book Suburban Nation has some excellent examples and statistics in support of these suggestions.

Thank you for your comment. See response to Comment #1 for the preferred alternative.

# Comment #19

# Response

## MONTANA DEPARTMENT OF TRANSPORTATION Comment Form (18)

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Will Doran  
156 Wyttenhove Lane  
Miles City, MT 59301

COMMENTS: I am in support of the  
Stower street, Wilson Street, and  
South Strevell Street projects.

Will Doran

AGT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		

Thank you for your comment.

See response to Comment #1 for the Preferred Alternative.

Comment #20

Response

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

MASTER FILE  
COPY

#19

MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Charles Gus Glasscock  
520 E. Strevell  
Miles City, MT. 59301

COMMENTS: My wife and I purchased our house late  
summer '02. Dorothy Armstrong laid out the street project  
to us ... we are rancher-farmers; in other words  
always optimistic [ "Naah, this will never happen" ...  
our thoughts re. Stower ] Well, it could happen.  
I do have thoughts, concerns, and questions  
#1 - I read the E.A. and some things  
jumped out at me. Will Stower be widened } 1.  
All the way to Main St ?  
#2 With anticipated heavy traffic by 2022  
is the roadbed and design for that amount } 2.  
of traffic adequate?  
#3 What about heavy trucks? I see } 3.  
projections of quite a few each day.  
#4 Will this be a thru street with no } 4.  
stop signs?  
#5 Property values ... if property values decline } 5.  
will property owners be compensated?

1. Thank you for your comment. The Build Alternative for Stower Street includes widening the existing Stower Street from Strevell to Sewell Avenues, as described in Chapter 2 of the Environmental Assessment. However, due to the potential for increases in traffic with the proposed improvements to Stower Street and the public controversy surrounding those increases, MDT and FHWA selected the No Build Alternative for Stower Street.
2. The design of the roadbed would accommodate any additional future traffic volumes.
3. For the Build Alternative, freight truck traffic would be deterred from using Stower Street through the posting of vehicle weight limits, which would be enforced by the City. The streets would continue to be open to general traffic, up to a certain weight limit, which would include single unit trucks (such as delivery and trash trucks).
4. The Build Alternative for the Stower Street project specifies that existing stop signs along Stower Street would remain, including the four-way stop at Stower and Strevell. Under the Preferred Alternative for Stower Street, which is the No Build Alternative, the existing stop signs would also remain.
5. The impact of the proposed projects on the value of adjacent properties is discussed in the Section 4, Clarifications to the Environmental Assessment.

**Comment #21**

**Response**

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

**MONTANA DEPARTMENT OF TRANSPORTATION**  
**Comment Form**

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009  
Control Number: 4361,4362,4363

MAINTENANCE SUPERVISOR	
FINANCE CHIEF - MC	
Mica Supv. G.M.W.	
Shop Supv. G.M.W.	
Sectionmen G.M.W.	
ENGINEERING SERVICES ENGR	
Design Supv	
Est Supv	
Utility Agent	
Traffic Engr	
Right of Way	
ADMINISTRATIVE OFFICER	
PERSONNEL SPECIALIST	
District Eng	
District Eng	

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890**, May 16, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Eleanor N. Gray  
220 So. Merriam Ave.  
Miles City, MT 59301

COMMENTS: I am in favor of extending Stover St. to  
Haynes Ave, and further east beyond Haynes.  
Miles City has needed this street extension for many  
years. Now is the time to do it.

Highland Park school sits north of Comstock St. and  
Lincoln School is immediately north of Pearl Ave, with  
no special problems. Having Stover St. run by the  
Highland Park playground should not be a problem.

Thank you for your comment.

See response to Comment #1.

Comment #22

Response

RECEIVED

MAY 14 2003

ENVIRONMENTAL

MONTANA DEPARTMENT OF TRANSPORTATION

Comment Form

Project: Miles City Urban EA Hearing
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)
Control Number: 4361,4362,4363

Table with 2 columns: Job Title (e.g., Eng. Officer, Maintenance Chief, Shop Supv) and a grid for initials/signatures.

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Betty Greenfield
404 Moorhead apt 3
Miles City, mt 59301

COMMENTS: I am strongly in support of Stower St extending into Laines ave. The street I live on has a "steady" flow of traffic Morning Noon, and Night. and it would relieve my narrow little Street of the heavy use it gets now. Please consider the need of others when you go forth with this project. We need a good wide Street w/ Curbs & Sidewalks with a "Stop Sign" or two along the way. Thank you Betty Greenfield

Thank you for your comment. See response to Comment #1.



Comment #23

Response

REC'D MDTGLD APR 28 '03 AMUJDL

MILES COMMUNITY COLLEGE

Home of the Pioneers

#22

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

April 24, 2003

Bill McChesney  
Montana Department of Transportation  
P.O. Box 890  
Glendive, MT 59330-0890

Dear Mr. McChesney:

ACT. THE  
PLANNING  
DISTRICT  
CITY MANAGER  
CITY CLERK  
ASST. CITY MANAGER  
ASST. CITY CLERK  
ASST. CONSTRUCTION  
DIR. POLICE  
DIR. FIRE  
MAINTENANCE CHIEF - G.D.  
MAINTENANCE CHIEF - M.A.  
MAINTENANCE CHIEF - W.L.  
MBA SUP. G.M.N.  
STUD SUP. G.M.W.  
SCHEDULING G.M.W.  
ENGINEERING SERVICES ENG.  
Design Supv  
Materials Supv  
Utility Asst  
Trains Eng  
Flight of Way  
DIST. ADMINISTRATIVE OFFICE  
PERSONNEL SPECIALIST  
District File  
Bulletin Board

MASTER FILE COPY

Thank you for allowing written comments about the Miles City Urban EA Hearing that is dealing with the **Stower Street project**. Because you had changed the hearing date, I was not able to attend and testify at the rescheduled hearing. However, I would like to include this letter as my comments. Miles Community College **strongly supports** the Stower Street project for a variety of reasons.

*Reason 1:* As you may know, Stower Street runs parallel to Dickinson Street on which the College is located. Many people in Miles City have historically used Dickinson as a through street to connect to Main Street, Moorehead, Winchester/Cale, or Haynes. The portion of Dickinson that connects to Moorehead and Sewell actually belongs to Miles Community College, but we have allowed Miles City to use it as a street, and they have been gracious enough to maintain it for us. However, we are currently developing a facilities management/campus master plan that will ultimately take the College's portion of Dickinson out of circulation. Because we are currently constructing a new student housing facility, we have blocked off Dickinson, from Moorehead to Sewell Avenue. Although the City has been very kind about providing the appropriate blockades, we have had people—amazingly enough—who have driven over our lawn and on our sidewalks to get to our parking lot in order to continue their journey through Dickinson. This has created some potentially dangerous situations for our students. Once we take back our portion of Dickinson, we foresee continuing challenges with traffic unless Stower Street goes through.

*Reason 2:* Although we have not made the acquisition of any portion of the property that borders Stower Street, we feel that if Stower Street goes through, the College will potentially gain a "front door," which we currently do not have. Having Stower Street as a through street will only enhance the College's ability to gain greater access to a main artery.

*Reason 3:* When I first arrived at Miles Community College in July 2001, Mayor Metzberg and I visited about the College and the direction of our campus plan. One of the main issues we discussed was "Lake Dickinson," a phenomenon that happens on the corner of Dickinson and Sewell each time we have a serious rainstorm. Since the drainage system is not adequate, that particular corner becomes a huge lake—thus, the inference to "Lake Dickinson." Last year, the water seeped into the lower level of our student housing facility and caused some damage. Mayor Metzberg told me—and it has since been confirmed a couple of times by the Mayor and other city officials—that the Stower Project will take care of our lake front property because this project and peripheral city projects will increase the drainage capability and reroute the directional flow, thus eliminating the Lake Dickinson.

Bottom line is this: Miles Community College supports the Stower Street project because we feel it will have a positive effect on our current and future campus master plan. If you have additional questions or need us to make positive comments regarding this project, please let me know.

Sincerely,  
*Darrel L. Hammon*  
Darrel L. Hammon, Ph.D.  
President

"Start Here...Go Anywhere"  
2715 Dickinson Miles City MT 59301 (406) 234-3031 Fax (406) 234-3598

1. Comments noted. See response to Comment #1 for information on the preferred alternatives for the three projects.
2. Comment noted.
3. Comment noted. The preferred alternative for Stower Street is the No-Build Alternative which does not include any drainage improvements.

## Comment #24

**RECEIVED**  
MAY 07 2003  
**ENVIRONMENTAL**

M. MELISSA HARTMAN  
122 Balsam Drive, Miles City, MT 59301  
406/232-0360

May 2, 2003

Mr. Bill McChesney  
Montana Department of Transportation  
P.O. Box 890  
Glendive, MT 59330

Dear Bill:

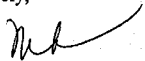
I am writing in support of the three urban street projects for Miles City which will be paid with federal and state funds. Those three projects are Wilson Street, Stower Street and South Strevell Avenue. All three projects NEED to be done and as long as federal and state funding is available, now is the time for them to be accomplished. } 1

Of all three the Stower Street project will have the biggest impact in changes. However, with the additional federal and state funding this project will create a safer, wider thru-street. Development of the Kosty property IS going to happen so now is the time for this street to be developed properly and be safer. The newer, developed street will be a benefit for Miles City - a benefit that we need. I realize there is a school and a church located on this street, but as a comparison so is another school and two churches in Miles City located on a busy thru street namely Montana Avenue (Presbyterian Church, Sacred Heart Church and Sacred Heart School, Sacred Heart Parish Center and the Ursuline Convent). } 2

As the news article stated South Strevell will be dropped if there is not enough funding remaining after the Wilson Street and Stower Street projects. I do hope if that does occur that the South Strevell project will be priority one when additional funding is available. It seems traffic on this street is increasing and foot and bike traffic is always present. This street is narrow with no sidewalk. When cars are parked on the west side it is very difficult to walk or be on a bike safely. } 3

Thank you for giving me the opportunity to express my opinion.

Sincerely,



M. Melissa Hartman

cc: Jean A. Riley, PE, Engineering Section Supervisor  
Montana Department of Transportation  
P.O. Box 201001  
Helena, MT 59620-1001

MASTER FILE  
COPY

## Response

1. Thank you for your comment. See response to Comment #1 for information on the preferred alternatives for these three projects.
2. Thank you for your comment. See response to Comment #1.
3. The increased width of South Strevell and the addition of the new sidewalks under the proposed project would assist in improving access, movement and safety for pedestrians and bicyclists and would meet the needs of "Improving Safety" and "Improving Roadway Deficiencies," as identified in Chapter 1 of the Environmental Assessment.

Comment #25-A

Response

MONTANA DEPARTMENT OF TRANSPORTATION (#24)  
Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: DON and ELEANOR HARTMANN  
2211 STOWER STREET  
MILES CITY, MONTANA 59301

COMMENTS: We have owned our home (at the above address) for 35 years. We would be severely impacted by the Stower St. project, as would everyone living on Stower. Among our many concerns - the safety impacts on the Lutheran Church & also on Highland Park School are among the main ones. No one on Stower wants the street turned into an alternate route for Main Street. A lot of the traffic already exceeds the speed limit, and widening the street would only make it a more convenient "race track" for those wishing to use it as such. All of Stower Street - including West of Stowell - is one of the prettiest residential streets in Miles City. What kind of an impact would this project have on the property values of the homeowners? Do the Main Street business owners want the traffic re-routed away from them? I'm sure not - yet this is what would happen if this project were to go through. Thank you -  
Don & Eleanor Hartmann

1. Thank you for your comment. The preferred alternative for Stower Street is the No-Build Alternative and therefore existing conditions would not change.
2. The impact of the proposed projects on the value of adjacent properties is discussed in the Addendum.
- 2-b. Comments received on the Environmental Assessment, including business owner comments, are presented in this Appendix.

Comment #25 -B

**ENVIRONMENTAL**

R.G. - STPU 8013 (1)

Wilson street in  
Mills City

Jean Riley - P.E.  
MDT Envir. Services

Helena, Mt. 59620

May 2, 1903

**MASTER FILE  
COPY**

Dear Ms. Riley -

3. We are writing to endorse the Wilson St. project for the city of Mills City. It is our feeling that it is an important step for the improvement of our city. It will improve the access to our Medical Center which serves not only our own community, but all of Eastern Montana

4. Also, we believe a large improvement could be made if a traffic light could be installed at the intersection of Haynes and Wilson. It would help the people utilizing Wilson street and would have a downstream effect of allowing people to access Haynes Avenue from Sudlow, Tompy and Cornstock more easily. The signage

Response

3. Thank you for your comments on the Wilson Street project.

4. The installation of a traffic light at Haynes and Wilson may be considered by the City in the future, but is not included as an element of the MDT proposed projects.

Comment #25-B cont.

5. } for the Hospital needs to be im-  
proved, as the small sign which  
is there now, is hard to see.  
We were not at all pleased with  
the job done on the Environmental  
Assessment. It would probably more  
accurately reflect conditions for the  
Wilson Street and the Stowell Avenue  
project (S7PU 8006 (1) if these two  
projects were separated from the Stower  
Street project. The Stower Street  
project has significantly different  
impacts. There seems to be overall  
support for these two projects.  
Therefore, would it be feasible for  
final plans be developed on them  
at the same time you are doing the  
required revisions on the Stower  
Street project - to more accurately  
reflect existing facts and impacts.  
6. } The impacts of the Stower Street  
project are different and much more  
severe than on either the Wilson  
Street and Stowell Street projects.

The Environmental Assessment on  
these two projects should be con-  
sidered separately from the Stower  
Street project.

Thank you for your time and  
consideration.

Sincerely,  
Dora Eleanora Hartmann  
2211 Stower Street  
Miles City, MT. 59301

Response

5. Your suggestion for improving signage in the vicinity of the hospital, though not included as part of this project, is noted and will be forwarded to the City.
6. Please refer to Section 4, Clarifications to the Environmental Assessment, for additional traffic analysis for Stower Street and for updated information on the proposed projects. The three proposed projects were documented in one Environmental Assessment in an effort to provide a more streamlined process for the documentation of projects of similar scope and relative magnitude. MDT views the proposed projects as connected or related actions, because the projects include similar design features and are elements of the larger effort to consistently upgrade urban streets to MDT standards.

## Comment #26

Dear Ms. Riley:

The record shows substantial opposition to the Stower Street construction proposal, for completely valid reasons. This has been a quiet residential neighborhood since Highland Park subdivision was platted in 1910. Local residents and home-owners have a reasonable expectation that Stower Street remains quiet and free from the noisy, hazardous traffic that accompanies a principal route.

The proposal should not be lumped with other projects – it will clearly have far greater impact than the Wilson Street/Strevell proposals. The environmental assessment for Stower Street is inadequate and in some instances, inaccurate.

My comment with exhibits is attached.

Very truly yours,

*Gary W. Huckins*  
Gary W. Huckins

### SUMMARY AND CONCLUSIONS:

This proposal will indeed facilitate cross-town traffic flow. So much that we predict it will actually create an urban highway, including substantial heavy truck traffic, through a quiet residential area, past an elementary school and a church. The Environmental Assessment (EA) does not address this prospect. The EA omits such essential matters as statistical accident projections, projected noise levels, air quality degradation and the health risk to school children and local residents. There is no plan specified to add controlled intersections (beyond painting cross-walk lines), traffic lights, or any other safety and traffic control measures appropriate for the level of traffic which will likely result. This is an ill-conceived plan that should be rejected in favor of the No Build alternative.

Explanatory comments and maps of the city and the surrounding area follow.

### TRANSPORTATION ROUTES:

Three highways pass through Miles City: Highway 12, Highway 59 and Interstate Highway 94. The interstate highway has three exits, one west of the city approximately three miles and the second further east at the intersection of I-94 with Highway 59 south (Haynes Avenue/Main Street in the city). The third exit is far east of the city and has no bearing on this project. Traffic to/from Highway 59 north of the Yellowstone River has limited options because there is only one bridge across the river to link the north to highway routes south, east and west. This traffic must go through the city.

The city is bisected by an east/west Burlington Northern-Santa Fe Railway track; there is one underpass with 11 ft – 5 inches clearance on Main Street. Adequate height for passenger cars and small vehicles, but too low for most heavy trucks. There are also several signal/barrier controlled railroad crossings; e.g., Eighth St. and Tenth Street. Heavy trucks are routed around the Main Street underpass through the city and across the tracks at Tenth St. along a designated truck route, by-passing the downtown Main Street. The truck route is curved, complicated by inconvenient intersections, and circuitous.

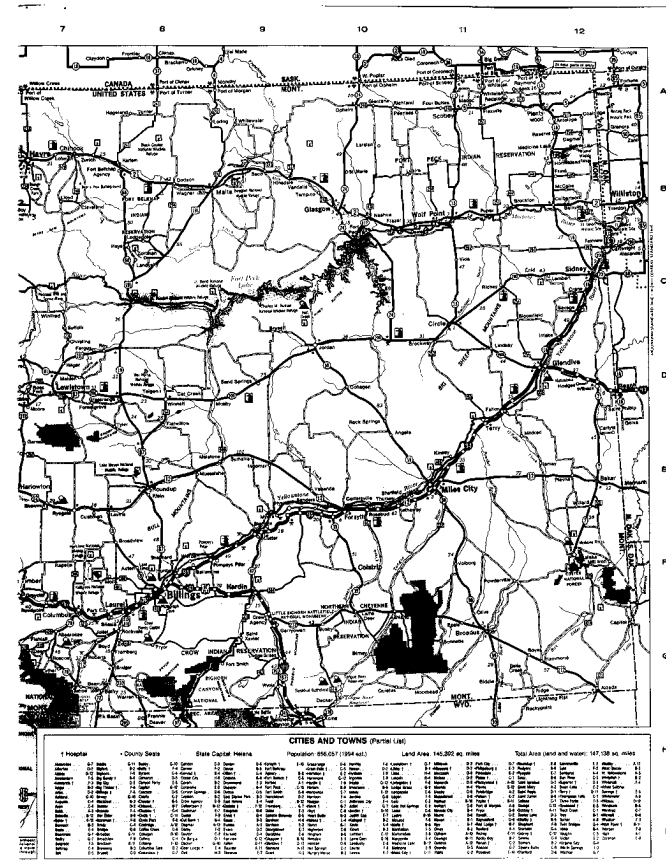
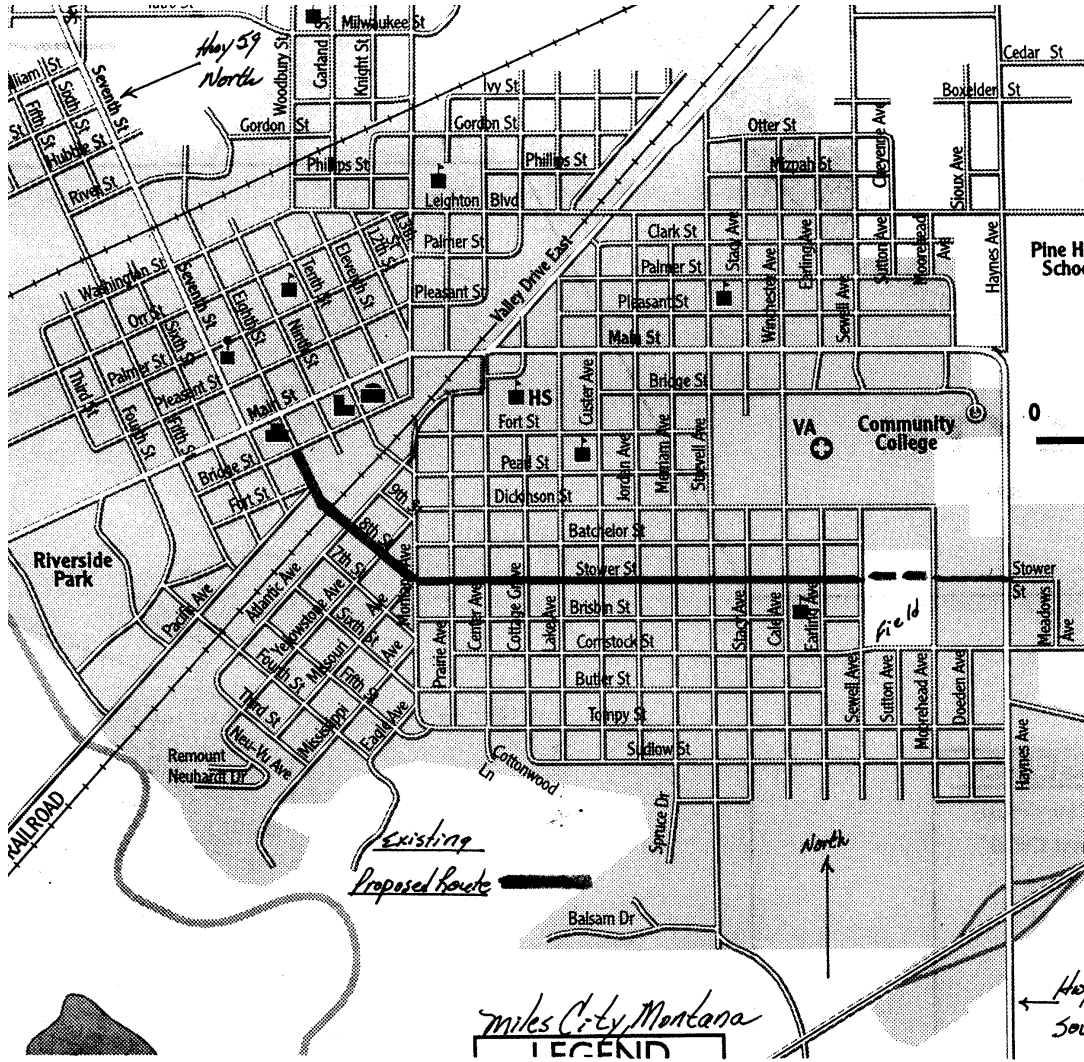
The enclosed map of the existing truck route and the proposed Stower Street link reveal the difference at a glance. Stower Street is a direct, nearly straight cross-town route to Haynes Avenue and the I-94 interchange; far more convenient than the existing complex truck route.

## Response

1. Thank you for your comments. See response to Comment #1
2. Please refer to Section 4, Clarifications to the Environmental Assessment for additional traffic and noise analysis.

Due to potential increases in traffic with the proposed improvements to Stower Street and the public controversy surrounding those increases, MDT and FHWA have selected the No Build Alternative for the Stower Street project. See response to Comment #1

Comment #26 cont.



## Comment #26 cont.

It is a logical conclusion that heavy trucks will prefer the Haynes Avenue/ Highway 59 and I-94 interchange. That is the only location in the city with truck stops. Truckers routinely operate day or night to meet delivery schedules; two truck stops at this interchange offer 24 hour refueling and truck parking. This location also offers convenient access to restaurants, motels, the Interstate highway, and Highway 59 south.

City officials state that there is no plan to designate Stower St. a truck route. That is immaterial; most people – especially truck drivers - will elect to use Stower St. for ease and convenience. The EA projects that future traffic will be evenly divided between Main Street and Stower Street. We do not accept that projection; a realistic projection is that 99% of the heavy truck traffic will opt for the easy way, following Stower Street. It is immaterial whether it is officially designated.

Therefore, the following items from the Environmental Assessment should be carefully examined and corrected:

Traffic count projections, especially heavy trucks.

Noise level projections, especially heavy trucks.

Air quality – there are substantial emissions from diesel truck engines.

Statistical Accident projections – the EA does not address this question. Most of the intersections along Stower Street are uncontrolled and the EA reveals that it is already accident prone. Added traffic will certainly result in more accidents.

These items require further comment (below).

### TRAFFIC DATA:

Personal observation leads to the conclusion that traffic counts are substantially different in the four block segment of Stower Street east of Strevell Avenue toward Sewell Avenue, when compared to Stower Street between Strevell Avenue and west to Main Street. The four-block segment proposed for re-construction is a very quiet street for the reason that it is not a thru street.

The MDT count of 2,370 vehicles ADT seems much too high. The time, date and locations of MDT traffic counts cited in the Environmental Assessment should be specifically stated. If the traffic counts used in the EA were not taken within the four-block segment (the proposed project) at a representative time and place, new counts should be taken to insure accuracy. As noted in the EA, traffic data is scarce; accurate results depend on accurate traffic data.

See next section (noise levels) for further comment on traffic data.

## Response

3. Please see Section 4, Clarifications to the Environmental Assessment for additional traffic and noise analysis. Also refer to the response for Comment #1 for the Preferred Alternative for Stower Street.

4. Additional information on traffic counts was compiled by MDT subsequent to the public hearing and is described in Section 4, Clarifications to the Environmental Assessment



## Comment #26 cont.

### NOISE LEVELS:

Accurate noise level analysis depends on accurate traffic count data; it is not satisfactorily established that the traffic counts used in the EA are valid for the Stower Street segment proposed for re-construction. The ADT seems much too high for this quiet neighborhood. My personal observation is that a more accurate count would be one heavy truck every two months and one UPS delivery per week in my block. Truck traffic is definitely not a daily or hourly occurrence.

In any case, at least one of the stated assumptions – a 56 ft. setback to residences – is certainly not correct. This neighborhood was surveyed and platted in 1910; it was customary to create 25 ft. wide lots – 31 ft. width at the corners of intersections. At least one residence sits on two lots with only 56 ft. total width. It is clearly impossible that there is a 56 ft. setback distance; a casual inspection would disprove that assumption.

Another personal observation is that some noise level readings were recorded on Sewell Avenue; it is not clear that is the correct approach to assessing the Stower Street project.

This section of the EA seems to be fatally flawed in its preliminary conclusions. Great care should be taken to avoid violation of State and Federal statutes.

### AIR QUALITY:

The segment of Stower Street proposed for re-construction is definitely a low traffic street; vehicle emissions are not noticeable. A major high-traffic route will cause substantial degradation of air quality; it is a fact that vehicle emissions cause air pollution. There will therefore be an adverse health effect for residents and school children along the street and that is not progress.

According to the EA, the result is not illegal, but it is not a good idea.

### STATISTICAL ACCIDENT PROJECTIONS:

MDT accident analysis suggests that Stower Street is accident prone, but does not specify accident locations. It is unlikely all of the accidents cited occurred in the four-block segment of proposed re-construction; it is a certainty that none of the accidents were in the open pasture where no street exists.

Personal observation leads to the conclusion that the Stower Street/Strevell Avenue intersection is the most likely site. It is a busy intersection without a traffic light. None of the intersections east of Strevell Avenue along Stower Street have stop signs. Sight distance is adequate; e.g., the Highland Park School playground is open, without visual obstructions for more than a block south of Stower Street; every corner of the church property has an unobstructed view. Simply painting the curb to prevent vehicle parking could provide additional sight distance at key points such as intersections.

## Response

5. Additional work on the analysis of noise impacts associated with the Stower Street proposed project was conducted since the public hearing and is summarized in Section 4, Clarifications to the Environmental Assessment. Also, see response to Comment #1
6. A degradation of air quality in and around the vicinity of the proposed projects is not anticipated to result from either the Build or No Build Alternative for the proposed projects. First, Miles City is not a designated non-attainment area for air quality. Furthermore, the increased volumes of traffic forecast for Stower Street are not anticipated to result in a decrease in level of service. The overall air quality for the Build Alternative will be similar to the No Build Alternative because the number of vehicle trips and level of service will be the same. Also, see response to Comment #1
7. Specific information related to accidents is typically not included in public documents to protect the privacy of those involved in the accidents. Details on the causes of specific accidents may be available upon request by contacting the City. Also, see response to Comment #1

## Comment #26 cont.

Personal experience at Stower Street intersections points to careless driving as the most likely cause of accidents. For example, Sewell Avenue is clearly marked with one-way signs pointing south but vehicles can be observed traveling the street the wrong way every day. Construction will not prevent icy winter driving conditions.

Driveways entering the street cannot be changed, there are already curb cuts. Many residents have garages in the alley behind the houses and all services follow the alley route. Unless on-street parking is prohibited, it is difficult to see how entry/exit will be changed; except to observe that as traffic volume increases, so does the potential for accidents – that's not an improvement.

The EA incorrectly states that there is insufficient width for two vehicles to meet – my personal experience contradicts that statement. Additional room would be necessary for large heavy trucks, however. It is interesting to note that this four block segment of Stower Street is to be widened to 42.7 ft. curb-to-curb; however, the Strevell Avenue project will merely be widened to 33.3 ft. total width. Testimony at a public meeting disclosed that MDT acceded to the request of Strevell Avenue property owners to eliminate sidewalks on one side of the street.

### DRAINAGE DETENTION POND:

A street drainage pond is planned; the pond will be situated at the intersection of Stower Street and Sewell Avenue across the street from several houses. This location is also a half block south of the Miles Community College (MCC) dormitories and one block south of the VA nursing care facility. MCC and VA buildings are frequently used as public meeting sites by government agencies and for other community events – visitors from a wide area attend the meetings. Students and staff members are naturally present on a daily basis.

A brochure from the Epidemiology Section of the Montana Department of Public Health and Human Services with a description of West Nile Virus (WNV) is enclosed. Briefly, West Nile Virus disease is an animal borne organism transmitted by mosquito bites; the disease has reached Montana. According to the brochure WNV is a severe risk, sometimes fatal, for elderly persons, the typical patient in the VA nursing home. It is uncomfortable but less likely to be fatal in younger persons.

According to MDT testimony at a public meeting on the Stower Street project, the drainage pond will collect and hold standing water; mosquitoes hatch from eggs laid on standing water. The West Nile Virus brochure states that “mosquito populations can be reduced...in your neighborhood by eliminating standing water that collects in ...unused pools”.

The drainage detention pond would be an unacceptable public health hazard.

## Response

8. Comments noted. See response to Comment #1

9. The detention pond included as an element of the Stower Street Build Alternative would be located at Stower and Sewell and would be designed to be similar to the existing pond just north of the Haynes/Stower intersection. The detention pond would fill with stormwater during and after heavy storms. It would not be a holding place for water on a continuous basis. The No Build Alternative, which is the Preferred Alternative for Stower Street, does not include a detention pond.

# Comment #26 cont.

## Personal Precautions

To reduce the annoyance of mosquito bites and prevent transmission of mosquito borne infections, a few common sense measures should be followed.

These include:

- Avoid shaded areas where mosquitoes may be resting
- Limit evening outdoor activities when mosquitoes are most active
- Wear protective clothing such as long sleeved shirts and pants
- Use insect repellents that contain 20-30% DEET can be effective in preventing insect bites. Read the repellent label for the manufacturer's usage recommendations.

Finally, mosquito populations can be reduced on your property and in your neighborhood by eliminating standing water that collects in unused birdbaths, boats, buckets, tires, unused pools, roof gutters and other containers.



1 of this public document were published at an estimated cost of 47¢ per total of \$470.00 which includes \$470.00 for printing and \$0.00 for distribution.

## West Nile Virus Summary

- West Nile virus was first identified in the U.S. in 1999 in New York City and has since spread to 27 states.
- West Nile virus has not been identified to date in Montana but the range of the virus has spread rapidly since it was first discovered in the U.S.
- Mosquitoes transmit the virus by feeding on infected birds then biting people.
- Most people infected with West Nile virus develop mild symptoms such as headache, fever, muscle pains and neck stiffness. More severe infections can cause disorientation, convulsions, coma, or death, particularly in elderly persons.
- Bird mortality in species such as crows can be an early indication of West Nile virus activity.

Note: (WNV has reached Montana)



W

## Montana Department of Health & Human Services

For more information

<http://www.cdc.gov/ncidod/dvbid/westnile>

Epidemiology Section  
1400 Broadway C 216  
Cogswell Bldg  
Helena, MT 59620  
Phone: 406 444 0273  
Fax: 406 444 0272



Epidemiol

Tel: 406-

Cover photo by Maria/Boonma CA Mosquito & Vector Control District

## VISUAL IMPACT:

Stower Street is a very quiet and pleasant residential neighborhood. The homes show considerable pride of ownership; they are well maintained and nicely landscaped. Numerous mature trees provide a pleasant view and welcome shade during the summer. The yard at 2211 Stower was featured in a front-page newspaper article last year – for award winning landscaping - many mature trees would be removed there and along the street.

The open field serves as a pleasant vista and a buffer from the noisy, busy commercial nature of Haynes Avenue at the east end of Stower Street. Two horses graze there during the summer; it remains an agricultural property. It is park-like, though it is private property.

Tearing out trees and paving pasture would be a profoundly unfavorable impact.

## Response

10. The text in the Environmental Assessment describing the visual impacts associated with the proposed projects has been revised and is included in Section 4, Clarifications to the Environmental Assessment. For Stower Street, the No Build Alternative has been selected as the Preferred Alternative and therefore there would be no changes.

10

**Comment #27**

REC'D MDTGLD APR 22 '03 AM 09:42

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

**MASTER FILE  
COPY**

#26

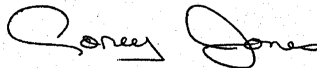
April 19, 2003

Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

Dear Mr. McChesney:

Haynes Avenue is the commercial hub of Miles City. Stower Street is the obvious access to shopping for citizens of Miles City. It is reasonable to be progressive in planning for the future growth of this community.

I strongly support the Stower project and the proposed access to shopping in Miles City.



Corey Jones

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgr		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Miles Supt - G.M.W.		

**Response**

Thank you for your comments. See response to Comment #1.

**Comment #28**

RECVD MDTGLD APR 22 \*03 AM09:44

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

MASTER FILE  
COPY  
#27

215 Ponderosa  
Miles City, Montana 59301  
April 19, 2003

Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

Dear Mr. McChesney:

My family resides in Southgate and my daughter attends school at Highland Park. We strongly support the Stower Project, which allows access through to Haynes Avenue.

The negative response indicates that Highland Park School children will be endangered. I disagree! Stower not only has a fenced playground facing the street; the children congregate throughout the day in the Comstock Street area which is now the only reasonable access to Haynes avenue. The Stower Project will relieve heavy traffic on Comstock and reduce the risk to children at Highland Park School. The argument that the Stower Project endangers students is indefensible.

The Stower Project is reasonable, practical and long overdue. Thank you.

*Janette Jones*  
Janette K. Jones

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Misc Supv G.M.W		
		Shop Supv G.M.W		
		Sectionmen G.M.W		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Agent		

**Response**

Thank you for your comment. See response to Comment #1.

## Comment #29

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Janet R Kelly  
602 S Strevell Avenue  
Miles City MT 59301

COMMENTS: My comments are attached to this form.

**Comments of Janet R. Kelly  
602 S. Strevell Avenue  
Miles City MT 59301  
Miles City Urban EA Hearing  
Project No. STPU 8009(2), Stower Street  
Control No. 4363**

My comments are restricted to the Stower Street Project.

The EA understates the "anticipated effects" of the Stower Street project to the property owners within the existing neighborhood. Stower Street residents will experience significant negative impacts to the existing "natural, physical and social environment". This project will turn Stower Street into the City's primary route for east-west traffic, thereby creating significant and long-lasting increases in noise and traffic volume. The existing quiet residential neighborhood environment will disappear, and will be replaced by a wide, highly trafficked major thoroughfare.

The EA's rationale in supporting the Stower Street project is that "localized impacts often occur in order to benefit the community as a whole". I do not find substantive data to justify the rationale. Is the benefit of moving the same number of across town people faster worth the cost of sacrificing a neighborhood, diminishing property values and increasing the likelihood of traffic accidents? Census data confirms that Miles City's population has remained constant throughout the 1990's. I have attached a copy of census data that confirms this fact. The 1990 census figure for Miles City is 8621; the 2000 census figure is 8487. Several studies conclude that wider streets increase the likelihood of traffic accidents. Some statistics suggest that property values are inversely proportional to street width.<sup>1</sup>

### Improving Safety (page 6)

I do not agree that this project improves safety by widening the street, and adding two parking lanes. These comments seem appropriate to justify a project for a commercially-zoned street, and not a neighborhood street project. I agree that a wider street will enhance the vehicular traffic flow; however, unimpeded traffic flow is just another name for increased speed. The EA justifies widening the street with two parking lanes to meet

<sup>1</sup>Andres Duany, Elizabeth Plater-Zyberk and Jeff Speck. Suburban Nation: The Rise of Sprawl and the Decline of the American Dream, Peter Swift, "Residential Street Typology and Injury Accident Frequency," 2000, p 78.

## Response

1. Thank you for your comments. See response to Comment #1. The statement regarding "localized impacts" has been stricken from the text as noted in Section 4, Clarifications to the Environmental Assessment.

Due to the potential increase in traffic with the proposed improvements to Stower Street and the public controversy surrounding those increases, MDT and FHWA have selected the No-Build Alternative.

2. Response provided on next page.

## Comment #29 cont.

current design standards, but wider streets are designed for the sole purpose of moving vehicles through them as quickly as possible. The top priority of the Stower Street Project is moving cars faster across town; pedestrians, safety, and residents in this neighborhood are put in second place.

2 cont.

Peter Swift's, Longmont Colorado study concluded that auto accidents correlated most closely with street width. New 36 foot wide streets are about four times as dangerous as traditional 24 foot wide streets. The study concludes that the most lethal streets are those that most closely match the suburban engineering ideal: arrow-straight, long and wide, with a free flow of light traffic. The rationale for the wider street is to improve visibility, intended to provide greater safety by allowing driver to see farther in front of them; but the result is that drivers feel more comfortable driving at higher speeds, making walking all the more dangerous. Cars will travel faster, while pedestrians and school children will now have to cross a wider street and the risk of accidents will increase.<sup>2</sup>

### 3.1 Effects on the Transportation System (page 18)

The EA is correct in its statements that "[T]he total sum of traffic in Miles City is not anticipated to increase due to the construction of the proposed projects." The only street negatively impacted is Stower. Stower traffic volumes will increase substantially over the historic rate of 1.4%. Table 2 in the EA indicates that Stower Street traffic will increase from 2280 to 8060. This is a significant increase for a street that runs through a residential neighborhood. Residents had no idea of the degree of impact to the neighborhood in general and their property in particular until the project was presented. Stower Street residents have gone on record of being opposed to this project as soon as they became aware of the project's scope and magnitude. The attached census data confirms that Miles City has not grown over the past decade. I cannot see the benefit gained by destroying a quiet neighborhood, in a city with no growth.

3

### Impacts (page 19)

The following comments diminish the project's overall impact because it does not mention the widened driving lanes, the addition of two parking lanes, increased noise due to increased traffic; and the increased potential of traffic accidents. Instead it merely states that "localized impacts would occur . . ."

4

"However, under the Stower Street proposed project, adjacent property

---

<sup>2</sup>Ibid., p. 68.

## Response

2. Thank you for your comments. Documentation on the safety of wider streets is not definitive. It is the City and MDT's belief that the increased sight distance and the wider lanes associated with the build alternatives for the proposed projects would reduce the potential for vehicular conflicts. See response to Comment #1

Amenities for pedestrians are a key element of the proposed projects, with the inclusion of sidewalks in the build alternatives for all three projects.

3. Since the public hearing was held, MDT has compiled additional traffic analysis, which is described in Section 4, Clarifications to the Environmental Assessment. See response to Comment #1.

4. Response on next page

## Comment #29 cont.

owners would be affected by increased traffic volumes along that street more so than those increased volumes associated with the no build alternative.” Highland Park School may experience less traffic in front of school and more in back. “While localized impacts would occur and increased traffic volumes beyond historic increases are projected for the proposed Stower Street project, the speed limits and number of travel lanes would not change in the proposed project corridors from existing conditions. The no Build Alternative would not result in traffic increases, but it would not benefit the community as a whole”.

4 cont.

### Emergency Services (page 22)

The EA fails to mention the potential for increased traffic accidents. The alleged benefits gained for emergency services need to be assessed with the increased likelihood of traffic accidents. The EA places more emphasis on fire rescue rather than injury prevention. The biggest threat to life safety is not fires but car accidents. The vast majority of fire department emergencies involve car accidents by a large margin.<sup>3</sup>

5

### Noise (page 25)

Stower Street is a Type 1 project (23 CFR 772). Increased traffic volumes associated with this project will increase the noise levels. The EA’s data shows that auto traffic increases will be 3.5 times greater than current levels; four times greater for medium trucks; and 3 times greater for heavy trucks. These are large increases. It is safe to conclude that the noise increases will be significant. The EA fails to assess the project’s impact on noise levels.

6

### Visual Impacts (page 26)

The EA fails to mention any negative visual impacts in connection to the western portion of the project such as loss of trees, green space and the conversion of a neighborhood street into a major thoroughfare for east west traffic. The visual impacts are significant.

I have attached a copy of City Councilman Jerry Partridge’s Letter to the Editor in the *Miles City Star*, June 12, 2002 that clearly states that this project will result in the loss of trees and the changes to the neighborhood that will occur if this project is undertaken.

7

<sup>3</sup>Ibid., p. 67.

## Response

4. The discussion of driving lanes and parking lanes can be found in Section 2, Alternatives, of the EA. The discussion of noise impacts is in Section 3.2, Noise, of the EA. Also, updated information on both of the topic areas is presented in Section 4, Clarifications to the Environmental Assessment. It is not expected that accident rates will increase as a result of the build or no-build alternatives.
5. Comment noted. Vehicle accident rates are not anticipated to increase as a direct result associated with either the Build or No-Build Alternative of the Stower Street project.
6. Noise levels would increase along Stower Street associated with Build Alternative, however the change in the noise levels was not projected to be significant. MDT completed additional noise analysis since the public hearing was held. The results of this analysis are presented in Section 4, Clarifications to the Environmental Assessment. See response to Comment #1
7. See response on following page.



## Comment #29 cont.

I have also attached a Letter to the Editor, *Miles City Star*, June 20, 2002, from Ms. Chery Porten. Ms Porten mentions that Portland Oregon and Multnomah County have placed limits on street widening projects because of the negative impacts associated with these projects. In fact, the fire chief helped initiate the new public program called "Skinny Streets".<sup>4</sup> We should learn from other communities mistakes.

### Mitigation:

The EA states that "[T]he changes to the visual environment associated with the proposed project are not considered to be major, and therefore no mitigation is required." I disagree. Anyone who takes the time to come out and visually inspect the proposed project would agree that the changes are significant. The photographs that appear in the EA do not provide the reader with a clear picture of the visual impacts associated with this project.

### Local and Regional Economics (pages 26 & 27)

The EA's statements do not indicate any real benefit to the local and regional economy by undertaking this project. Miles City has not grown over the past decade; the costs of this project outweigh the benefits. I cannot support this project because it will destroy a neighborhood, lower property values, and increase the risk of traffic accidents simply to move the same number of people across town faster.

### Cultural Archeological/Historical Resources Impacts (page 29)

The EA concludes that the Thomas Shore residence will not be physically impacted by this project, but it fails to address the impacts to the property. This conclusion contradicts the Memorandum of Agreement in Appendix C which states "WHEREAS FHWA has determined that the undertaking will have an effect on the Thomas Shore Residence . . ." Furthermore, the EA statement that "there would be a change of the setting of the property with the widening of the road and the addition of the sidewalks, curb and gutter . . ." reaffirms that the project will impact this property.

My husband and I own the Shore residence. We did not sign the Memorandum of Agreement because we did not agree with the conclusion that this project will not negatively impact our property.

<sup>4</sup>Ibid. , p 68.

## Response

7. Revisions to the section describing visual impacts in the Environmental Assessment are noted in Section 4, Clarifications to the Environmental Assessment. See response to Comment #1
  
8. Thank you for your comment. See response to Comment #1
  
9. Revisions to the text in the Environmental Assessment pertaining to the Determination of Effect for the Stower Street Build Alternative and the Memorandum of Agreement status are noted in Section 4, Clarifications to the Environmental Assessment. The Determination of Effect only applies to the Build Alternative for Stower Street. There would be no effect under the No-Build Alternative.

## Comment #29 cont.

### 3.4 SECONDARY AND CUMULATIVE IMPACTS (page 37)

The conclusion reached in this section is ludicrous. This section serves the purpose of diluting the impacts from the Stower Street Project by coupling it with two projects containing relatively few environmental impacts..

} 10

### 4.3 Public Involvement (pages 41& 42)

The following summary statement diminishes the environmental impacts of the Stower Street Project because it is combined two other projects with minor environmental impacts.

“Localized effects to adjacent residents and property owners along Stower Street have been voiced as the biggest cause for concern. However, as others have commented, “It is important to keep the best interests of the City in mind, and the benefits of the three proposed projects outweigh the disadvantages.”

} 11

Stower Street residents have been actively involved in opposing this project when it became apparent how it would impact their neighborhood. It is unfair to expect residents to respond to a project in its conceptual phase. People need to have a clear idea of a project plan before they can respond to it.

The focus of the Stower Street project is on cars. It delivers the message that cars live here rather than people live here. The Stower Street Project’s cost and its negative impacts to the environment do not justify moving forward.

} 12

Janet R. Kelly

Attachments

## Response

10. Revisions to the text in the Environmental Assessment on cumulative impacts are noted in Section 4, Clarifications to the Environmental Assessment. See response to Comment #1.
11. Revisions to the paragraph you refer to in the Public Involvement section in the EA are noted in Section 4, Clarifications to the Environmental Assessment. See response to Comment #1.
12. Comments noted.

# Comment #29 cont.

Population Estimates for Places: July 1, 1999, and Population Change: April 1, 1990 to July 1, 1999

Place	7/1/99 Estimated Population	4/1/90 Population Base	4/1/90 to 7/1/99 Numeric Change	Percent Change	1999 Rank
Alberton town	423	354	69	19.5	88
Anaconda-Deer Lodge County*	9,721	10,356	-635	-6.1	9
Bainville town	164	165	-1	-0.6	113
Baker city	1,698	1,824	-126	-6.9	42
Bearcreek town	43	37	6	16.2	127
Belgrade city	5,195	3,374	1,821	54.0	15
Belt city	544	544	0	0.0	80
Big Sandy town	686	744	-58	-7.8	73
Big Timber city	1,796	1,573	223	14.2	40
Billings city	92,988	81,469	11,519	14.1	1
Boulder town	1,689	1,307	382	29.2	43
Bozeman city	30,723	22,712	8,011	35.3	5
Bridger town	833	692	141	20.4	67
Broadus town	501	583	-82	-14.1	83
Broadview town	183	128	55	43.0	110
Brockton town	358	365	-7	-1.9	96
Browning town	1,199	1,156	43	3.7	52
Butte-Silver Bow (remainder)*	33,325	33,252	73	0.2	4
Cascade town	600	608	-8	-1.3	77
Chester town	931	944	-13	-1.4	64
Chinook city	1,573	1,515	58	3.8	46
Choteau city	1,893	1,788	105	5.9	38
Circle town	657	777	-120	-15.4	74
Clyde Park town	365	282	83	29.4	94
Columbia Falls city	4,293	2,894	1,399	48.3	21
Columbus town	2,192	1,594	598	37.5	31
Conrad city	2,844	2,902	-58	-2.0	28
Culbertson town	823	803	20	2.5	68
Cut Bank city	3,519	3,372	147	4.4	24
Darby town	1,089	708	381	53.8	56
Deer Lodge city	3,655	3,362	293	8.7	23
Denton town	359	350	9	2.6	95
Dillon city	4,342	4,104	238	5.8	19
Dodson town	123	137	-14	-10.2	122
Drummond town	276	261	15	5.7	100
Dutton town	397	392	5	1.3	90
East Helena town	1,713	1,498	215	14.4	41
Ekalsaka town	422	439	-17	-3.9	89
Ennis town	1,039	785	254	32.4	59
Eureka town	1,105	1,053	52	4.9	55
Fairfield town	687	656	31	4.7	72
Fairview town	812	861	-49	-5.7	69
Flaxville town	74	88	-14	-15.9	125
Forsyth city	2,008	2,178	-170	-7.8	36
Fort Benton city	1,581	1,660	-79	-4.8	45
Fort Peck town	220	226	-6	-2.7	105
Froid town	190	195	-5	-2.6	109
Fromberg town	450	372	78	21.0	86
Geraldine town	279	299	-20	-6.7	99
Glasgow city	3,781	3,784	-3	-0.1	22
Glendive city	4,340	4,822	-482	-10.0	20
Grass Range town	158	155	3	1.9	116
Great Falls city	56,340	55,376	964	1.7	3
Hamilton city	4,829	2,901	1,928	66.5	18
Hardin city	3,385	3,017	368	12.2	25
Harlem city	973	882	91	10.3	61
Harlowton city	1,075	1,077	-2	-0.2	57
Havre city	10,425	10,811	-386	-3.6	8
Helena city	29,081	25,070	4,011	16.0	6
Hingham town	145	155	-10	-6.5	118

Place	7/1/99 Estimated Population	4/1/90 Population Base	4/1/90 to 7/1/99 Numeric Change	Percent Change	1999 Rank
Hobson town	229	226	3	1.3	104
Hot Springs town	488	436	52	11.9	84
Hysham town	370	371	-1	-0.3	93
Ismay town	19	19	0	0.0	128
Joliet town	689	554	135	24.4	71
Jordan town	452	494	-42	-8.5	85
Judith Gap city	138	133	5	3.8	120
Kalispell city	17,149	12,605	4,544	36.0	7
Kevin town	161	161	-20	-11.0	115
Laurel city	6,276	5,865	411	7.0	13
Lavina town	178	151	27	17.9	112
Lewistown city	6,026	6,009	17	0.3	14
Libby city	2,948	2,770	178	6.4	26
Lima town	263	265	-2	-0.8	101
Livingston city	7,626	6,904	722	10.5	11
Lodge Grass town	573	517	56	10.8	79
Malta city	2,162	2,353	-191	-8.1	33
Manhattan town	1,467	1,059	408	38.5	48
Medicine Lake town	313	362	-49	-13.5	97
Melstone town	121	109	12	11.0	123
Miles City city	8,698	8,621	77	0.9	10
Missoula city	58,460	48,430	10,030	20.7	2
Moore town	208	209	-1	-0.5	108
Nashua town	374	379	-5	-1.3	92
Neihart town	49	53	-4	-7.5	126
Ophelm town	140	145	-5	-3.4	119
Outlook town	93	109	-16	-14.7	124
Phillipsburg town	969	924	45	4.9	62
Pinesdale town	1,052	668	384	57.5	58
Plains town	1,233	1,000	233	23.3	50
Plentywood city	1,888	2,146	-258	-12.0	39
Plevna town	126	140	-14	-10.0	121
Polson city	5,033	3,562	1,471	41.3	16
Poplar city	898	873	25	2.9	66
Red Lodge city	2,278	1,979	299	15.1	30
Rexford town	147	132	15	11.4	117
Richey town	231	259	-28	-10.8	102
Ronan city	1,980	1,565	415	26.5	37
Roundup city	2,078	1,888	190	10.1	34
Ryegate town	302	259	43	16.6	88
Saco town	229	263	-34	-12.9	104
St. Ignatius town	921	761	160	21.0	65
Scobey city	1,109	1,254	-145	-11.6	54
Shelby city	2,596	2,795	-199	-7.1	29
Sheridan town	752	662	90	13.6	70
Sidney city	4,829	5,216	-387	-7.4	18
Stanford town	538	529	9	1.7	82
Stevensville town	2,187	1,284	903	70.3	32
Sunburst town	390	437	-47	-10.8	81
Superior town	1,031	900	131	14.6	60
Terry town	649	659	-10	-1.5	75
Thompson Falls city	1,610	1,355	255	18.8	44
Three Forks city	1,513	1,162	351	30.2	47
Townsend city	2,077	1,603	474	29.6	35
Troy city	1,124	1,045	79	7.6	53
Twin Bridges town	432	374	58	15.5	87
Valier town	539	524	15	2.9	81
Virginia City town	161	142	19	13.4	115
Walkerville town	629	689	-60	-8.7	76
Westby town	218	253	-35	-13.8	106
West Yellowstone town	1,222	905	317	35.0	51
Whitefish city	6,292	4,621	1,671	36.2	12
Whitehall town	1,442	1,066	376	35.3	49

Comment #29 cont.

Place	7/1/99	4/1/90	4/1/90 to 7/1/99		1999 Rank
	Estimated Population	Population Base	Numeric Change	Percent Change	
White Sulphur Springs city	965	970	-5	-0.5	63
Wibaux town	590	628	-38	-6.1	78
Winifred town	210	150	60	40.0	107
Winnett town	178	188	-10	-5.3	112
Wolf Point city	2,890	2,937	-47	-1.6	27

\* Consolidated City/County

Source: Population Estimates Program, Population Division, U.S. Census Bureau, Washington, DC 20233  
 Internet Release Date: October 20, 2000 l:\popests\place99est\99estpl.xls

City/Town/CDP*	County	2000 CENSUS	2000 RANK	1990 CENSUS	Numeric Change 1990 to 2000	Population % Change**** 1990 to 2000
Drummond town	Granite County	318	163	264	54	20.45
Dutton town	Teton County	389	149	392	-3	-0.77
East Glacier Park Village CDP	Glacier County	365	148	328	70	21.47
East Helena town	Lewis and Clark County	1,642	54	1,538	104	6.76
East Missoula CDP	Missoula County	2,070	44			
Etalaka town	Cartier County	410	146	439	-29	-6.81
Elliston CDP	Powell County	225	190	--	--	--
Elmo CDP	Lake County	143	229	--	--	--
Ennis town	Madison County	840	101	773	67	8.67
Eureka town	Lincoln County	1,017	85	1,043	-26	-2.49
Evano CDP	Missoula County	329	160	--	--	--
Evergreen CDP	Flathead County	5,215	15	4,108	2,108	51.25
Fairfield town	Teton County	659	119	660	-1	-0.15
Fairview town	Richland County	708	113	869	-160	-18.41
Fallon CDP	Prairie County	138	232	659	-521	-79.06
Finley Point CDP	Lake County	493	135	395	88	24.81
Fixville town	Daniels County	87	258	88	-1	-1.14
Florence CDP	Ravalli County	901	93	--	--	--
Forayth city	Rosebud County	1,944	47	2,178	-234	-10.74
Fort Belknap Agency CDP	Blaine County	1,262	75	422	840	199.05
Fort Benton city	Chouteau County	1,594	65	1,660	-66	-3.98
Fort Peck town	Valley County	240	187	228	14	6.19
Fort Shaw CDP	Cascade County	274	179	--	--	--
Fort Smith CDP	Big Horn County	122	243	--	--	--
Fortine CDP	Lincoln County	169	216	--	--	--
Four Corners CDP	Gallatin County	1,828	51	--	--	--
Fox Lake CDP	Richland County	157	220	--	--	--
Fraser CDP	Valley County	432	139	403	49	12.16
Frenchtown CDP	Missoula County	883	95	--	--	--
Frod town	Roosevelt County	185	198	195	0	0.00
Fromberg town	Carbon County	486	136	370	116	31.33
Gardiner CDP	Park County	651	99	--	--	--
Garrison CDP	Powell County	112	247	--	--	--
Geraldine town	Chouteau County	284	172	298	-15	-5.02
Gilford CDP	Hill County	185	207	--	--	--
Glasgow city	Valley County	3,253	31	3,572	-319	-8.99
Glenrose city	Dawson County	728	21	4,802	-773	-15.52
Grass Range town	Fergus County	148	226	159	-10	-6.29
Great Falls city	Cascade County	56,690	3	55,125	1,565	2.84
Greydell CDP	Sweet Grass County	56	269	--	--	--
Hamilton city	Ravalli County	3,705	26	2,737	968	35.37
Hardin city	Big Horn County	3,384	30	2,840	444	16.10
Harlem city	Blaine County	848	100	882	-34	-3.85
Hartlow town	Wheatland County	1,052	83	1,046	13	1.24
Harrison CDP	Madison County	162	219	--	--	--
Havre city	Hill County	9,621	8	10,201	-580	-5.69
Havre North CDP	Hill County	973	87	1,110	-137	-12.34
Hays CDP	Blaine County	702	115	333	369	110.81
Heart Butte CDP	Pondera County	688	117	498	190	39.88
Helena city	Lewis and Clark County	25,780	6	24,609	1,171	4.76
Helena Valley Northeast CDP	Lewis and Clark County	2,122	40	1,585	537	33.89
Helena Valley Northwest CDP	Lewis and Clark County	2,082	43	1,215	867	71.39
Helena Valley Southeast CDP	Lewis and Clark County	7,141	11	4,601	2,540	85.21
Helena Valley West Central CDP	Lewis and Clark County	6,983	12	6,327	656	10.37
Helena West Side CDP	Lewis and Clark County	1,711	58	1,847	-136	-7.38
Heron CDP	Sanders County	149	227	--	--	--
Herron CDP	Hill County	100	253	--	--	--
Highwood CDP	Chouteau County	189	202	--	--	--
Hingham town	Hill County	157	221	181	-24	-13.26
Hobson city	Judith Basin County	244	185	225	19	7.96
Hot Springs town	Sanders County	531	131	411	120	29.20
Hungry Horse CDP	Flathead County	934	89	--	--	--
Hunley CDP	Yellowstone County	411	145	--	--	--
Hysham town	Treasure County	330	159	361	-31	-8.59
Inverness CDP	Hill County	103	252	--	--	--
Iamay town	Custer County	26	274	19	7	36.84
Jefferson City CDP	Jefferson County	295	168	--	--	--
Jette CDP	Lake County	267	178	--	--	--
Joliet town	Carbon County	576	127	522	53	10.15
Joplin CDP	Liberty County	210	195	--	--	--
Jordan town	Garfield County	364	154	494	-130	-26.32
Judith Gap city	Wheatland County	164	218	133	31	23.31
Kallispeil city	Flathead County	14,223	7	11,917	2,306	19.35
Kerr CDP	Lake County	17	275	--	--	--
Kevin town	Toole County	178	213	185	-7	-3.78
Kicking Horse CDP	Lake County	80	281	281	-201	-71.53
Kings Point CDP	Lake County	168	217	--	--	--
Klein CDP	Musselshell County	188	204	--	--	--
Kraie River CDP	Richland County	287	167	--	--	--

Miles City Star  
Letters to the Editor  
Wednesday, June 12, 2002

## Trees, quality of life an issue with Stower

Dear editor,

At the May 28 meeting of the Miles City Council, they approved the paving and widening of Stower Street. This wider Stower Street will pass through the yet-to-be-developed Kosty property, join the street running between Albertson's and Ace Hardware, and then through the stop light, and pass Wal-Mart. State highway funds will pay for the project.

The Council voted 7 to 1 in favor. I was the only dissenting vote. I want to take this opportunity to explain my vote.

The current Stower Street is 35 feet wide with room for boulevards and sidewalks on each side. The new street will be 43 feet wide, 21 feet from the middle line to the curb plus have 5-foot sidewalks on each side 53 feet from one sidewalk edge to the other. To meet the requirements of this new street, every tree along the boulevard of the present Stower Street will be removed. Trees that took over 50 years to grow will be replaced by concrete, a sterile ribbon through the heart of

### Letters to the editor

Miles City.

Economic studies indicate that people make location decisions based on schools, parks, and the general quality of life in a community. Tree-shaded streets are an important part of that quality of life. Does anyone believe that people are moving to Bozeman or Kalispell because of wide streets?

Economic studies further indicate that businesses locate in areas for much the same reasons that people do. These trees are part of a way of life that people value. To remove them seems to be pure folly.

A simple solution is to keep the old Stower Street as is and to make it a street with no parking on both sides. This, I believe, would meet the requirements of a state road and save the trees.

Jerry Partridge  
Councilperson Ward 2  
Miles City

Miles City Star  
Letters to the Editor  
Thursday, June 20, 2002

## Councilman has point

Dear editor,

We wish to write in support of Jerry Partridge's opinions which he stated in a recent letter to the Star.

While we understand the other council members wish to improve the flow of traffic, we feel it is extremely short-sighted when it is considered that there will be removal of mature trees. The appearance of a town - its trees, flower beds and shrubs, parks where citizens can go to walk or just enjoy the outdoors - are of vital importance, not only to our residents, but for visitors or those who may be contemplating a move to Miles City.

The Wall Street Journal ran an article in which they discussed the fact that the city of Portland and Multnomah County had voted to create a moratorium on future widening of highways or the building of new expanded highways. They had come to realize that in their zeal to create ever-more efficient ways to accommodate motorists, they were destroying much of the beauty which attracted people to the area.

We were impressed with San Antonio's famed River Walk, as are the thousands of visitors whom it yearly attracts to their city. The planners wisely meandered around old established trees. They did not ruthlessly cut or remove them. In many cases it was necessary to build supports to hold them in place because the river channel needed to be widened. The result is an area of beauty and charm, not a concrete ditch that no one would care to see.

It is not always necessary that progress wear such an ugly face. Our Main Street is an excellent example of wise planning. The planting of beautiful trees, the tubs of flowers, the benches on which people can sit, often shaded by these trees, are all improve-

### Letters to the editor

ments which greatly add to the attractiveness of our town. They are some of the things which attract visitors here.

Our spring cleanup improved our appearance a good deal. Trash was collected, weeds cut, and litter removed from the streets. We commend those who planned this project and ask that we do so again before spring.

We are concerned that our parks may no longer be maintained. This is very, very short-sighted. In addition to asking citizens to help maintain these parks, could not city employees give a little extra time to assist in their maintenance? The city built a vehicle-washing facility close by. No doubt it is of great help in maintaining the appearance of the city's vehicles. However, the water from all this washing encourages the growth of unsightly weeds. Wouldn't it be fine, if that every time a vehicle were washed, that driver pulled just a few weeds?

We have thought, too, that when employees were filling or getting gravel at the storage area near the Tongue River, those same employees could pull just a few weeds. This would improve the appearance and eliminate the problem of those tumbleweeds breaking off and rolling across adjacent land. Not on the list of required duties? Perhaps not, but most of us need a bit more exercise and it is honest and noble work. I know that if I pull just a few weeds each time I go outdoors, great progress can be made.

Chery Porten  
Miles City

**Comment #30**

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

**Patrick J. Kelly**  
Attorney at Law  
14 North 9th Street -- P.O. Box 249  
Miles City, Montana 59301  
Telephone: (406) 234-2461 -- Fax: (406) 234-5449

MASTER FILE  
COPY  
#29

April 30, 2003

Mr. Bill McChesney  
Department of Transportation  
P.O. Box 890  
Glendive, MT 59330-0890

RE: Environmental Assessment Miles City Street Projects March 03, 2003

Dear Mr. McChesney,

The Environmental Assessment presented by the Montana Department of Transportation at the hearing held April 15, 2003 in Miles City is deficient and inadequate for the purpose for which it was prepared. The report was prepared by David Evans & Associates, of Denver, Colorado.

The Environmental Assessment (EA) purports to assess the impact of the three street projects on their respective environments. In that effort, the EA fails completely.

The purpose of an EA, as I understand the Montana Administrative Code, is to determine whether or not an Environmental Impact Statement (EIS) is required. That determination is not made in this EA.

The conclusion that is made: "In summary, the proposed projects are generally well-received and supported by the majority of the Miles City community" is in error and lacks foundation.

} 1  
} 2

**Response**

1. Thank you for your comments. Revisions made to the Environmental Assessment (EA) after the public comment period are presented in Section 4, Clarifications to the Environmental Assessment.

The determination of whether an Environmental Impact Statement (EIS) is required is made by the Federal Highway Administration after they have reviewed the comments received during the public comment period and any supplemental documentation to the EA has been compiled. If FHWA determines that no significant environmental impacts are likely to result from the proposed projects, then a Finding of No Significant Impact (FONSI) is prepared. If FHWA determines that significant impacts would result, then an EIS would be prepared. Based on the Preferred Alternative, as described in Section 1 of this document, FHWA has concluded that a FONSI is appropriate.

2. As identified in Section 4, Clarifications to the Environmental Assessment, this sentence has been deleted.

## Comment #30 cont.

Mr Bill McChesney  
April 30, 2003  
Page 2

At the hearing held April 15, 2003, the representative from David Evans & Associates, Kristen D. Kenyon, AICP, admitted that her firm had conducted no interviews of affected citizens in the preparation of the EA. When Ms. Kenyon was asked if impacts noted in the project corridor would also impact the corridor from the corner of Strevell and Stower westerly along Stower, along 8th Street and into downtown Miles City, she admitted that the impact would affect the entire length of travel. She admitted that the EA was deficient in this respect and would have to be expanded in order to include the balance of the corridor directly affected by the proposed Stower Street project. Since the report is inadequate by the admission of the preparer, comment regarding the Environmental Assessment will have to await the completion of the final Impact Assessment. 3

The clumping of other street projects (Strevell and Wilson) with the Stower Street project for the purpose of the EA is misleading. The projects other than Stower have met with little resistance and in fact have mostly neighborhood impact and benefit. However, it is important to note that one of the representatives from the Montana Department of Transportation, Mr. Mengel, noted the strong neighborhood support for the Wilson and Strevell Street Projects even as to the details of their design. In the Strevell Street Project it was noted that no sidewalk is contemplated on the west side of the project because of the wishes of the neighbors and their restrictive covenants. Although restrictive covenants among the neighbors of the west side of the Strevell Street Project could not legally assert a covenant prohibition against sidewalks into the public right-of-way, their desires were met with compliance by MDOT, the City of Miles City, and apparently David Evans & Associates. The wishes of the directly affected adjacent owners in the Stower Project have been ignored. 4

It is obvious that the residents on the west side of the Strevell Street Project wish to inhabit a subdivision known as "Country Club Estates" wherein they can restrict both vehicle and foot traffic. They wish to preserve their isolation in order to preserve property values.

Property values as a general topic have been omitted from the EA with respect to the Stower Street Project. No interviews were conducted with local realtors and since no interviews were conducted with directly affected citizens, there is no data in the report regarding the economic damage to the adjacent 5

## Response

3. MDT compiled additional traffic information for the length of Stower Street after the public hearing was held. Results of this analysis are presented in Section 4, Clarifications to the Environmental Assessment.
4. Comments noted. MDT and the City have been open to working with local residents and business owners throughout the environmental documentation and conceptual design process. They have discussed the proposed projects at meetings open to the public occurring over the last three years. Residents along the Wilson Street and Strevell Avenue project corridors have met with MDT and the City to work through issues along those two corridors. MDT and the City have met with Stower property owners on August 19, 2003 with them on this topic.
5. The impact of the proposed projects on the value of adjacent properties is discussed in Section 4, Clarifications to the Environmental Assessment. However, for Stower Street, the Preferred Alternative is the No Build Alternative and therefore, there would be no changes.

## Comment #30 cont.

owners from the effects of the Stower Street Project from its terminus on Haynes to its intersection with 8th Street.

Public Safety issues flowing from the Stower Street Project were not studied in any depth by David Evans & Associates. Having admitted that the project will affect the entire length of Stower and the length of 8th Street to downtown Miles City, the analysis provided by David Evans & Associates failed to note that in proposing this project, public authority is intentionally inviting traffic to a four-fold increase over a surface railroad crossing on 8th and the Burlington Northern Santa Fe tracks. It seems obvious that either a bottle-neck will occur at the railroad crossing or an increase in railroad-automobile collisions will occur as a result.

The mandate of the Federal Highway Administration to community impact assessment has been avoided with respect to the Stower Street Project in the EA.

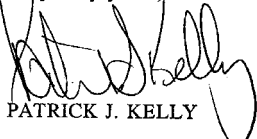
Reference is made in the Environmental Assessment of the impact, or lack thereof, on the Thomas Shore residence. I am the owner of that residence and I object strenuously to the rather cavalier treatment which my property received in the Environmental Assessment. Although the Federal Highway Administration determined that there would be an impact on this historic residence, the Montana Department of Transportation has ignored that finding and stated that there would be no impact. The literal "rubber stamp" of the Montana State Historic Preservation office embossed upon a letter from the Montana Department of Transportation indicates that the historic office was not given an opportunity to study the impact of the proposed project in any depth or detail.

The inclusion of a proposed contract between myself and the MDOT is misleading, confusing and if used at all, should have inspired David Evans et al. to inquire further. I have not agreed to the proposed contract. However its existence negates the conclusion that the project will have "no impact" on my property. My property will suffer great aesthetic, cultural and economic damage from the project.

Negative impacts on other historic residences along Stower were ignored completely.

The EA as presented at the April 15, 2003, hearing fails to comply with the requirements of the Montana Environmental Policy Act, the requirements of the Montana Administrative Code, and the requirements of the statutes and regulations under which the Federal Highway Administration is providing the funding for these projects.

Very truly yours,

  
PATRICK J. KELLY

## Response

6. Thank you for your comment. Please see additional traffic analysis in Section 4, Clarifications to the Environmental Assessment. Based on this additional analysis, the traffic for the Build Alternative is predicted to be higher than the No Build at 8<sup>th</sup> Street.
7. Community impacts are addressed in the EA in Section 3.2, Effects on the Community. Also, see response to Comment #1
8. For the Build Alternative of Stower Street, MDT submitted the Determination of Effect to the Montana SHPO in February 2002, and then received the SHPO's concurrence in December 2002. It appears that the SHPO was given an adequate opportunity to study the issue in depth and detail. The impacts to the historic Thomas Shore property are documented in the Determination of Effect, which is included in Appendix C of the Environmental Assessment. This documentation identified a change to the setting of the historic property based on the Build Alternative for Stower Street. For the No Build Alternative, there are no impacts to the property.  
  
Revisions to the text in the Environmental Assessment pertaining to the Thomas Shore property and MOA are presented in Section 4, Clarifications to the Environmental Assessment.  
  
It should be noted that the Determination of Effect and the MOA only apply to the Build Alternative for Stower Street. Since the Preferred Alternative for Stower Street is the No Build Alternative, there are no impacts to the historic Thomas Shore property.
9. The Environmental Assessment and the FONSI have been prepared in accordance with 42 USC 4321-4347, the National Environmental Policy Act (NEPA); 49 USC 303, Section 4(f) of the 1966 Department of Transportation Act; MCA 75-1-101, it seq. MCA, Federal Highway Administration (FHWA) policies and procedures for implementing NEPA.



Comment #31

RECVD NDTGLD APR 22 '03 AM 09:44

SOUTHEAST CONSULTING SERVICES

#30

Julie Krutzfeldt

2314 Pearl

Miles City, Montana 59301

Phone: 406-232-2965

Fax: 406-232-1005

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

MASTER FILE  
COPY

April 14, 2003

ACT	RTE	MAIL ROUTE	COPY
		DISTRICT ADMINISTRATOR	
		CONSTRUCTION ENGR	
		ASST CONSTRUCTION ENGR	
		Eng Proj Mgr. Julie@earthlink.net	
		Eng Officer	
		MAINTENANCE CHIEF - GDV	
		MAINTENANCE CHIEF - MC	
		MAINTENANCE CHIEF - WP	
		Misc Supv G M W	
		Shop Supv G M W	
		Sectionman G M W	
		ENGINEERING SERVICES ENGR	
		Design Supv	
		Materials Supv	
		Utility Agent	
		Traffic Engr	
		Right of Way	
		DIST ADMINISTRATIVE OFFICER	
		PERSONNEL SPECIALIST	
		District File	
		Bulletin Board	

Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

Dear Mr. McChesney:

My family has lived in the vicinity of the VA Hospital and Miles Community College for twenty-eight years. We have seen a phenomenal increase in the traffic on Dickinson in the past ten years. The Stower Project recently discussed in the paper is long overdue!

Traffic coming from Southgate or Haynes Avenue often takes the shortcut to schools and town along Stower. They must divert and take the twisted pathway behind Albertsons to Dickinson. I have witnessed many dangerous situations with cars and pedestrians over the years.

I strongly support the access on Stower. Traffic on Dickinson has become dangerous and cumbersome due to the lack of access through to our main shopping district in Miles City. Thank you for your consideration in this matter.

Sincerely,

*Julie Krutzfeldt*  
Julie Krutzfeldt

Response

Thank you for your comment. See response to Comment #1.

**Comment #32**

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

RECVD NDTGLD APR 22 '03 AM 09:44

MASTER FILE  
COPY  
#31

April 24, 2003

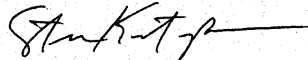
Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

Dear Mr. McChesney:

The traffic conditions in Miles City must meet the demands of the future! Haynes Avenue is the new commercial development for this area. It only stands to reason that the community citizens should have adequate access to the main shopping district in Miles City.

The Stower Project is the only practical solution to allow people access to shopping. Support the project and make it happen.

Thanks,



Steve Krutzfeldt

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Pro! Man		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Misc Supt G.M.W		
		Shon Surv G.M.W		

**Response**

Thank you for your comment. See response to Comment #1.

# Comment #33

RECVD MDTGLD APR 22 '03 AM 09:45

**RECEIVED**

MAY 14 2003

**ENVIRONMENTAL**

MASTER FILE  
COPY

#33

April 22, 2003

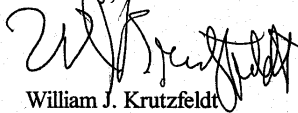
Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

Dear Mr. McChesney:

I support the Stower Project to allow access from Haynes avenue to downtown Miles City. The project is well developed and will be a progressive move for traffic flow in the future.

Haynes Avenue is the commercial hub of Miles City. It stands to reason that the citizens of this community should have access to the area. Improve Stower and continue with the plans to provide for future growth.

Sincerely,



William J. Krutzfeldt  
2314 Pearl  
Miles City, Montana 59301

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Miles Supt G.M.W.		

# Response

Thank you for your comment. See response to Comment #1.

Comment #34

Response

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

MASTER FILE  
COPY

MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

#33

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Allen C. Kutt  
P.O. Box 691  
Miles City, MT.  
59301

COMMENTS: Opening Stover as a through  
street would reduce some of the  
traffic on main street. Please insure  
4 way stops are installed at the  
junctions with other through streets  
such as Strevell St.

Thank you for your comment. See response to Comment #1.

Comment #35

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

MASTER FILE  
COPY

MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

#35

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 26, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Myrna Kutt  
Box 691  
Miles City - Montana 59301

COMMENTS: I would like to see Stoner Street become a thru street to Haynes Ave. This will reduce some of the traffic on main and will also give another route to the hospital - especially in emergency cases.

Response

Thank you for your comment. See response to Comment #1.

Comment #36

Response

REC'D MDTGLD APR 22 '03 AM 09:42

MASTER FILE COPY

RECEIVED MONTANA DEPARTMENT OF TRANSPORTATION Comment Form

#36

MAY 14 2003

Project: Miles City Urban EA Hearing
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)
Control Number: 4361,4362,4363

ENVIRONMENTAL

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

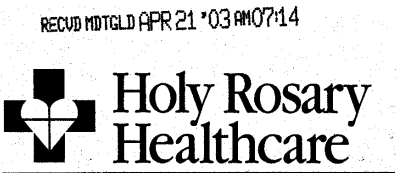
Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Doug Sedholt 2117 Jackson
MC, Avard & Councilman 4-17-03

COMMENTS: I am 100% for these projects, I think they will all be assets to Miles city. They are part of the growth of Miles and I think that the few that are complaining are the minority, I know some people that live on the affected part of Stover that are in favor of it, but don't want to come to the meeting and argue. In closing I can't stress enough how important these projects are
Doug Sedholt

Thank you for your comments. See response to Comment #1.

Comment #37



Sisters of Charity of Leavenworth Health System

**RECEIVED**

MAY 14 2003

BILL McCHESNEY **ENVIRONMENTAL**

PROJECT: STPU 8013(1)  
STPU 8006 (1)  
STPU 8009(2)

REC'D MDTGLD APR 21 \*03 AM 07:14

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Engr Proj Mgrs		
		Engr Officer		
		MAINTENANCE CHIEF - GDV	2600 Wilson Street	
		MAINTENANCE CHIEF - MC	Miles City, Montana 59301	
		MAINTENANCE CHIEF - WF		
		Mktg Supvl - G.M.W.		
		Shop Supv - G.M.W.	406-233-2600	
		Sectionmen G.M.W.	1-800-843-3820	
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Assent		
		Traffic Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		MAIL ROOM CLERK		
		District File	4362	
		Bulletin Board	4363	

#36

MASTER COP

CONTROL NUMBER 436

COMMENTS:

ON BEHALF OF HOLY ROSARY HEALTHCARE, I WOULD LIKE TO EXPRESS OUR SUPPORT FOR THE WILSON STREET AND THE STREVELL STREET IMPROVEMENTS. THESE IMPROVEMENTS WILL IMPROVE THE ACCESS TO HOLY ROSARY FOR USERS AS WELL AS VISITORS. PROPERTY VALUES ARE NOT A CONCERN FOR US BUT ACCESS TO OUR FACILITY IS OF UTMOST IMPORTANCE. OUR LONG RANGE PLANS INCLUDE AN ACCESS TO OUR FACILITY FROM STREVELL STREET AND THE PROPOSED ENHANCEMENTS WILL SERVE OUR LONG RANG GOALS OF ACCESS TO HOLY ROSARY. YEARS AGO WHEN WE WERE IN THE CONSTRUCTION PHASE, WE SPENT CONSIDERABLE FUNDS IN REMOVING LARGE TREES ALONG WILSON STREET IN ANTICIPATION OF EVENTUAL IMPROVEMENTS. AFTER 11 YEARS, WE WELCOME THE IMPROVEMENTS PLANNED.

ONE CONCERN THAT I HAVE DURING THE CONSTRUCTION IS THAT OF LIMITED ACCESS TO THE CAMPUS FROM WILSON STREET. THE MAJORITY OF OUR TRAFFIC IS FROM THE WILSON STREET ENTRANCE. BOUTELLE AND HAYNES STREET SEEMS TO CREATE A BOTTLE NECK AT PARTICULAR TIMES OF THE DAY THAT WILL HAVE TO BE ADDRESSED IF WILSON STREET IS COMPLETELY BLOCKED OFF FOR A PERIOD OF TIME. I HAVE NO DOUBTS THAT THIS MATTER HAS NOT BE CONSIDERED AND RESOLUTION PLANNED. WE COMPLETELY SUPPORT THIS IMPROVEMENT.

IN PRINCIPLE I SUPPORT THE STOWER STREET PROJECT. MILES CITY HAS ACCESS TO FUNDING FOR THIS PROJECT THAT WE WILL LOOSE IF WE DON'T US IT. THE CITY CERTAINLY NEEDS ANOTHER CROSS STREET TO IMPROVE TRAFFIC FLOW. PROPERTY VALUES WILL INCREASE, TRAFFIC FLOW WILL BE IMPROVED, SAFETY OF SCHOOL CHILDREN FOR HILAND PARK SCHOOL WILL BE IMPROVED, BOULEVARDS WILL BE IMPROVED, TRAFFIC FLOW FOR THE LUTHERAN CHURCH WILL BE IMPROVED. I CAN'T SEE ANY NEGATIVES FOR THIS PROJECT AS WELL.

ALL AROUND THE PROPOSED IMPROVEMENTS HAVE LONG BEEN NEEDED AND I AM IN FULL SUPPORT OF THEM. IT'S ABOUT TIME, LET'S GET IT ON. THANK YOU FOR THE SELECTION OF AREAS AND YOUR TIME IN MAKING IT HAPPEN.

CLYDE LEISCHNER  
SUPPORT SERVICES

Response

1. Thank you for your comment. Improving access to the Holy Rosary Healthcare campus is one benefit of the proposed Wilson Street project as noted in the Environmental Assessment.
2. Access to the campus during construction of the proposed project is discussed in the Environmental Assessment under construction impacts. Specific dates and times of lane and street closures along Wilson Street will be determined in subsequent stages of the proposed project should it proceed. MDT would then coordinate with adjacent businesses, including the managers of the Holy Rosary facility.
3. Thank you for your comment regarding the Stower Street proposed project. See response to Comment #1.

Comment #38

RECEIVED

MAY 14 2003

ENVIRONMENTAL

REC'D MDTGLD MAY 06 \*03 AM 10:06

MASTER FILE COPY

MONTANA DEPARTMENT OF TRANSPORTATION

Comment Form

#38

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361, 4362, 4363

WILSON STUBBELL STOWER  
SR DR STOWER

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Rhonda McKay  
312 S. 4th St.  
Miles City, MT

COMMENTS: I think Stower should be a through street. It would improve traffic patterns + simplify things

Response

Thank you for your comment. See response to Comment #1.



Comment #39

Response

REC'D MDTGLD APR 24 '03 AM 09:59

MAST  
CO  
A 38

RECEIVED MONTANA DEPARTMENT OF TRANSPORTATION

MAY 14 2003

ENVIRONMENTAL

Comment Form

Project: Miles City Urban EA Hearing

Project Number: STPU 8013(1), STPU 8006(1), STPU 8002(2)  
Control Number: 4361, 4362, 4363

ACT	RTE	MAIL ROUTE	COPY INT
		DISTRICT ADMINISTRATOR	
		CONSTRUCTION ENGR	
		ASST CONSTRUCTION ENGR	
		Engr Evol Maint	
		MAINTENANCE CHIEF - MC	
		MAINTENANCE CHIEF - WP	
		Spec Supv G.M.W.	
		Spec Supv G.M.W.	
		Spec Supv G.M.W.	
		INDUSTRIAL SERVICES ENGR	
		Design Supv	
		Materials Supv	
		Utility Agent	
		Bank Clerk	
		DIST ADMINISTRATIVE OFFICER	
		DIST ADMINISTRATIVE OFFICER	
		District File	
		Bulletin Board	

You are invited to make your comments on this form and leave them at the meeting officials or take it with you and mail it to Bill McCleskey, Montana Department of Transportation, PO Box 890, Glendive, MT 59301-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Sherwood McKay  
312 S. 9th St.  
Miles City, MT 59301

COMMENTS: Stower needs to be completed through to N. Haynes. This should have been done long ago - for the benefit of the entire community. Please do not let a few affected property owners dictate what will be done. On the other hand, I hope compromises can be struck so homeowners don't feel "run over." But please make sure this project is done - for the sake of progress and the convenience of the citizenry.

Thank you for your comment. See response to Comment #1.

Comment #40

Response

RECEIVED

MAY 06 2003

ENVIRONMENTAL

CHARLEE F. MORRIS  
P.O. BOX 964  
GLENDAVE, MONTANA 59330

MASTER FILE  
COPY

#39

April 29, 2003

Jean Riley, P.E.  
MDT Environmental Services  
P.O. Box 201001  
Helena, MT 59620-1001

RE: STPU 8009(2) Stower Street, Miles City  
STPU 80013(1) Wilson Street, Miles City

Dear Ms Riley:

We bought the house at Corner of Cale and Stower in 1959. There was a sidewalk on Cale and the streets were unpaved without gutters. I was always concerned about the children - even before the school was built. After the school was built it was a very busy play ground the year around.

The wise place for the sidewalk on Stower was attached to the curb, in fact we put a narrow sidewalk attached to the curb on the Cale side. The Church attached their sidewalk which made good sense (just like sidewalks uptown). I always thought that is where sidewalks around schools, churches, and public buildings should be built (safer and easier access.

I feel trees are an important part of any town. They help air quality, afford shade, cool breezes and are hard to replace (many of the trees are over fifty years old).

The EA had many errors and a lot of misinformation. I am sure you are aware of its short comings. I trust you will correct them.

There have been suggestions for lights and hope they will be checked into. I know lights can make a safer and smoother flow of the traffic. Four way stops also have an advantage in keeping traffic moving in all directions.

As you can see from my above comments, I am opposed to the Stower Street project as purposed.

Sincerely,

*Charlee F. Morris*  
Charlee F. Morris

1. Thank you for your comments. MDT and the City have been working with adjacent property owners for all projects to discuss the possibility of relocating the sidewalk in locations in order to preserve trees where possible. The preferred alternative for Stower Street is the No-Build Alternative, which will not impact landscaping or trees.
2. Corrections made to the Environmental Assessment are noted in Section 4, Clarifications to the Environmental Assessment.
3. The installation of additional stoplights and/or signs may be considered by the City in the future, but is separate from the MDT proposed projects. Any stop signs or signals currently in existence would be maintained under the preferred alternative.
4. Comment noted.

Comment #41-A

RECEIVED

MAY 05 2003

ENVIRONMENTAL

HENRY A. (BUS) MORRIS  
304 CHESTNUT AVENUE, F.P.  
P.O. BOX 964  
GLENDALE, MONTANA 59330  
(406) 365-4017 (H)  
(406) 365-3321 (W)

MASTER FILE  
COPY

#40A

May 1, 2003

Jean Riley, P.E.  
MDT Environmental Services  
P.O. Box 201001  
Helena, MT 59620-1001

RE: STPU 8013(1) Wilson Street, Miles City

Dear Ms. Riley:

I believe the Wilson Street project is a very positive step for the community of Miles City. This will provide improved access and safety of access to the local medical center which services many people not only within the community, but also the surrounding area. I believe, however, that a significant improvement in the project could be made with the addition of a traffic light at the intersection with Haynes Avenue. This traffic light would not only serve to benefit the people utilizing Wilson Street, but would also have the downstream effect of allowing people to access Haynes Avenue from Sudlow, Tompy, and Comstock (both sides) more easily. Consideration might also be given to better signing for the hospital because the current little sign is very easy to miss.

As I have indicated before, I was not pleased with the job done on the Environmental Assessment. I believe that it might more accurately reflect the conditions for the Wilson Street project and the Strevell Avenue project [STPU 8006(1)] if these two projects were separated from the Stower Street project which has significantly different impacts. In addition, since there seems to be overall support for these two projects, final plans could be developed on them at the same time you are doing the required revisions on the Stower Street project (to accurately reflect existing facts and impacts). I would think that this separation should be relatively easy to accomplish in this day and age of computers, as well as being a much more effective way of addressing all of the issues.

Sincerely,



Henry A. (Bus) Morris

Responses to Letter 41A (dated 5/1/03)

1. Thank you for your comment on the Wilson Street proposed project and for your suggestion to install a light at Wilson and Haynes and for better signage for the hospital. The City is considering installing traffic lights and signs at various locations in the project corridors as traffic needs warrant. This activity is not included as part of the MDT proposed projects, however.
2. The three proposed projects were documented in one Environmental Assessment in an effort to provide a more streamlined process for the documentation of projects of similar scope and relative magnitude. MDT views the proposed projects as connected or related actions, because the projects include similar design features and are elements of the larger effort to consistently upgrade urban streets to MDT standards.

Comment #41-B

Response to Letter 41B (dated 4/27/03)

RECEIVED

APR 29 2003

ENVIRONMENTAL

HENRY A. (BUS) MORRIS  
304 CHESTNUT AVENUE, F.P.  
P.O. BOX 964  
GLENDALE, MONTANA 59330  
(406) 365-4017 (H)  
(406) 365-3321 (W)

April 27, 2003

MASTER FILE  
COPY

#40B

Jean Riley, P.E.  
MDT Environmental Services  
P.O. Box 201001  
Helena, MT 59620-1001

RE: STPU 8009(2) Stower Street, Miles City

Dear Ms. Riley:

I have previously written two letters regarding issues related to this proposed project. I had anticipated an unbiased review of the issues and their impacts in the Environmental Assessment. Instead, I was confronted with the most slanted presentation I have ever read! It seems that the conclusions were established first and then "documentation" filled in to back up these preestablished conclusions. It didn't matter that this "documentation" was pure fiction in places (such as regarding the school, existing volume of traffic, access, safety, existing road width, cumulative and secondary impacts, etc.) or intentionally misleading (such as the discussion regarding the handicapped parking at the church). There are even discrepancies between the text of the EA and the information presented in the Appendices. The assumption, presumably, is that the readers making the final decisions will have no knowledge of the erroneous nature of the information provided and won't closely examine the detail in the Appendices. They will, thus, come to the same conclusion reached in the EA--no significant impact. What you have produced is the equivalent of an Enron financial statement--pretty in presentation, but completely misleading in content. Taxpayer dollars should not be wasted in this manner, nor should the public and the final decisionmakers be treated with so little respect. We deserve better. We deserve the honest, unbiased, and complete assessment that this process is supposed to provide.

We have owned the home at 517 S. Cale (corner of Cale and Stower) since 1959. We raised two daughters that attended Highland Park School in its earliest years. In fact, our oldest daughter had to attend first grade at Lincoln School because Highland Park School had not yet been constructed. Some things have changed over the years (grades 1-6 then, K-4 now), but many remain the same. The school building, itself, has been enlarged; however, the children enter the building on Cale and Earling as they always have. The designated entries for children are obvious to all--marked by double doors, designated bus and handicapped parking, lettering on the building, and a flag pole in the front on Cale (legal address 716 S. Cale). None of these things

1. Thank you for your comments. Revisions made to the Environmental Assessment text are noted in Section 4, Clarifications to the Environmental Assessment and include additional traffic data and analysis.
2. Revisions made to the Environmental Assessment (EA) are noted in Section 4, Clarifications to the Environmental Assessment. The text referring to the entrance of Highland Park school has been corrected.

## Comment #41-B cont.

exist on Comstock. The only sign there is one identifying the parking lot as being for staff only. The single doors (janitor and gym) are obviously not "normal" entries for children.

2 cont'd

When our daughters attended Highland Park School, the majority of the children walked or rode bicycles to school. A large number still do so, although more are transported in vehicles by parents than were then. These vehicles affect traffic patterns on both Stower and Comstock since parents tend to park as close as possible to where the children enter the school--that is, on Cale and Earling--and, as such, have to travel or cross both Stower and Comstock. A minor number of children are now transported by bus. None were in the "old days." The Stower project will not resolve the traffic issues and may, in fact, be anticipated to make things worse since fewer parents will feel comfortable having their children cross the busy street that Stower will become. This will result in even greater congestion in the area. Our society has been judged to have serious weight problems by much of the media, yet you are denying these children an opportunity to get the exercise of walking or riding bicycles to school.

3

All of the documentation I have seen done by MDT regarding this project fails to note the existing 15 mph speed limit by the school. I am completely bewildered by the omission since, even at my age of 74 (although I do have good eyesight), I can easily observe the posted 15 mph speed limit signs that appear approximately 1/2 block prior to the school on all streets and sides. The EA, in fact, discusses that the City is "considering" a lower speed limit and contains no discussion of the existing one (which I do realize it is the intent to eliminate). Yet, you discuss how much this project will increase safety. The fact is that the majority of the accidents which have occurred at the intersection of Cale and Stower (the corner with the greatest accident rate) have been due to excessive rates of speed. There are no sight distance problems. This has been true from the very beginning, not just for those years you were examining for the EA (1997-1999). A "real" review of the accident reports would have revealed these facts.

4

The EA indicates that the public has been involved in the decision making process. I submit to you that the vast amount of misleading information provided by MDT and the City has made this virtually impossible (not to mention you seem to ignore the real facts when we provide them). First, it was the grand assurances at the public meeting last year that MDT had no knowledge that the "other" side of Stower was on the urban system and there were no plans to build there. I have great difficulty believing that degree of ignorance on MDT's part, and although the EA continues to insist there are no further plans, the Appendices to that document indicate otherwise. Even we "common folk" had enough common sense to know that the traffic had to go somewhere after reaching the intersection of Stower and Strevell (although we hadn't really realized just how much traffic it was going to be). Now, there has been an indication at the public meeting that the trees will be saved by moving the sidewalk. A review of your own maps in the Appendix shows this is complete bunk! The road goes through the middle of the trees. I suspect you are merely trying to keep the public from commenting about the issue while there is time. This is not what the average person would deem to be involving the public--particularly not the public with the most at risk (property owners and residents along Stower). A brief notice on page 2 of the Miles City Star correcting this after the fact will not undo the damage you have already done to the comment and public participation process.

5

## Response

3. Comment noted.
4. Thank you for your comments. Speed limits and corrections to the text in the EA are noted in Section 4, Clarifications to the Environmental Assessment. Specific details on accidents are typically not included in public documents to protect the privacy of those involved in the accidents. Details on the causes of specific accidents may be available upon request by contacting the City.
5. Thank you for your comments. As noted in the response to Comment #1, MDT and FHWA have selected the No Build Alternative for Stower Street and therefore no trees will be removed.

## Comment #41-B cont.

I also resent all of the implications that we have done something wrong by having "improvements" that "infringe" on the right-of-way. We were encouraged over the years to do this. We are no different in our actions than anyone in any other neighborhood in the City. I don't see the City out maintaining their right-of-way by growing grass or shoveling snow--it is the property owner's legal responsibility and duty. Yet, you criticize us because we express concern for the removal of our longtime enhancements to the beauty of the neighborhood which also serve as "buffer zones" to traffic and noise. As far as economic justice and lack of discrimination, please explain why the property owners along Stower who are pretty much your basic middle incomers are criticized for their inappropriate use of right-of-way when the wealthier folk along Strevell are allowed to keep the full right-of-way for their own use and not even have sidewalks that the rest of us might utilize--not to mention they are allowed to have much narrower parking there.

You also didn't address any of the issues on the existing stretch of Stower between Moorehead and Haynes. What about the difficulties the trucks have turning relating to access to the stores (like Albertsons) and both leaving and entering Haynes? What about the fact that the trucks delivering to Albertsons must block Stower in order to back up to the delivery doors? There is no other way for them to access the area. These things have minimal impact now because of the low volume of traffic on that stretch, but they could become real issues if you increase the volume of traffic so drastically. That part of the roadway is to remain essentially unchanged--not even adding sidewalks where there are none (safety issue?). Perhaps your analysis on this is also buried in the Appendices that you apparently didn't think anyone would bother to read. I didn't find it, though.

I did, however, find that the widths provided in your engineers' drawings when converted to feet indicate that our section of Stower already meets the LOS B requirements you detail. Why are you claiming it does not in the text?

I was raised in an agricultural setting in Wyoming at a time when the economic situation was at its most challenging and difficult. We learned to value the resources that we had and to use them wisely. The proposed widening of Stower is anything but a wise use of resources. You are destroying a quiet neighborhood with minimal traffic (since almost all of it is destined for the school, church, or homes unlike the statistics used in your EA which were from the "other" side of Stower across Strevell). You are destroying any safety that may exist for the children and other pedestrians due to this minimal traffic (the real problem being a failure to enforce existing speed limits and pedestrian right-of-way). The mere act of painting stripes on pavement or erecting a crosswalk sign will do nothing to increase safety (and both actually currently exist)--motorists must be motivated to obey the law. This is a costly project to build and there will also be future costs of maintenance. Miles City is not a thriving community. It already bears the scars of countless buildings abandoned as patterns changed over the years (most notably the old hospital and the "Plaza"). Simpler and more economic solutions to traffic issues could surely be found--traffic lights and stop signs, for instance. Using resources wisely by spreading them out means that more areas could benefit. One would hope that engineers would be capable of recognizing these things, but perhaps it takes a bookkeeper to fully evaluate cost benefit issues in a rational and honest manner.

## Response

6. Thank you for your comments. On Strevell Avenue, there is no existing encroachment by adjacent property owners into City-owned right-of-way. The Build Alternative for Strevell Avenue includes a sidewalk on the east side.
7. See response to Comment #1.
8. Corrections to the text in the Environmental Assessment referring to the level of service (or LOS) have been noted in Section 4, Clarifications to the Environmental Assessment.
9. Additional traffic analysis has been undertaken by MDT and is provided in Section 4, Clarifications to the Environmental Assessment. Due to the potential for increases in traffic with the proposed improvements to Stower Street and the public controversy surrounding those increases, MDT and FHWA have selected the No-Build Alternative for the Stower Street project.

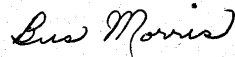
## Comment #41-B cont.

In closing, I would like to pass along a couple of items that are perhaps worth considering. I am proud to be a veteran, as well as having had the experience that comes with the years. People always fight harder to save their homeland, especially their neighborhood. Perhaps that is why we continue to try to point out the truth even though you don't seem to want to listen. Secondly, not all "leaders" are good and honest ones. I realize that some of the "leaders" in the community have provided misleading information (such as the "front" of the school and the increased access to the VA and MCC this is supposed to provide but does not). I also found it strange that many of the comment letters submitted after the first public meeting contained exactly these same errors. You would think that people who had an awareness of the situation and were providing comments that should be considered would have at least checked the facts. Your job, just like that of any soldier or good citizen is to determine what the truth of the matter is and to act in an ethical manner in accordance with your own good conscience and judgment in evaluating the situation.

This Environmental Assessment should not even qualify as a draft EA. There are too many errors and inconsistencies to allow the public to comment and participate in a meaningful manner. I suspect there may be even more in areas I wasn't qualified to evaluate (such as environmental issues). With all due respect, this is anything but a professional job. The public and the final decisionmakers deserved the opportunity to review and comment on a complete and accurate presentation. I have no doubt that the outcome of the assessment would have been much different if you had done the job you should have. The problem, however, is that there may be no way now to undo the damage you have wrought to the public participation and comment process.

As I have stated before, I remain unequivocally opposed to the going ahead with this project.

Sincerely,



Henry A. (Bus) Morris

## Response

10. Comments noted.

11. Thank you for your comment. Revisions to the text in the Environmental Assessment are noted in Section 4, Clarifications to the Environmental Assessment. FHWA and MDT based the selection of the Preferred Alternative on the additional information presented in Section 4 as well as a review of all public comments.

Comment #42

Response

RECEIVED

MAY 05 2003

ENVIRONMENTAL

KAREN L. MORRIS  
P.O. BOX 476  
MILES CITY, MONTANA 59301  
(406) 232-4433

May 2, 2003

Jean Riley, P.E.  
MDT Environmental Services  
P.O. Box 201001  
Helena, MT 59620-1001



RE: Miles City Street Projects - Environmental Assessment  
STPU 8013(1) Wilson Street  
STPU 8009(2) Stower Street  
STPU 8006(1) Strevell Avenue

Dear Ms. Riley:

This letter is intended as a supplement to the 53 enlarged color photographs and 5 pages of text (copy of text enclosed with this letter) which I submitted into the public record at the Public Meeting on April 15, 2003.

There are a significant number of deficiencies in the Environmental Assessment (EA) prepared for these projects. One of the difficulties with the EA relates to the combining of the analysis for the three projects. The combining of the analysis for Wilson Street and Strevell Avenue is useful since these are adjoining projects and, indeed, the impacts are best considered as a whole. The Stower Street project, however, presents significantly different issues. As such, a more accurate analysis of the impacts would have been achieved through the use of a separate document. In addition, there appears to be little controversy regarding the work proposed for the former projects (although some of the information in the EA regarding these is also inaccurate or misleading) and, as such, the separation into two separate documents would be anticipated to facilitate a more rapid finalization of that EA with an eye to completion of those projects.

I have one suggestion for improvement on the Wilson Street project. This would be the inclusion of a traffic light at the intersection of Wilson Street and Haynes Avenue. This light would be of a distinct benefit to individuals, including emergency vehicles, accessing this street where our local medical facility is located. In addition, this traffic signal would undoubtedly provide benefits for traffic flows onto Haynes from Sudlow, Tompy, and Comstock (traffic here coming from both directions).

I have always been taught that it is best to begin any letter of criticism with something positive. In consideration of this, I would like to state that, to the best of my knowledge, the name of

41-1

1. Thank you for your comments. The three proposed projects were documented in one environmental assessment in an effort to provide a more streamlined process for the documentation of projects of similar scope and relative magnitude. MDT views the proposed projects as connected or related actions, because the projects include similar design features and are elements of the larger effort to consistently upgrade urban streets to MDT standards.
2. The installation of a traffic light at Wilson and Haynes may be considered by the City in the future, but it is a separate process from the MDT proposed projects.



## Comment #42 cont.

Stower Street was not misspelled anywhere in the EA. At any rate, I did not note any such error during my extensive review of said document.

I am fully aware that individuals reviewing any comment letter tend to disregard those of greater length. There is, however, simply no way to shorten this letter. There are too many issues that were not addressed in the EA, as well as inaccurate presentation of factual information. There is a great deal of interrelationship between the topics addressed herein, however, I have done my best to break the issues into categories with subtitles in order to assist the reader. Obviously, if I did not feel that my observations and comments had merit, I would not have taken the time to draft this letter. I thank you in advance for your patience and perseverance in examining its content.

### **Factual Errors, Misleading Information, Inconsistencies, and Omissions**

There are numerous factual errors, as well as misleading information, inconsistencies, or omissions in the EA. I addressed several of these with my "Visual Survey" submitted into the public record on April 15, 2003. There are some areas that I am not qualified to evaluate, but the inaccuracies I encountered in those I could evaluate led me to have doubts about the entire document. Specifically, I noted problems with:

- ADT
- Traffic Patterns and Issues (both existing and after the proposed project)
- Safety
- Pedestrians and Bicycles
- Parking
- Access
- Noise
- Drainage
- Right-of-Way
- Street Width
- Visual Impacts
- Existing Entities (such as the school, the church, MCC, the VA, etc.)
- Public Involvement
- Logical End Termini (Segmentation issue)
- Road Condition Evaluation

This letter tries to address at least some of the issues not fully covered before. I have used other subheadings for a more logical presentation (trying to walk the reader through the situation), but the issues above are described therein.

## Response

3. Thank you for your comment. Revisions to the text in the Environmental Assessment are noted in Section 4, Clarifications to the Environmental Assessment.

## Comment #42 cont.

### Existing Character of Streets in the Area:

I am assuming that you have a map of Miles City available, but I would like to offer some additional observations (most of which can be obtained from merely driving the streets) that should have been noted during the field work for the EA. These items do not appear on any map, but have definite significance in considering the issues and impacts.

- **Tompy.** Tompy was not specifically discussed in the EA, however, it is useful to note that there was considerable discussion (perhaps much unofficial) regarding it being an alternative route preferable to Stower. In fact, a significant number of the comment letters in favor of the Stower project were written by residents living on or near Tompy. From Haynes Avenue to Strevell, all side streets yield to Tompy (with yield signs posted). There are stop signs on Tompy at Strevell (2 way stop). From Tompy to Montana, once again, all side streets yield to Tompy with posted yield signs. No ADT was presented for Tompy, so it is not possible to address how heavy the traffic is here (other than comment letters indicating "heavy traffic" and, without knowing the point of reference used, this is not usable for statistical purposes). With the exception of the portion along Haynes, this is a residential area. Observation seems to indicate that the majority of traffic relates to residents within the general area or individuals traveling to that area for some purpose (visit or rummage sale, for example).
- **Comstock.** From Haynes Avenue to Strevell, all intersections on Comstock are controlled intersections with stop signs posted on the side streets. At Strevell, there is a 4 way stop. This is as would be anticipated since Comstock bore the urban route designation until the Transportation Commission approved the functional classification change to Stower from Haynes to Strevell on March 24, 1999. From Strevell to Montana, all side streets yield to Comstock with posted yield signs. Other than the section toward Haynes, Comstock is a residential area. No ADT was presented for Comstock, so it is not possible to accurately assess how heavy the traffic is here. There are certain periods of "high" traffic volumes when parents drop children off or pick them up from Highland Park School (the actual pickup and drop off normally occurring on the side streets of Cale and Earling, but traffic must cross or use Comstock to access these two streets--either in arriving or leaving). The faculty parking lot and Highland Park School gymnasium are along Comstock (neither being a "normal" entry for students). Most of the traffic (other than school related) is due to residents in the immediate area. There is some additional traffic on the portion from Strevell to Haynes generated due to neither Brisbin nor Stower being through streets. From personal experience, the only difficult time to make a left from Cale onto Comstock is during the school traffic peak times. At other times, I seldom have to wait for any vehicles at all.
- **Main Street.** Main Street bears the designation of being a primary route since it is Highway 59 and Historic 212. Significant construction occurred on Main Street subsequent to the presumed timing of the consultants' field work. These improvements may need to be considered in evaluating the traffic situation on Main. In addition, the 4 way stop at Main and Strevell was changed to a 2 way stop with Main becoming the through street. There are only a few alleys entering Main, and part are from one side only (i.e., no alley on the other side). From my survey this morning, it appears that trash service is provided from the alley to the rear which does not go all the way through to Main. I have not, however, confirmed this observation with the local providers of trash pickup. Main from Haynes to the underpass is "mixed" in nature (i.e., both residential and business).

## Response

4. Thank you for your comment and for sharing your thoughts related to traffic circulation in Miles City. Additional traffic information has been provided by MDT since the Public Hearing and is presented in Section 4, Clarifications to the Environmental Assessment. This information includes verification of ADTs. Traffic counts for the entire length of Stower Street, from Main to Haynes are also provided in Appendix E. We have also noted speed limits in the Section 4, Clarifications to the Environmental Assessment.

## Comment #42 cont.

## Response

(Response to Comment #4 presented on previous page.)

- **Stower.** Stower must actually be divided into 4 segments for purposes of analysis since each segment has distinct characteristics.
- **Stower from Strevell to Eighth to Main (in the form of Eighth).** This segment of Stower and Eighth to Main was on the urban system prior to March 24, 1999. I do not know exactly when this designation was made, but I would suspect it has been in place for a considerable period of time. As would be anticipated, all intersections on this segment are controlled intersections (side streets have posted stop signs) from Strevell to Bridge (4 way stop at Strevell, all other intersections being 2 way stops). At Bridge, Eighth yields to Bridge which is the designated truck route. There is a traffic signal at the intersection of Eighth and Main. There are alleys at every half block which are used by the garbage collection services (i.e., trucks cross Stower on the alleys), as well as many residents. As would be anticipated, there is a moderately high amount of traffic on this segment (high in comparison to the side streets, low in comparison to Main Street) due to the railroad crossing on Eighth being used by many of the residents in the area. The ADTs used in the EA are from this portion of the street which is outside the current proposed project limits (this being conceded at the public meeting held February 28, 2002). As an older street (much of it showing as being developed on the Sanborn map of August 1928), it is lined with old growth trees. This is a residential area until the area around the railroad crossing (i.e., entry into the downtown area).
- **Stower from Sewell to Strevell.** This is a portion of the segment that was added to the urban route March 24, 1999. There is a dead end at Sewell (which is a narrow one way street headed away from MCC and toward Comstock). From the middle of the block between Sewell and Earling to the middle of the block between Cale and Stacy is a posted 15 mph speed limit. (All schools and parks in Miles City currently have a posted 15 mph speed limit even though the City does not have a supporting ordinance on the books. This signing was put in place as part of a federal signing project at the time State Code provided for such a speed zone--somewhere around 30 or more years ago.) The remaining portions of this segment all have a 25 mph speed limit (as does the majority of Miles City--which is also in accordance with State Code). There are no controlled intersections in this segment. All intersections are "first come/first served" and "supposed to yield to the vehicle on your right" intersections (which has not always been successful as evidenced by the number of accidents occurring here). As the uncontrolled intersections indicate, this is a destination neighborhood, with the "normal" destinations being Highland Park School, the First Lutheran Church, and the various residences. There are no businesses here. There are alleys at each half block (except the school and church) which are used by the garbage collection services, as well as many of the residents. There is daily and seasonal variation to the traffic, as would be anticipated with the school and church being the major traffic generators. The actual ADTs for this portion of the street were taken (the counter being located at the alley between Strevell and Stacy); however, they were not used in the EA, nor does there seem to be much success in obtaining them. As indicated in my five page summary, 20% would appear to be a generous estimate for the ADT. In other words, an ADT of 474 for 2002 would be closer to reality, but probably still on the high side. (It is interesting to note that Walter M. Kulash, in his book **Residential Streets**, shows local streets as having an ADT range of 400-1,500 and residential collector streets as having an ADT >1,500. There is a high probability that this segment barely meets the definition for a

4  
Cont.

## Comment #42 cont.

local street and no doubt that it fails miserably in achieving the traffic levels required for designation as a residential collector.) Further indication of the lack of traffic can be noted in the photographs that I submitted at the public meeting, as well the photographs in the EA, itself.

- **The Field.** This is the area between Sewell and Moorehead. This is also a portion of the segment that was added to the urban route March 24, 1999. As would be anticipated, there is no traffic at the present time (unless you wish to count the two horses, their owner, and his dog--with perhaps a few rabbits visiting, on occasion). The field has provided a buffer zone for the residential area from both the noise and traffic which occur on Haynes. This has been an ideal situation because of the elementary school. I am not aware of any plans for development of the field at this time (the plans indicated at the public meeting in February 2002 having "fallen through").
- **Moorehead to Haynes.** This is the final portion of the segment that was added to the urban route March 24, 1999. The traffic in this area is a combination of delivery trucks (semis) for the stores in the area and vehicles accessing the shopping areas on Haynes or headed to MCC. There is normally minimal traffic on this street. The semi trucks delivering to Albertsons block the street for a period of time as they back into the loading dock (no other access available). This block is commercial in nature (Albertsons on one side, Steadman's Hardware on the other).
- **Strevell.** This is the "cross street" which serves as a connector from Main to Wilson (extends further on each end, but that is the only portion considered here). Strevell is also on the urban system and, of course, a portion of this street is evaluated in the EA as the site for a proposed project. Strevell is basically a "through" street. There are, however, 4 way stops at Comstock and Stower, as well as the 2 way stop (Strevell being the "stopped" street) at Main. The vast majority of the traffic from Stower (Eighth to Strevell section) turns onto Strevell. This traffic then is dispersed to its various "end destinations" via the other streets along the way. It is interesting to note that the ADT used for Strevell in the EA is 790 for 2002. This would seem to indicate that the concept of taking the traffic count within the project limits is understood. Had the traffic count for Strevell been taken in the area of Stower (i.e., outside the project limits), it would have been significantly higher (the ADT used for Stower being 2,370).

4  
Cont.

### Design Difficulty

A review of the map shows the obvious design difficulty with selecting any existing street between Tompy and Fort as an alternate route to the downtown area. After crossing Montana, the streets are all at an approximate 45 degree angle from the prior "grid" streets. This is due to that area having been developed for the particular stretch of the railroad it runs along. Regardless of which existing crossing (Fourth, Eighth, or Tenth) you would choose, you would still have hazardous intersection issues to confront. In addition, this entire area is residential in nature and there are other schools and parks to factor in as safety issues.

Considering not only the difficulties the layout of the town provides in this area, but also the nature of the area (residential with schools and parks), it would seem more prudent to examine alternatives for addressing traffic issues other than carving out a major arterial using any of these

5

## Response

(Response to Comment #4 presented on previous page.)

5. Thank you for your comments.

## Comment #42 cont.

streets. In addition, alternatives to major roadways may be much more economical to implement and maintain. First, of course, it is helpful to try to define and understand the issues.

The primary issue seems to be the concern regarding the traffic on Main (between Haynes and the underpass). My observation is that traffic here is heavy at times (such as lunchtime when the high school students travel to Haynes to the fast food restaurants). In addition, semi trucks (including those with "pups") that are "passing through" (versus delivering some product in the area) are frequently seen on Main. Main is a highway and should be anticipated to have a greater amount of traffic, but none-the-less several measures would seem available to address the traffic flow problems. Consideration should be given to the installation of traffic lights. At the intersection of Strevell and Main, this could be done using urban funds (assuming the City has not gone "in debt" for several years with the building of Stower). Some sort of traffic signal should also be considered at the underpass and perhaps in conjunction with the intersection at Haynes (which could also be used to stop traffic for emergency vehicles entering Main just beyond that point). Traffic signals can be timed to monitor the flows of traffic (i.e., leaving "free flow" on Main unless there is side traffic to cross) and also provide a means for pedestrians to cross the street safely. The City should study the feasibility of a bypass route for the trucks (which would serve to remove them from Main, as well as preventing the use of a residential area for their transit). I am certain that professional traffic engineers could come up with even more ideas for smoothing the traffic flows in a safe manner.

The second issue seems to be access to Haynes Avenue. The current problem, of course, is that traffic builds up on Haynes (also a highway) so that it is sometimes difficult for vehicles to access that street. Hence, the attraction of the traffic light at Stower (and a connecting street) as a means of getting onto Haynes. This solution may not be as ideal as it initially appears. First, the timing of the light would have to be changed (longer "green" for the Stower portion) which would result in the backup of more traffic on Haynes perhaps blocking access at Comstock (including from the Michael's Addition) and the streets beyond. A more beneficial solution would appear to be a traffic light at each end of Haynes (the one at Main addressed in the prior paragraph and the one at Wilson recommended at the beginning of this letter). With the three lights being timed properly, traffic could access Haynes from any of the adjoining streets (Comstock, Tomy, and Sudlow). The existing dispersion of traffic would continue to exist (but with much better access) and no "bottlenecks" or excessively heavy traffic would be generated on any one residential street.

It has been difficult to determine exactly who settled on the concept of Stower Street as being the answer to the traffic issues, but this determination was made many years ago (1984) and there have been significant changes in options available for maintaining traffic flow. In addition, considering the individuals who appear to be most involved with the promotion of the project, I would suspect no professional traffic engineer was ever utilized to really analyze the situation to determine the best solutions. I have even found myself realizing there are far more consequences to this project than I ever anticipated in the beginning. There also seems to have been a great deal of focus on East-West traffic flows without considering North-South. This lack of addressing North-South issues may have actually increased the East-West problems (as people try to utilize some roundabout means to finally achieve the simple left turn or crossing they actually desired).

## Response

(Response for Comment #5 provided on previous page.)

5  
cont

## Comment #42 cont.

### Street Width

The EA is not consistent in its presentation regarding the existing width of the street (nor the proposed, for that matter). Using the measurements in Typical Section No. 1 (Appendix B), I was able to satisfy myself regarding what is proposed, including the widths of the various elements. I confess that I converted it all to feet since I, like most people, am not comfortable with conceptualizing measurements in metric. The total street width will be 44.29 ft and is comprised of 23.62 ft of travel lanes, 19.09 ft of parking, and 1.58 ft of curb (the gutter being included in the parking).

The existing paved street width (also Typical Section No. 1) is shown as a total of 9.44 m which converts to 30.97 ft. In addition, we currently have curb and gutter which totals approximately 4 ft (2 ft each side). Our total existing width is, thus, approximately 35 ft (actual calculation 34.97 ft). Table 1 on page 13 of the EA compares the existing roadway without curb and gutter to the proposed roadway excluding only curb--apples and oranges. In "Improving Roadway Deficiencies" on page 5 of the EA, the present paved surfacing width is indicated to be 26 ft. I couldn't even back into that one so I must conclude it is a different street. Further, that section indicates that MDT design criteria for LOS B is 28 ft, which justifies the widening being proposed (since existing is shown as 2 ft less). I am not certain what the 28 ft width includes or excludes (i.e., gutter and/or curb), but even our current paved width alone is 30.97 ft--nearly 3 ft wider than required! The work done by John Axline in Appendix C indicates a roadway width of 34 ft. This would be consistent with my calculations, assuming the curb was omitted.

On April 20, 2003, I sent an E-mail to Darrin Grenfell, FHWA, requesting clarification regarding the width issue or where my computations might be in error. Mr. Grenfell is one of the individuals indicated in the EA as a contact for additional information. I am confident that I used the correct address, since I had provided him with additional clarifying information earlier (related to the public meeting) and received a reply. I specifically indicated I was seeking the information for preparation of my comment letter. To date, I have received no response.

Due to the lack of response from Mr. Grenfell, I went in search of a 50 or 100 ft tape measure. I enlisted the aid of a couple of neighbors and measured the street width (including curb and gutter) at one location on each of the blocks except the one between Stacy and Strevell. On that block, I took a measurement at each end since there were two separate paving projects involved. In addition, I took a measurement across the street (i.e., the "other" side of Stower) to determine if Stower truly was wider on the other side. The results of all of my measurements were approximately 35 ft (a couple were actually a few inches wider) leading me to conclude that the presentation in Appendix B is correct and the text (except for Appendix C) is inaccurate.

### Additional Issues from Appendix B

My review of the information in Appendix B brought a couple of other issues to light. Both the Appendix and the text indicate that the existing Right-of-Way is 68 ft. (Actually, by converting to

## Response

6. See response to Comment #1

Darrin Grenfell of FHWA asked MDT to respond to the April 20<sup>th</sup> email from Ms. Morris on April 21<sup>st</sup>. Ray Mengel of MDT subsequently responded to Ms. Morris via email on April 25<sup>th</sup>. The full text of both emails is contained in Appendix B.

The roadway measurements have been clarified in Section 4, Clarifications to the Environmental Assessment.

## Comment #42 cont.

metric, the Appendix overstates the actual right of way by .24 ft.) I added the total construction width (44.3 ft) plus the total width of the sidewalk (10 ft) for a total proposed construction width of 54.3 ft. Next, I added in the construction permit width indicated at 3 m on each side (total 6 m or 19.69 ft). The grand total construction zone per these items is 73.98 ft. In other words, there is a shortfall of 5.98 ft from the existing Right-of-Way. The public has repeatedly been assured that all work was being done in the Right-of-Way. That is certainly not what this computation suggests. In my aforementioned E-mail to Mr. Grenfell, I also asked for clarification on this issue, including how much damage the property owners should anticipate to their personal property. As indicated above, I have had no response to this E-mail.

The map in Appendix B also indicates that the trees will be severed in the middle of their trunks. My experience is that, when a tree is severed vertically, it generally dies. Based upon my physical verification of the measurements (which agree to the map), I must conclude that the information presented at the public meeting on April 15, 2003 was in error. At that meeting, we were told that the sidewalks would be moved (i.e., leaving a boulevard) so that the trees could be saved. It does not appear to matter where the sidewalks are located. The trees are doomed. In my E-mail which was unanswered, I also included a question for Mr. Grenfell regarding just which trees would be saved by moving the sidewalk. I confess that I find myself wondering if this "saving of the trees" effort was presented to the public (and reported in the Miles City Star) in an effort to minimize the comments objecting to the project (since many people were concerned about the trees). While the EA maintains that the "changes to the visual environment" are "not considered to be major," I would suspect that most residents would consider removal of all of the trees to be a significant change not only to the visual environment, but also affecting other factors such as shade, noise reduction, etc.

The final items I requested clarification from Mr. Grenfell on in Appendix B were with regard to the information in the Design Data box (first map). I understood the 2002 ADT of 2370 since that was what was presented in the text (even if it is inaccurate for this portion of Stower). I was puzzled, however, as to why the 2022 ADT used was 3520. The text indicates this is the ADT for the no build alternative (Table 2, page 18). I was not certain exactly where the DHV of 350 came from or how it was computed, but guessed it might have something to do with the hourly vehicles in the design year. I was not certain about the T = 3% and offered a guess of truck. I was relatively certain that V at 50 km/h was the speed at 30 mph. I also requested clarification on the 80 kN ESAL'S = 29.68. No clarification was provided on any of these issues; however, I was told by another source that the 80 kN ESAL'S had something to do with 80 ton trucks. This is definitely of concern in a residential area with the project bordering a school.

### Logical End Termini/Segmentation

From the very beginning, we have been emphasizing the need to be forthright about the full intent of the project and to examine the full length of the anticipated project (Haynes to Main) to consider all impacts and avoid segmentation. At the public meeting in February 2002, Bill McChesney, MDT, indicated that only this small section of Stower (Haynes to Strevell) was on the urban system. In his letter to me dated May 6, 2002, David Galt, MDT, indicated that this

## Response

6. Please see response on previous page.

7. The text on visual impacts has been revised, as provided in Section 4, Clarifications to the Environmental Assessment. Also, the preferred alternative for Stower Street is the No-Build Alternative and therefore no trees are impacted.

8. The numbers provided in the Design Data box shown on the conceptual plans for the Build Alternative in the Environmental Assessment relate to design parameters. ESAL means equivalent single-axle load and relates to designing the pavement.

See response to Comment #1.

## Comment #42 cont.

was an oversight on Mr. McChesney's part. I can only conclude that Mr. McChesney must not read his mail since he received a carbon copy of the April 28, 1999 letter to George Kurkowski (then mayor of Miles City) which indicated on its attachment that this was an extension of the existing urban route. Regardless of knowledge, the damage was done in his initial presentation at the public meeting. This was never corrected, to the best of my knowledge.

The Secondary and Cumulative Impacts section (page 37) indicates that no other City or MDT projects have been identified as occurring within the vicinity of this project. In reading Appendix A, however, I noted three separate pieces of documentation indicating the plans for eventual construction all the way through Main (December 15, 1988 City County Planning Board minutes, March 2002 letter from George Luther, and John Marks' January 8, 1999 letter). This was particularly interesting to me since, if my notes from the public meeting are correct, John Marks was responsible for drafting this particular section. Perhaps he did not read the letter he wrote? In addition, my letter to David Galt, dated April 18, 2002, included in the attachments both a copy of John Marks' January 8, 1999 letter and his August 24, 2000 letter. On both of these, I highlighted in blue the sentences regarding the intent of the project to extend to Main. It is hard to believe that someone somewhere didn't pick up on the full extent of the plans. Maybe no one at MDT reads their mail carefully.

It is interesting to note that several of the comments received indicated that the traffic light was the reason that Stower had to be extended through. With hindsight, I suppose one could say that the traffic light was truly the first "segment" of the project. A traffic light alone, however, is not adequate to justify a project. The error (perceived or reality is not important here) should not be repeated again. There is no doubt that this significant widening of Stower (27% according to my computation using correct roadway widths--versus the "minor widening" terminology used in the EA) will impact the remaining portion from Strevell through Eighth to Main. The increase in traffic alone will be significant (see below for further discussion). In addition, that portion of roadway appears to be no wider than this one. Eventually, it will have to be widened to carry the proposed traffic burden. More trees will be lost. There are historic structures to be evaluated for impacts, as well as significant safety issues to be addressed. The time for doing the assessment is PRIOR to beginning any project which virtually ensures the remaining work must be completed.

### Actual Traffic Increase/Change in Pattern

As indicated earlier, the ADTs used for this portion of Stower were approximately 80% in excess of reality (estimated at 474 vs. 2,370 used in the EA). The EA indicates a 50/50 split for Main and Stower in the design year (2022). Reality is, once Stower Street is opened up, immediate increases in traffic loads must be anticipated. What the EA fails to address is the issue of traffic moving over from other streets (from Wilson through Main) to utilize the only traffic light. The various people sending in comment letters certainly anticipated this change in traffic pattern (perhaps suggesting they would be a part of it), although none recognized the full impact of ALL the streets shifting over (only being concerned with reducing traffic loads on their individual streets). This is highly likely if the traffic situation on Haynes is not addressed in some manner (e.g., with signals at Wilson and Main) simply because vehicles on these other streets will not be

## Response

9. The City has discussed eventually improving the entire length of Stower Street, in addition to other streets in the Urban Street network. However, there are currently no projects planned for Stower Street west of Strevell in the foreseeable future. No other projects affecting Stower Street or the intersection at 8<sup>th</sup> and Main are planned or funded for the near future. Please see Section 4, Clarifications to the Environmental Assessment for the revised cumulative impacts text.



## Comment #42 cont.

able to access Haynes. At least a portion of this flow of traffic would be anticipated to be on Cale and Earling--the two streets where children actually do enter Highland Park School.

In addition, human nature is such that people tend to use the first available alternative to reach their destination. The first turnoff to the downtown area will be Stower. It should be anticipated, therefore, that the majority of the vehicles may select that option.

There were no ADT figures given for the other streets nor do I know how many cars from Haynes would have a downtown destination, so I would not even attempt to hazard a guess as to what the actual impact would be. The minimum impact is startling enough. Using the 2002 ADTs for Stower and Main (2,370 and 9,380, respectively) and assuming that only half (probably low as discussed above) select Stower, the anticipated traffic load for Stower upon opening would be 5,875. This is an increase of 5,401 vehicles (based upon the 474 which is probably high). In other words, Stower can anticipate an increase in traffic of 1139.45%! I have great difficulty in reconciling this to the concept of no significant impact as detailed in the EA. To me, it appears that this proposed project is changing the character of a street that barely meets the requirements of a "local street" (if it does at all) into an "arterial street" (significantly more traffic than an urban collector, yet this street does not contain any of the commercial ventures anticipated to be found on an arterial).

### Access

The EA indicates that the Stower Street project will increase access to the VA and to MCC. This concept was also supported in some of the comment letters received in favor of the project. If you consult your map, you will note that MCC is located on Dickinson. The streets currently providing access to Dickinson in this neighborhood are Moorehead (from the Haynes side) and Cale and Earling (from the Stower side). Sewell is a one-way street going in the wrong direction. If Stower Street is "opened up," access remains exactly the same--Moorehead, Cale, and Earling. In addition, noting the tendency of individuals to select the first available street, vehicles approaching from Haynes will still utilize Moorehead. As for the VA (which currently has minimal activity), Cale is the street of option from this direction. No additional access is provided by opening up Stower. Neither entity will be magically transported to a location closer to Stower with the opening up of the roadway. In fact, both the VA and MCC are more directly accessed from Main (which is closer). My only conclusion is that the supporting letters from these entities were hoping to eliminate any additional traffic load they might bear from the public by shifting it to Stower. I certainly hope they were not planning to follow the one writer's intent of instructing all of her clients to take a left at the light and a right on Sewell (the wrong way on this one way street). Much of the traffic in this area is actually generated by MCC and should not be anticipated to go away.

## Response

10. MDT reexamined the traffic data and analysis after the public hearing, and has provided additional information in Section 4, Clarifications to the Environmental Assessment and Appendix E.

11. Thank you for your comment. See Comment #23 for letter from Miles Community College.

## Comment #42 cont.

### Safety Issues

A) The corner of Cale and Stower has long been a "problem child" in the world of vehicular conflicts. I have witnessed first hand exactly how far a car can travel upon impact (frequently off the roadway and onto property). The EA discussed how sight distance would be improved with this project, thus minimizing accidents. As documented in the photographs I submitted, there is no sight distance problem in this area. The problem is speed (frequent failure to follow the posted limit). A complete review of the accident reports would have disclosed this. Since people tend to set their speed based upon roadway conditions (rather than the posted limit), it should be fully anticipated that this project will serve to increase rather than decrease vehicular conflicts (especially since there will be significantly more vehicles on Stower).

B) Many drivers in Miles City seem to have a difficult time acknowledging pedestrians. As a frequent pedestrian, I have experienced the problem first hand. The same experience may also explain why the children walk until they reach the roadway and then run as fast as they can to get across. In the comment letters, the difficulty of pedestrians trying to cross Main was discussed. This should have given the drafters of this EA some insight into the mindset and driving habits of Miles Citians. The simple act of painting stripes (a crosswalk) on the roadway will not motivate these drivers to stop for pedestrians. In addition, it should be remembered that this project borders one side of an elementary school (which Main does not). Highland Park School currently teaches grades K-4, but current plans are for K-3 beginning with the next school year. The younger children currently attending Lincoln school will be coming to Highland Park instead, and the fourth graders from here will go to Lincoln (becoming a grade 4-6 school). This means there will be an even greater number of small children with the need to cross Stower safely.

### Emergency Vehicles

I found the section of the EA regarding the improvement of access for emergency vehicles a bit mystifying (as were a few of the comment letters). The Fire Station is located on Main (just a short distance off of Haynes). I cannot understand how a right turn on Main, another right turn on Haynes, and a final right turn on Stower (after traveling a distance) will improve access over a simple left turn on Main. Perhaps what is really needed is either a traffic signal at Main and Haynes (discussed earlier) that could be turned red or a simple "change to red" light by the fire station. It must be remembered that only this small portion of Stower will be significantly wider. In addition, there are no controlled intersections here (contrary to the belief of one emergency service provider). The remaining section remains in its current condition, including the railroad crossing (not an over- or underpass despite that being the eventual "plan"). It is hard to believe that an emergency vehicle would choose a route requiring them to wait at such a crossing, perhaps for an extended period of time. Finally, it should be remembered that the hospital is on Wilson (also being improved). Stower and Wilson are parallel streets. I suspect that these individuals, well-intentioned though they might be, did not fully examine the actual parameters of the situation and what benefit, if any, it would truly represent.

## Response

12. Comments noted.

13. Thank you for your comments.

For comments from the Fire Department please refer to Comments numbered 11, 13 and 47.

A traffic light (at Main and Haynes) may be considered by the City at a future time, but it is not included as an element of the MDT proposed projects.

## Comment #42 cont.

### Funding Issues

There has been considerable misinformation and confusion over the funding issues related to these projects. It was presented at the public meeting in February 2002 (MDT transcript, page 27) that "The federal funds and the state funds are here now. They might not be there in the future." Also, as I pointed out in my comment letter dated March 29, 2002, this same information was verbally given to me. I did the computations and found, at that time, that there was a funding shortfall (borrowing from the future) of approximately \$885,000 if all three projects were completed and a still a funding shortfall of approximately \$335,000 if Stower was a no build alternative. I know there have been some changes in estimates since I completed this analysis, but I believe they have all been in the direction of increased costs rather than increased funding. The fear of losing funding was mentioned in the comment letters; however, the EA failed to note the public's concern about this issue as being a reason for completing the project. 14

The acquisition of right-of-way for the field was not included in the draft 2003-2005 STIP (although it was in the 2002-2004 final STIP). I discussed the matter with Jeff Ebert, MDT in Helena (telephone and E-mail). After a considerable delay and repeated requests, I was informed that it should have been included and would be in the final STIP (E-mail dated August 20, 2002). It is not. Considering another conversation I had with MDT in Helena regarding normal "debt" levels approved by the Transportation Board for Urban Funds, I was left wondering if this omission was intentional. 15

The other funding issue that has yet to be addressed to my knowledge is how to complete the remaining portion of this proposed arterial link between Haynes and Main. Appendix A indicates that an underpass is proposed for Eighth Street and this is a very expensive proposition. The only location in Miles City that was a finalist in the MDT railway grade separation analysis was the crossing at Leighton Blvd. (A fact not included in the EA. I am not, however, aware of the final results of the study since I have not seen anything published yet, despite being on several mailing lists.) Then, there is the matter of the probable necessity of condemning a house (sight distance problem at the intersection of Stower and Eighth), as well as all of the other roadway costs. The Urban Funding pot does not appear to be adequate to timely address the safety issues that will simply have to be addressed if the project is completed as proposed. The traffic issues will be immediate; however, the funding possibilities that I am aware of would be a long way in the future. Is this responsible planning or an adequate consideration of public safety? 16

### Trucks

Another concern that has been paramount in the minds of the citizens (both those for and against the project) is the issue of trucks. I don't have any answers, but I will present the factors I am aware of and let you draw your own conclusions.

- At the public meeting on February 28, 2002, Rick Newby, the former Chief of Police, voiced his concerns regarding the use of the roadway by semis. In his opinion, a sign would not stop the trucks from taking the wide street at the traffic light. He pointed out the safety issues

## Response

14. Beginning FY 2004 (October 1, 2003), Miles City's Urban fund balance equals \$912,389. The estimated cost of all three (3) projects is \$1,325,000. The City of Miles City and Custer County would need to borrow approximately \$412,611 of the urban program. Currently they receive \$208,293 per year in urban funds. If the City and County elect to borrow to complete the three (3) proposed projects, they would need to borrow approximately 2 years of allocated funding. At public meetings it has been presented that once the final design is completed and an updated cost estimate is developed for the three projects, the City and County would determine if they wanted to borrow funds on future allocations. However, since MDT and FHWA selected the No-Build Alternative as the preferred alternative, funding is not needed for the Stower Street project.
15. Sometimes when projects are being developed, final determination of project involvement may not be defined when the STIP is produced. Once additional involvement is determined, the STIP is updated and current project activities are included. In this case, since the preferred alternative is the No-Build Alternative, the STIP would not need to be updated for Stower Street.
16. The Leighton Boulevard crossing from MDT's Statewide Rail/Highway Grade Separation Study has been identified in the secondary and cumulative impacts of Section 4, Clarifications to the Environmental Assessment. This study is available by contacting Kris Christensen at 444-9240 or [krchristensen@state.mt.us](mailto:krchristensen@state.mt.us).

## Comment #42 cont.

related to those trucks, including those on the remaining portion of Stower which would not be widened (MDT transcript, page 36).

- In response to Laura Nagel's question regarding the use of the roadway by semi trucks at that same meeting, MDT responded that even if the city passed an ordinance to designate the route to keep trucks off, they would still use it. It would become an enforcement issue and there are limited resources (MDT transcript, page 48).
- Within the comment letters in favor of the project are references about the connection Stower would provide with Seventh Street downtown. Stower actually connects to Eighth. Seventh Street is Highway 59 and a truck route.
- There was discussion at the public meeting for the two Tongue River Bridge replacement projects (March 11, 2003) about the possibility of leaving the Pacific Avenue Bridge as the designated truck route even after the Main Street Bridge was completed. Pacific Avenue ends at Eighth Street near the railroad crossing (intersection included in the photographs I submitted).
- The EA indicates on page 20 that the "City has no plans to consider promoting Stower Street as a freight truck route"; however, it provides no indication that any actions will be taken to prevent this from happening. In addition, considering the misleading information that has been provided regarding this project, it is sometimes difficult to give credence to any vague assurances that may be given.

### Parking

The EA discusses the lack of and implied need for designated parking in the project areas. I was quite mystified because the majority of Miles City residential neighborhoods do not have designated parking and, although I have seen a lack of parking close to an event such as a rummage sale, I have never seen problems because parking was not "designated" parking. I still maintain that our parking situation is fine without any special designation. In fact, I included photographs to document the actual parking patterns both at the school and the church in my submission on April 15, 2003.

Subsequently, a new interpretation of this concept has been explained to me (information from another State Highway Department). This interpretation is that, if parking is not "designated," it is then a no parking area. This provides for a wider roadway and for bicycles to have full use of the parking lane (since no bicycle lane is provided). I am even less fond of this explanation. Many of the homes were built prior to current code requirements for greater distance to the property line. I don't believe it was ever anticipated that the right-of-way would be used as a roadway. With the proposed widening project, the driveways at some of these homes are no longer usable (unless the sidewalk is blocked). Where are these people supposed to park at?

Accuracy would not be served in this area, of course, if I did not highlight the situation regarding handicapped parking at the First Lutheran Church. On page 22, the EA indicates that, "No formal handicapped parking is provided in front of the church. The proposed project could include the provision of formal handicapped parking spaces." The statement is completely accurate. The church has no handicapped parking on Cale, in front of the church. The implication, however, is

## Response

- 17
17. The text in the Environmental Assessment for the Build Alternative for Stower Street has been revised as noted in Section 4, Clarifications to the Environmental Assessment. However, it should be noted that MDT and FHWA have selected the No-Build Alternative as the preferred alternative.
- 18
18. Thank you for your comments. Changes to the text on page 22 regarding handicap parking have been included in Section 4, Clarifications to the Environmental Assessment.

## Comment #42 cont.

that the church has no handicapped parking at all--which is not correct. The church has three designated handicapped parking spots in the parking lot in the back and one along Stower (the back of which appears in the photograph in the EA on page 8). On Palm Sunday, when I took my photographs, only one of these handicapped parking spaces was in use. Perhaps it would be helpful if color copies were used so that the blue curb would be visible and such foolishness would never be put in print.

### Comment Letters

I have reviewed all of the comment letters submitted at or after the February 28, 2002 public meeting that I was able to obtain from the Glendive District office. They were unable to locate all of the documents (even after several requests and attempts on their part). I am aware that I am missing certain items (such as Rick Newby's 21 safety issues and the signed petitions), but I have no way of knowing exactly how complete or incomplete my records may be. I do have copies of all of the letters submitted to Senator Baucus in my mailings. Considering the number of signatures on the petitions (which contained detailed reasons so many of these people would not have submitted letters) and the number of people voicing an opinion in opposition to the project at the public meeting (some of whom did not write an additional letter) in conjunction with letters submitted, I was not able to determine an overwhelming positive response to the project as was indicated in the EA.

I analyzed each letter not only with regard to content (including the individual's home address), but also with an eye to what information it might provide in addition to what it actually says. As an example, my comment previously about what the letters indicated regarding Miles Citizens' driving tendencies. I would suggest you might find a similar analysis enlightening.

Several "trends" were observed. Among these, the majority of the letters in favor of the project were from individuals who perceived a personal benefit from the project--the most common ones being removal of traffic in front of their own homes or NIMBY ("not in my back yard" from individuals living on or close to streets they presumably perceived might be developed if Stower was not). There was a remarkably high incidence of errors in describing the project area and impacts of the project. The easiest to identify, of course, was where they were indicating the "front" of Highland Park School was on Comstock and that was where all of the parents dropped off the children. Perhaps they adopted this erroneous idea after Mr. McChesney expressed it at the public meeting on February 28, 2002. After all, he had gone into great detail about his familiarity with the area (MDT transcript, page 39). There were even three letters that felt the project should be built because they felt animosity toward one of the residents living here (doesn't do much for their credibility). On the other hand, some of the letters in favor of the project expressed concern for the neighborhood and included contingencies such as maintaining the 15 mph speed limit by the school, installing stop signs or traffic lights there, and ensuring that trucks did not use the route. Perhaps these letters would have to be moved to the "against" category since their contingencies do not appear to have been met. The letters against the project seemed to me to have a better concept of the actual issues that should be addressed. They seemed to be

## Response

19. Due to the potential increase in traffic with the proposed improvements to Stower Street and the public controversy surrounding those increases, MDT and FHWA feel there may be considerable impacts associated with this project and have selected the No Build Alternative for the Stower Street project. The traffic analysis in Section 4, Clarification of the Environmental Assessment can be consulted for more details.
20. Information on the school was revised in Section 4, Clarifications to the Environmental Assessment.

## Comment #42 cont.

familiar with the details of the current situation (such as indicating what streets children were dropped off on for the school--Cale and Earling).

### Additional Issues

This letter has already grown far beyond the length I had anticipated at the beginning, but I would like to present a few additional issues that perhaps should be addressed.

- How would garbage service be accomplished if the trucks could no longer cross at the alleys (due to traffic on Stower)?
- A higher amount of traffic on Stower would mean less people would allow their children to walk/ride bicycles to school--thus resulting in higher traffic levels in the area (affecting Earling, Cale, and Comstock, at a minimum). In addition, children headed to other schools (such as Lincoln) would face safety issues in trying to cross on the "other" side of Stower. It is worth noting that the Miles City School District tries to minimize the number of children that must cross Main since it is a busy thoroughfare. There will be no way for them to avoid having the children cross Stower. This City does not bus the majority of the school children.
- The issue remains of how the children (and even vehicles) are supposed to cross Stower. The EA addresses going up and down Stower as being safer, but doesn't really consider the side street traffic. With Highland Park School and the usage of Cale and Earling for dropping off children, the "crossing" of traffic is a significant issue.
- A change in traffic flow on Haynes should be anticipated if Stower is put through because the timing on the light at Stower will have to be adjusted to allow for more traffic traveling east/west. This would be anticipated to back up traffic, at a minimum, as far as Comstock (which is currently the "best" route into Michael's--being a paved road). It should not be anticipated that all traffic will go straight into WalMart--significant numbers would probably be turning to go to fast food places. There may also be difficulty for traffic seeking to turn left off of Haynes (or back onto Haynes after having been at a restaurant, etc.). As previously mentioned, if those people living south of Stower also select Stower as a route to Haynes (since they may not succeed in accessing Haynes from their "normal" streets), a number of them could be anticipated to drive past Highland Park on Cale or Earling to access Stower (since it would be unlikely that they would backtrack to Strevell for access).
- The demographics of the drivers should be looked at. Currently, Miles City does have a relatively high proportion of seniors (many ranchers "move to town" in their later years). Many of these people use Stower to access downtown during "off traffic" hours--and many travel at a slower rate of speed. Add into the mix on Stower higher traffic at all times, as well as faster traffic due to high school students and out-of-towners, and you have the makings of some real safety issues.
- For people using Stower to access the VA or MCC (as indicated in the EA), there will be a left turn required if they are coming from town. With a higher rate of traffic, this may be difficult. These people seeking these destinations may find that a right turn off of Main provides easier access; however, this is shifting the traffic back to Main which was supposed to be removed.
- There is no school directly on Main. The high school sits just off of Main in the underpass area. The high school students, in fact, are one of the problems with traffic in that area since a

## Response

21. Thank you for your comments. See response to Comment #1 regarding the selection of the No-Build Alternative for Stower Street.

21

## Comment #42 cont.

high proportion of them now drive vehicles. Comment letters discussed the difficulties of grade school children crossing Main. I would anticipate the problems would be even greater by Highland Park since the school would be directly located on this main thoroughfare.

- The High School is located in the same vicinity as Lincoln School (which already has major traffic problems, in part due to these high school students). If more high school students travel to access Stower, several issues arise. They will be traveling on narrower side streets, including crossing unregulated intersections. They will, in all probability, have difficulty accessing Stower since it will be a left turn to go to Haynes and the fast food places (currently a right turn onto Main). Inexperienced drivers sometimes "push the limits" when entering traffic and one should anticipate a higher rate of accidents due to this. In addition, a larger number of high school students seeking to access Stower may result in a larger amount of traffic by Lincoln School--an area that is already "troubled."
- The "other" portion of Stower is truly an urban route that services a large number of southside locals headed to the downtown area to work (where most of the professional offices and much of the retail currently is). Leighton currently handles some of the northsiders (although some of these also use Main). Main is the "route of choice" for out-of-towners, as well as some locals that are closer to that vicinity. This pattern serves to disperse the traffic between routes, thus resulting in lower overall ADTs for any given road.
- Main is often difficult to access from the north/south routes (since it is a through street with no controlled intersections until the underpass). Adding Stower into the mix as a "difficult to access street" will make north/south transport more difficult. This may have the effect of diverting some of the traffic "back" to use the crossing at 4th (resulting in higher traffic for these areas--some of which have significant safety issues of their own due to the "cock-eyed" streets). These are precisely the streets that thought the Stower project would relieve their traffic burden.

21  
cont.

## Perspective

I have not covered the issues in the depth I would like (inadequate time and space) and I have focused on the "factual" issues related to the project. Perhaps a little perspective is in order before closing. There are three main motivators in our society--power, money, and love. I would like to introduce you to a few of the people impacted and fighting to keep the neighborhood from being destroyed. These are the people fighting for love of a neighborhood and love of a way of life. This is not much different than the perspective we all gained when personal information was provided in the days after the September 11 tragedy.

- Meet Billie and Short. Both are retired and had significant health problems. Yet, they attended the public meeting on February 28, 2002 in bitter cold and a blizzard. Billie is on oxygen and had to wear her little knit cap to protect her scalp as she was recovering from recent brain tumor surgery. They wrote letters. Short had the last word to say at that meeting, "If it ain't broke, don't fix it." Billie is still writing letters. Short passed away recently and we all miss him. It seems only proper tribute to him to include his comment in my letter.
- Meet Betty. She was a quiet woman. English was a second language and she was not always comfortable with what she perceived to be difficulties in communication. She loved her yard,

22

## Response

21. Response provided on the previous page.

22. Response provided on the next page.

## Comment #42 cont.

most particularly the two trees her late husband had planted. I encouraged her to believe that this was truly a country where we had the right to speak and our opinions would be heard. She gathered her courage (I suspect at great cost to herself) and spoke out at the February 28 meeting. She sent in a letter. She, too, passed away, not ever knowing whether this democratic system would work.

- Meet Stan. He's a quiet and gentle man. He seems most at home spending time with his horses, Bugs and Blue (who are also beloved souls in the neighborhood). He does not live in this neighborhood, but he and his horses are, none-the-less, truly a part of our neighborhood. He has spoken out and written letters on our behalf and defended the lifestyle we cherish.
- Meet Charlee. She is a senior citizen and yet, she has driven 75 miles one direction each time to attend both of the last two public meetings. She would have attended the first as well (October 20, 1988), but was not made aware of it. She cried when she realized she had been deceived by the Glendive District office. She had thanked them at the first public meeting thinking they had been honest. She is a gentle and sensitive soul and deserves more respect and kindness than she has received. She is my mother.
- Meet Bus. He hasn't been able to attend the public meetings due to requirements at the office. At 74, he's still working. He is a hard working man with the values that were once the norm in this part of the country. A handshake means a deal. This is a man who barely missed any work when he severed all of the fingers on his left hand in a lawnmower accident (also drove himself to the hospital). I am proud to say that I am his daughter. He decided what to say and I typed his letters for him because he has difficulty using a typewriter. His penmanship is beautiful, but he felt a typewritten letter would be given more attention.
- Meet Margaret. She lives a couple of houses off Stower. She is retired, but continues to work with the children at the various schools. She has written letters. She was all dressed up to go out the evening I decided to measure the streets, but she came out and helped anyway.
- Meet the children. They wrote heartfelt and meaningful letters against the project. Read them. They show the great insight these young people have. They put up posters to save Stower Street (one is included in my visual survey). They call out greetings cheerfully as they walk or ride past on bicycles. They have come on field trips to observe the birds in my garden. They have helped me weed without any reward other than stories about the plants. They have learned about government in school and have done their best to participate. They are our future. They, too, deserve respect and consideration since they understand the project at a truly personal level.
- Meet Gary. He's new in the neighborhood, yet already a part of the neighborhood. He knocked on my door the other night to ask some questions about what was being proposed so that he would understand. In many places, you never know your neighbors and you certainly wouldn't simply knock on someone's door without an invitation. Not here. We ARE a neighborhood and he was welcome.
- Meet me. I grew up in the very house I live in now. I am a virtual employee (employed by a Wyoming corporation). I do not have to live in Miles City, but I choose to do so. I attended Highland Park as a child. I walk regularly with my little dog, Buster (a senior at 15 1/2), and we frequently chat with the neighbors or other pedestrians. Perhaps that is part of why I am so familiar with the proposed project area. I am, as I said at the public meeting, a CPA licensed in the state of Montana although no longer in public practice, as well as being a former FHWA employee. I am also a veteran (U.S. Army, honorable discharge) and have worked in the past

22  
cont

## Response

22. Thank you for your comments. See response to Comment #1.



## Comment #42 cont.


for the USDA Forest Service, Montana DNRC, and in Criminal Investigation for the U.S. Treasury Department. I fully understand the concept of adequate field work for an accurate end product. This was not done. I have sought help from a multitude of individuals to understand this proposed project. I have done my best to provide at least a portion of what is needed to evaluate the proposed project honestly. I have been a "cheerleader" encouraging others to participate in the process, to believe that what they say makes a difference. I suspect you cannot truly appreciate how difficult this was for them. I feel betrayed. The legal process and protection I believed in has let me down. You have the ability to make it right. The question, of course, is whether you have the integrity and motivation to do so.

22  
work

Last night, my doorbell rang. When I answered there was no one in view. Then, a small child came running out to confess she had left me a May basket. She's six, but she seemed so tiny. I got down on my knees (I'm 5'1") to speak with her eye to eye. We discussed the Stower Street project. She had two questions. The first was, "How do we cross the street and where will the crossing guards be?" There will, of course, be no crossing guards since there is no funding for that position. The second was, "Where will all of the birds and squirrels live?" I had no answers for her. Perhaps you do.

Please let me know if you have any questions or require additional information. I will be happy to provide any assistance I can.

Sincerely,



Karen L. Morris

Enclosure

cc: Senator Max Baucus  
Janice Weingart Brown, DA, FHWA

41-18

## Response

22. See response on previous page.

Comment #43

RECVD MDTGLD APR 22 '03 AM 09:45

RECEIVED

MAY 14 2003

ENVIRONMENTAL

MASTER FILE COPY

#42

April 19, 2003

Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

Dear Sir:

I am strongly in favor of the proposed street access on Stower. It is important for the Miles City community to show support for a project that is practical.

The local paper indicates that several of the individuals affected on this route are in opposition. People always oppose change. However, it is imperative that another route from downtown is improved. People zigzag through many side streets in order to get through to the main shopping center in Miles City. The situation will only get worse.

Please consider the majority of the population who favor access. A few people who do not want more traffic by their homes should not stop reasonable access for thousands.

Thank you.

Sincerely,

*Kena Niles*

Response

Thank you for your comment. See response to Comment #1

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgr		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MG		
		MAINTENANCE CHIEF - WP		
		Mile Supr G.M.W.		
		Shop Supv G.M.W.		
		Sectionmen G.M.W.		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Agent		
		Traffic Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		District File		
		Bulletin Board		

**Comment #44**

REC'D MDTGLD APR 18 '03 AM 09:43

Cyndi Raymond  
977 S. Center  
Miles City

**RECEIVED**  
MAY 14 2003  
**ENVIRONMENTAL**

MASTER FILE  
COPY

April 17, 2003

Bill McChesney  
Montana DOT  
PO Box 890  
Glendive, MT 59330-0890

23

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GPV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Mike Supv G.M.W		
		Shop Supv G.M.W		
		Sectionmen G.M.W		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Agent		
		Trngng Engr		
		Right of Way		
		DIST ADMINISTRATIVE OFFICER		
		PERSONNEL SPECIALIST		
		District File		
		Bulletin Board		

Dear Bill,

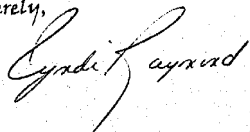
Thanks for your comments in the 4/16/03 Miles City Star. I would just like to reiterate my unqualified support for the three urban street projects proposed for Miles City.

As a citizen who lives on one of the few "through" streets in Miles City (we live on the corner of Center and Tompy), I can honestly say that we see little, if any, negative impact; and quite honestly, there is a big plus in that Tompy is always one of the first streets to be plowed free of snow & sanded nicely!

Seriously, I believe that we citizens need to look beyond our own immediate comfort zones, and see the potential and immediate benefits to our greater community if these three street projects are implemented. Growth always means changes to the traffic flow, and we need to be ahead of the game in our planning. We have a great opportunity here to take advantage of the outside funding, and I believe we should certainly use it.

Thanks for your hard work and positive attitude!

Sincerely,



**Response**

Thank you for your comments.

# Comment #45

## ENVIRONMENTAL MONTANA DEPARTMENT OF TRANSPORTATION

### Comment Form

Project: Miles City Urban EA Hearing *SPDWER* *# 44*  
 Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
 Control Number: 4361, 4362, 4363  
*WILSON* *SRHILL* *SPDWER* *SRHILL*

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 25, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Jack Regan, Superintendent  
Miles City Unified School District  
1604 Main Street  
Miles City, MT 59301

COMMENTS: \_\_\_\_\_  
 \_\_\_\_\_  
 Please see attached comment sheet

#### Comments:

On behalf of the Miles City School District I would like to make the following comments concerning the improvement of Stower Street.

The School District's position on this would be we don't like high traffic around our schools. We feel that by changing Stower to a through street from Haynes Avenue to Strevell will significantly lessen the traffic on Comstock.

Presently, most of our children are dropped off on the corner of Comstock and Earling and Comstock and Cale streets. The end of the school block, which is completely fenced, is not where children are dropped off to enter school so from that perspective we feel it would be a good thing to move the traffic to Stower and relieve the congestion on Comstock.

Our main concern is that Stower would never turn into a truck route. I've heard rumors and if we have assurances that Stower will never be a truck route, then we have no objections. Also, we would like to see flashing lights indicating that you are going into a school zone and we would like those at least one half block before Earling and one half block before Cale on Stower. As indicated in your plans we think the neckouts on the corners of Cale and Stower and Earling and Stower would be a great thing. We feel it would help slow traffic and give pedestrians and our children a way to look out and see traffic approaching. That would be an outstanding feature in the project. I would hope Earling and Cale and the other streets leading into Stower will be stop streets because I think that will help slow traffic and be safer for our children.

We have no problem taking out the sidewalks and widening the streets. Any trees or shrubs that are there, we would like to get rid of so that would be a plus for us. The addition of new sidewalk would be good as the existing sidewalks need repair.

If it is done correctly and we get more input the closer you get to construction time and we could go over this one more time with the Department of Transportation I would appreciate it. You have been more than helpful and I'm sure it will continue. The School District feels it is a better option of having the traffic on the northern end of our block where the kids and traffic are not as congested than it is to have the traffic on Comstock where it presently exists.

I also feel that when Wilson Street is made into a complete street with curbs, gutters, and sidewalks even more traffic will be diverted away from Comstock and Stower as people will use that street for crossing over from Strevell to Haynes and also for getting to the hospital instead of the streets they presently use.

# Response

1. Additional information on traffic projections and circulation was provided by MDT subsequent to the public hearing and is described in Section 4, Clarifications to the Environmental Assessment.
2. Comments noted.
3. MDT appreciates the School District's offer for additional coordination on the Build Alternative for Stower Street. However, MDT and FHWA have selected the No Build Alternative for Stower Street. See response to Comment #1

**Comment #46**

**Response**

**RECEIVED**

MAY 14 2003

**ENVIRONMENTAL**

REC'D MDTGLD APR 21 '03 AM 07:12

**MASTER FILE COPY**

**MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form**

Project: **Miles City Urban EA Hearing**  
Project Number: **STPU 8013(1), STPU 8006(1), STPU 8009(2)**  
Control Number: **4361,4362,4363**

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Lynn Robinson  
12 W. Strevell Ave.  
Miles City, Mt. 59301

COMMENTS: I strongly believe the Stover Street project should be done so that the increasing traffic in Miles City can be more evenly dispersed through the town.

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Erg Prod Mgrs		
		Erg Officer		
		MAINTENANCE CHIEF - RDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - V/P		
		Supv - Supt. G.M.W.		
		Supv - Supt. G.M.W.		
		Supv - Supt. G.M.W.		

Thank you for your comments.



Comment #48

Response

REC'D MDTGLD APR 24 '03 AM 09:59

MAILED FILE COPY

MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

RECEIVED

MAY 14 2003

ENVIRONMENTAL

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

NO.	NAME	MAIL ROUTE	COPY	INT
	DISTRICT ADMINISTRATOR			
	CONSTRUCTION ENGR			
	ASST CONSTRUCTION ENGR			
	MAINTENANCE CHIEF - GOV			
	MAINTENANCE CHIEF - NC			
	MAINTENANCE CHIEF - WP			
	Asst Supv G.M.W.			
	Shop Supv G.M.W.			
	Asst Supv G.M.W.			
	ENGINEERING SERVICES ENGR			
	Asst Supv			
	Materials Supv			
	Traffic Engr			
	Right of Way			
	PERSONNEL SERVICES ENGR			
	PERSONNEL SPECIALIST			
	District File			
	MAIL ROOM			

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59380-0890 by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. We will use your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: JOHN + PAULA SCHEUERING  
3523 BATCHELOR  
MILES CITY MT 59301

COMMENTS: WE FEEL THAT THE STOWER PROJECT WILL NEGATIVELY AFFECT THE MICHEL'S ADDITION BY INCREASING TRAFFIC AND SPEEDS IN OUR AREA.  
IN FACT, I CAN THINK OF NO ONE THAT THIS PROJECT BENEFITS EXCEPT WAL-MART.  
I FAIL TO SEE WHY A MULTI-NATIONAL CORPORATION THAT MAKES FEW, IF ANY, CONTRIBUTIONS TO OUR COMMUNITY, SHOULD GET THIS PERK.  
WHY THEN, IS A PROJECT COSTING NEARLY A MILLION DOLLARS BE PAID FOR BY TAXPAYERS. IF WAL-MART WANTS THIS PROJECT, THEY COULD EASILY PAY FOR IT THEMSELVES.

Thank you for your comment. See response to Comment #1

Comment #49

Response

ENVIRONMENTAL

MONTANA DEPARTMENT OF TRANSPORTATION  
Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 5, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Verna + Kathy Schupp  
914 S Custer  
Miles City, MT 59301

COMMENTS: As residents of Miles City for more than 30 years, we are pleased with the proposals for Wilson, Stover, and Strevell Street improvements.  
We feel that Wilson and Strevell are too narrow in these areas. Wilson has had increased traffic with the medical complex move + MUST be widened. Strevell poses hazards for people parking along that street - even people backing out of driveways cross both lanes when they come onto the street. It will be great to have it the same width all the way down. We are pleased that Stover is included to be completed. We never thought there would be access available through Foster's land. We feel it will more evenly divide the traffic east to west to + from Haynes avenue. Our experience when our children were at Highland Park School was that people traveled more sensibly on the through streets than they did on Cale or Earling

Thank you for your comment. One of the needs the proposed projects would meet is "Improving Safety" as described in Chapter 1 of the Environmental Assessment.



## Comment #50

### ENVIRONMENTAL

April 22, 2003

Bill McChesney  
Montana Department of Transportation  
PO Box 890  
Glendive, MT 59330-0890

Mr. McChesney,

I am writing in support of the Stower Project.

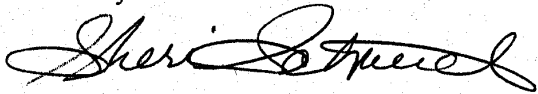
I feel that if Stower Street was made a through street it would cut down the traffic that goes by the used entrance to Highland Park School which is Comstock Street and would make it safer for the children as Stower Street is next to the fenced in area.

I also feel if completed it would completely cut out the traffic that the college kids have to contend with when trying to go from their dorms to their classrooms. Again making it safer.

I know that it is a change, but would give a good access to Haynes Avenue where the newer development is progressing.

I am sure it would be helpful for people living in Michels Addition and Southgate to access the downtown area.

Sincerely



## Response

Thank you for your comment.

See response to Comment #1.

**Comment #51**

**RECEIVED**

MAY 14 2003

**ENVIRONMENTAL**

April 21, 2003

#50  
**MASTER FILE  
COPY**

I am a concerned citizen. I read in the paper about the street project on Stower. When is this town ever going to move forward with some development? How can we have development if you let a few resistant neighbors stop a big project that makes complete sense?

We just had a terrible accident and a little boy lost his life on the busy street by Highland Park school. That is because the only way to get to shopping is that one darn street. It makes way better sense to put a street through where the kids are not all together. The Stower street is on the other side of the school.

For once do something that plans for the future. Put the street through on Stower and make Miles City look like we have some sense.

L. M. Spear

**Response**

Thank you for your comment.

See Response to Comment #1.

Comment #52

Response

Thank you for your comments. See response to Comment #1

REC'D HD TGLD APR 23 '03 AM 09:45

RECEIVED

April 21, 2003

MAY 14 2003

Mc Chesney

Re: Stowers project in our

ENVIRONMENTAL

MASTER FILE

FILE	MAIL	EXLITE	CONTRACT ADMINISTRATION	CONSTRUCTION	ENGR	ENR OFFICER	MAINTENANCE CHIEF - GDV	MAINTENANCE CHIEF - MC	MAINTENANCE CHIEF - WP	MRS. SUPV. G.M.V	SHOP SUPV. G.M.V	STATIONMASTER G.M.V	ENGINEERING SERVICES ENGR	Design Supv	Materials Supv	Utility Supv	Traffic Engr	Asst. Dir. of Hwy	ASST ADMINISTRATIVE OFFICER	PERSONNEL SPECIAMS	District File	Bulkhead Board
------	------	--------	-------------------------	--------------	------	-------------	-------------------------	------------------------	------------------------	------------------	------------------	---------------------	---------------------------	-------------	----------------	--------------	--------------	-------------------	-----------------------------	--------------------	---------------	----------------

As I've been justifying and reading about this project to Haynes, I know that both (he and I) have been at their location for 40 yrs. And now we're looking at an upheaval of all this - the residents, school, + church. You call it progress, I don't. Oh, the powers for all the H's!!

Shouldn't it be sensible to respect a House of Worship + the school children?

I don't know if you attend a church, but for the past 40 yrs. I have been there for worship Sundays and now, a decent environment we've been blessed with will be gone. Especially older people with hearing problems will now hear the roar of this traffic every Sunday. They won't hear the pastor, choir, etc.

Another factor which should have been considered is that church members donate a tree or shrub in memory of their loved ones but apparently not

Comment #52 cont.

Response

See response on previous page.

MASTER FILE  
11 Y

the City Council or you <sup>and</sup> care about  
that as you demolish everything from  
Stowell to Hayes.

When you parked at intersection  
Stower and Call, you should have  
been behind our church parked at  
the Earling & Stower intersection, as  
that's where I see school children  
walking home on Earling because  
not all H.P.S. kids live south or  
East or West of H.P.S. Many do go  
north; so I didn't feel that was  
authentic. I know Karen Morris,  
at your meetings has given you  
negatives about this and it's been  
ignored so these children have no  
choice, but to try to muddle across  
Busy, Busy, Stower Stower.

These plans are not more important  
than a child's life. It seems to me  
that there should <sup>have</sup> been a broad dis-  
cussion of negatives as well as positives.

I've noticed new people who have just  
bought a home on East Stower will use  
the new lovely little evergreens &  
shrubs they've planted. It seems  
like people of this project ignore it

Comment #52 cont.

Response

See response on previous page.

- 2 -

For the extra \$, I don't think  
that's progress when you ignore the  
House of Worship & small children  
(H.P.S.) that grades K - 4th

Also residents are worried about  
the value of their homes after all the  
existing things are swept away.

Personally, I've never had a prob-  
lem finding Main Street and I travel  
it often. After all, the P.O. & the  
Banks are downtown. There's no  
problem since the stop signs  
were taken away at the Stevell  
& Main intersection and I get there  
quickly.

Sincerely,  
Leo Swenson  
M.C.  
(My Comments)  
on the Project

Comment #53

RECEIVED  
MAY 14 2003  
ENVIRONMENTAL

John C. Taylor  
32 Balsam Drive  
Miles City, MT 59301

406-232-5955

MASTER FILE  
COPY

RECEIVED

MAY 25 2003

Dept. of Transportation  
Miles City, Montana

\*52

April 23, 2003

Montana Department of Transportation  
c/o Bill McChesney  
PO Box 460  
Miles City, MT 59301

Dear Mr. <sup>Bill</sup> McChesney,

I am writing this letter in support of the three street revision projects currently under evaluation here in Miles City, MT—So. Strevell, Wilson Street, and the Stower Street extension.

All three projects are meaningful to Miles City, but it appears that the So. Strevell and Wilson Street ones have less initial controversy than the Stower project. I feel that all or nearly all major concerns have been or can be successfully mitigated by your staff, which to date, has done an excellent job of planning.

Progress (which frequently requires change) is often negatively viewed by some people, but sometimes a few folks may be shortly inconvenienced for the long term benefit of many—as well as themselves. Enough philosophical rhetoric—you folks have been doing a great job here in Miles City that I'm sure will continue for a long time to come. Keep up the good work.

Yours truly,

*John C. Taylor*  
John C. Taylor

Response

Thank you for your comments.

Comment #54

Response

MONTANA DEPARTMENT OF TRANSPORTATION  
**Comment Form**

RECEIVED  
 MAY 14 2003

Project: Miles City Urban EA #53  
 Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
 Control Number: 4361, 4362, 4363

PLANNING	DESIGN	CONSTRUCTION	OPERATIONS	SALES	MARKETING	TRAINING	RESEARCH	INFORMATION	LEGAL	FINANCE	ADMINISTRATION	PERSONNEL	COMMUNITY RELATIONS	ENVIRONMENTAL	PLANNING	DESIGN	CONSTRUCTION	OPERATIONS	SALES	MARKETING	TRAINING	RESEARCH	INFORMATION	LEGAL	FINANCE	ADMINISTRATION	PERSONNEL	COMMUNITY RELATIONS	ENVIRONMENTAL
----------	--------	--------------	------------	-------	-----------	----------	----------	-------------	-------	---------	----------------	-----------	---------------------	---------------	----------	--------	--------------	------------	-------	-----------	----------	----------	-------------	-------	---------	----------------	-----------	---------------------	---------------

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: HAROLD VOSEN  
614 South Montana Avenue  
Miles City, MT 59301  
home-owner and driver who uses Stover St to get to Haynes Ave

COMMENTS: Dear Mr. McChesney - I agree with the urban street proposals and priorities with one exception. I would like to see the new roadway on Stover be given the highest priority before you tear up the other parts of Stover, Strevell and Wilson. According to the April 16 issue of the Miles City Star, the improvements to Stover would draw a lot of Main Street traffic to South Haynes Avenue and alleviate some of the main street traffic. I disagree with that. I believe that Main Street traffic will be constant. What will change is the reduction of traffic on Comstock past Highland Park School and somewhat on Tompy. When stop signs were put along Comstock, the traffic from 8th Street to South Montana to Comstock increased 400% from when we moved in (1981). Some of them use Tompy to get to South Strevell and Wilson.

1. Since the public hearing, MDT conducted additional traffic volume and projection analysis for the streets in the vicinity of the proposed projects, such as Comstock and Main Streets. This analysis is described in Section 4, Clarifications to the Environmental Assessment.

Comment #54 cont.

Harold C Vosen  
614 South Montana Avenue  
Miles City, MT 59301

Page 2

NO one likes to see traffic increase through their neighborhood. The Kelleys <sup>already</sup> have a lot of traffic on Stovell. I believe the project on Stower makes sense for the community - even though some Siberian Elms and some trashy Honey-Locust have to go. At least we will have more sidewalks. I for one am tired of walking in the street and I feel guilty having to walk on lawns when there is traffic even though it is city property.

I suggest a stop sign be placed at Cale and Stower - a 4-way - just like at Stovell and Comstock and Stovell and Stower. That intersection is supposed to be 15 mph because of the school zone, but many drive faster than that. My neighbor got blindsided by a girl going south on Cale at 35-40 mph.

Since I grocery shop at least twice a week at Albertsons and County Market, I usually take Stower to the one way alley (Sewell) or go north on Cale to Dickinson and then go by the College to Albertsons. With all the traffic and manholes and dips - Comstock is such a rough road.

Until Stower is widened, why not consider putting "NO PARKING" signs on the north side of Stower? Most people don't anyway, but if cars are parked on both sides of the street, traffic gets pretty congested, and sometimes quite hazardous.

Finally - since almost no one parks on Wilson anyway, why not have sidewalks as Sandra Anderson suggested? Remember - Make Stower a "Through Street!" (Good Luck!)

Response

2. The City is considering installing stop signs to deter speeding traffic along Stower. This activity is outside the scope of the MDT proposed projects.
3. Thank you for your suggestion. We have forwarded it to the City.
4. The conceptual design of the Build Alternative for the Wilson Street proposed project originally included sidewalks on both sides of the street, but was subsequently revised to the south side after working with adjacent property owners.



Comment #55

RECEIVED

MAY 14 2003

ENVIRONMENTAL

April 22, 2003

Bill McChesney  
Montan Department of Transportation  
PO Box 890  
Glendive, MT 59330-0890

Mr. McChesney,

I am writing in support of the Stower Project.

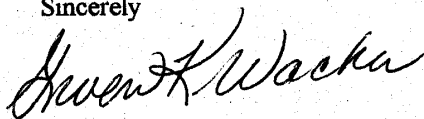
I feel that if Stower Street was made a through street it would cut down the traffic that goes by the used entrance to Highland Park School which is Comstock Street and would make it safer for the children as Stower Street is next to the fenced in area.

I also feel if completed it would completely cut out the traffic that the college kids have to contend with when trying to go from their dorms to their classrooms. Again making it safer.

I know that it is a change, but would give a good access to Haynes Avenue where the newer development is progressing.

I am sure it would be helpful for people living in Michels Addition and Southgate to access the downtown area.

Sincerely



MAST... FILE  
COPY

#54

	ASST CONSTRUCTION E
	Eng Proj Mgrs
	Eng Officer
	MAINTENANCE CHIEF
	MAINTENANCE CHIEF
	MAINTENANCE CHIEF
	Misc Supv G.M.W.
	Shop Supv G.M.W.
	Sanitation G.M.W.
	ENGINEERING SERVICE
	Design Supv
	Materials Supv
	Utility Agent
	Traffic Engr
	Right of Way
	DIST ADMINISTRATIVE
	PERSONNEL SPECIA
	District File
	Bulletin Board

Response

Thank you for your comments.

Comment #56

Response

ENVIRONMENTAL

MONTANA DEPARTMENT OF TRANSPORTATION

Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

WILSON STREVELL STOWER

STP STP STP

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: This is coming from Miles Community College, Jan Wagner, President, at 2715 Dickinson, Miles City, MT 59301.

(Board of Trustees)

COMMENTS: 1st - Miles Community College is writing its support of the development of the Miles City Urban EA Project for Wilson, Strevell, and Stower Streets. The development of Stower Street would have the greatest impact on Miles Community College by providing vehicle traffic to the College directly from Haynes Avenue and channeling that traffic into the front portion of the college campus. Second, the development of Stower Street would also enable the college to close the eastern section of Dickinson Street providing much enhanced safety to students from the dormitory to the campus area. Third, Stower would help diversify traffic patterns from the college after major sporting events, conferences, and/or normal class periods. Fourth, it would be for the betterment of the community and the distribution of traffic from Haynes Avenue to and from downtown Miles City.

Thank you for the opportunity to express our opinion and look forward to the completion and development of the Urban EA Project.

Thank you for your comment.

Comment #57

MAY 14 2003

IRONMENTAL

April 20, 2003

Mr. Bill McChesney  
Montana Department of Transportation  
P. O. Box 890  
Glendive, Montana 59330-0890

	MAINTENANCE CHIEF - WF	
	Misc Supv G M W	
	Shop Supv G M W	
	Sectionmen G M W	
	ENGINEERING SERVICES ENGR	
	Design Supv	
	Materials Supv	
	Utility Agent	
	Traffic Engr	
	Right of Way	
	DIST ADMINISTRATIVE OFFICER	
	PERSONNEL SPECIALIST	
	District File	
	Bulletin Board	

Dear Mr. McChesney:

The Stower Project is sensible and desperately needed in this community. It not only makes good sense but also is a must to relieve the congestion in front of Miles Community College.

My family lives on Dickinson Avenue. I have watched with horror as the cars race down this street, past MCC, whip around the apartment house, and travel on to Wal-Mart or the grocery stores. Dickinson is narrow and has not been developed the way the proposal for Stower will be.

Please consider this support for the Stower Project. We need development in this town. It may be inconvenient for those few people who do not want traffic by their homes but the majority of citizens need good access to Haynes Avenue.

A concerned citizen,

Julie Wambolt

Response

Thank you for your comment.

# Comment #58

4/17/03

#51

ORIGINAL COPY

APR 2003  
CENTRAL

Bill McChesney  
Montana Department of Transportation  
P.O. Box 890  
Glendive, MT 59330-0890

Dear Bill,

I am writing in support of developing Stower Street as a through street in Miles City. I believe that another east to west route through Miles City is advisable. Currently many people use Dickinson St. as a thoroughfare and its suitability is highly questionable.

If Stower were developed I think it would help move traffic around the town more safely and efficiently. Although Highland Park School does border Stower, I suspect that its development could make the traffic near the school safer. The current situation of Comstock carrying traffic past the school as well as all the uncontrolled intersections adjacent to Stower is much less desirable. Before the 4 way stop on Main and Strevell was changed, many people felt it would create a highly dangerous situation; in fact, I believe it has improved the safety and traffic flow across town.

Additionally, it seems that both Main Street and Haynes Avenue businesses would benefit from moving traffic efficiently back and forth across town.

Although I am sure the homeowners bordering Stower Street feel this development would have a negative impact on their property value and quality of neighborhood, it is important to realize that a project considered to be beneficial city-wide should not be rejected on that basis alone.

Sincerely,

Karen Weeding  
3813 Comstock  
Miles City, MT 59301

ACT	RTE	MAIL ROUTE	COPY	INT
		DISTRICT ADMINISTRATOR		
		CONSTRUCTION ENGR		
		ASST CONSTRUCTION ENGR		
		Eng Proj Mgrs		
		Eng Officer		
		MAINTENANCE CHIEF - GDV		
		MAINTENANCE CHIEF - MC		
		MAINTENANCE CHIEF - WP		
		Miles Supv G M W		
		Shop Supv G M W		
		Sectionmen G M W		
		ENGINEERING SERVICES ENGR		
		Design Supv		
		Materials Supv		
		Utility Agent		
		Traffic Engr		
		Right of Way		
		Chief ADMINISTRATIVE OFFICER		

## Comment #59

~~ITAL ENVIRONMENTAL~~  
**MONTANA DEPARTMENT OF TRANSPORTATION**  
**Comment Form**

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to **Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.**

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: Loretta Wright  
23 Balsam Drive, Miles City, MT 59301  
(Corner of Balsam & Strevell)

COMMENTS: As a homeowner on the Strevell  
project I am relaying my support  
to the project on Strevell and Wilson  
project.  
Having the improvements made to the  
east side of Strevell has tremendously  
less impact to the homeowners on  
Strevell. Due to this street having  
homeowners on only one side of the  
street it will not affect current  
sprinkler systems, curb sides, existing  
landscaping, cable wiring, fire hydrants,  
street lighting, utilities, and any other existing  
underground wiring.  
I support improvements to improve the  
city of miles city.

## Response

Thank you for your comment. The City and MDT have been working with adjacent property owners to preserve trees and minimize impacts of the proposed projects where possible. Through working with local residents, the conceptual designs of the Strevell and Wilson proposed projects were revised to include sidewalks on one side of the street only.

## Comment #60

## Response

Thank you for your comment.

ENVIRONMENTAL  
MONTANA DEPARTMENT OF TRANSPORTATION  
SOFT

### Comment Form

Project: Miles City Urban EA Hearing  
Project Number: STPU 8013(1), STPU 8006(1), STPU 8009(2)  
Control Number: 4361,4362,4363

You are invited to make your comments on this form and leave it with the meeting officials or take it with you and mail it to Bill McChesney, Montana Department of Transportation, PO Box 890, Glendive, MT 59330-0890, by May 15, 2003.

Please indicate your name, address and affiliation (if any) below. Thank you for your interest and comments on this project. Feel free to use the back and/or additional sheets of paper if necessary.

NAME AND ADDRESS: MICHAEL T. WRIGHT  
23 BALSAM DRIVE  
MILES CITY, MONTANA 59301-4945

COMMENTS: I AM IN TOTAL SUPPORT TO THE UPGRADES  
OF THE ROAD (STREET) PROJECTS LISTED ABOVE. THE  
ENHANCEMENTS WILL PROVIDE ADA COMPLIANCE, SAFETY  
FOR ALL CITIZENS, WALKING AND MOTORIZED AND A  
MUCH NEEDED "FACE LIFT" FOR THE STREETS AND  
BOULEVARDS FOR THIS COMMUNITY. FOR MANY YEARS  
THERE HAS BEEN NUMEROUS ACCIDENTS AND PROPERTY  
DAMAGE ON STEWELL AND BALSAM DUE TO THE POOR  
CONDITIONS OF THE ROADWAY. THIS MAY BE MINIMIZED  
WITH THE ENHANCEMENTS AND PROVIDE ADDED SAFETY  
FOR PEDESTRIANS TO SCHOOLS, NURSING HOMES AND  
MEDICAL FACILITIES. PLEASE DO NOT LET THE COMMENTS  
FROM THE "ALWAYS" NEGATIVE, OUTSPOKEN, FEW INDIVIDUALS  
DETER THE MDT AND CITY OF MILES CITY FROM COMPLETING  
THESE MUCH NEEDED PUBLIC ROAD PROJECTS.

Thank you!

## **Appendix B:**

Other Correspondence Received during the Public Comment Period  
and Responses

## Email from K. Morris, 4/16/03

**From:** "Karen L. Morris" <busterm@midrivers.com>  
**To:** <kdk@deainc.com>  
**Date:** Wed, Apr 16, 2003 4:48 AM  
**Subject:** Additional Information

Hi Kristin,

I appreciated having the opportunity to talk to you last night. Some additional information as to the reason for the concern of citizens regarding the trucks may be in order (not included in the summary provided to you because of the level of awareness for the locals). Please forgive me if I am repeating information you already have, but I felt it was important just in case you were not aware of the situation.

There are currently two bridge replacement projects being planned for the Tongue River. The Pacific Avenue Bridge is an older bridge that is not used much now due to its size and condition. Replacement of this bridge will occur first and traffic (including trucks) will be routed over it while the second bridge (the Main Street Bridge which connects the Interstate exit to Main) which is now the main bridge is replaced. There have been discussions regarding leaving the Pacific Avenue Bridge as the truck route even after the Main Street Bridge is completed (documented in the article in the Miles City Star on Thursday, March 13, 2003, continuation of Bridges article on page 5).

The Pacific Avenue Bridge connects with Pacific Avenue (as might be anticipated). A review of the map (should a visual inspection of the site not be feasible) shows that, not only does Pacific Avenue intersect with Seventh (Highway 59 to Jordan), but it ends at Eighth Street (documented visually in the photographs I submitted at the Public Meeting last night). Citizens have merely been playing "connect the dots" regarding the implications this situation may provide. As shown with the public involvement on the Stower Project for 5 of 19 years, there may be a valid concern regarding concepts in process that the public is not aware of.

I was unable to attend the Public Meeting for the bridge replacement projects. That meeting fell on the Tuesday (March 11, 2003) after significant snowfall that fell the prior Thursday and Friday. I was "snowed in" and unable to get out of my driveway because the City had not plowed the street (which they did on Wednesday after I called on Monday). This is the storm I reference in my summary for Stower Street. I have relied on information from the newspaper and a conversation with Amorette Allison (Historic Preservation Officer).

Hopefully, this helps fill in another piece of the puzzle. Karen

## Response

Karen's comments and information provided in this email were considered for the revisions made to the Cumulative Impacts Section of the E.A. as noted in the Addendum



## Email from K. Morris, 4/20/03

From: busterm@midrivers.com [hubsmtg.gwhub."busterm@midrivers.com"] on behalf of hubsmtg.gwhub."busterm@midrivers.com"

Sent: Sunday, April 20, 2003 4:27 PM

To: Grenfell, Darrin

Subject: Questions/Clarification STPU 8009(2) Stower Street

Hi Darrin,

Sorry to bother you, but I was trying to reconcile some of the information presented at the Public Meeting and having a bit of difficulty. The EA indicates you can be contacted for information, so I decided that was best since you were in attendance.

Specifically, what started it was the discussion about saving the trees by placing the sidewalk on the other side. I may have misunderstood, but I was under the impression these were the line of trees in the block of Stower between Strevell and Stacy. When I looked at the map in Appendix B, it looked to me like the trees would be removed with the roadway (assuming the trees are the ruffled circles) and it wouldn't save them regardless of where the sidewalk was placed. Could you please clarify this for me?

Then, thinking perhaps I had read that map wrong, I decided to do a rough measurement (based on increased width of the roadway since I don't own a 50 ft tape measure). So, to try to get the correct distances, I looked at Typical Section No. 1 (also Appendix B). I confess that I converted to feet since I am still not trained to think in metric (please forgive this weakness, but there are a lot of us out here that way). I was able to get a handle on the new roadway widths by breaking down the sections and adding them back up to get the total (basically, a total of 44.29 ft including the curb and gutter which total 3.94 feet or 1.97 feet on each side). The existing pavement (which I assume is what Cold Mill Ave. means) came out to 30.97 feet (converted from 9.44 m) excluding the curb and gutter (assumption based on the drawing on the map and the terminology used). If this is correct, the total existing width including curb and gutter is approx. 34.97 feet (using 2 feet each side which is the approximate measurement by my house). Did I figure this out correctly?

Then, I looked at Table 1 (page 13). The existing pavement is shown as 9.4 m (I used 9.44 in my calculation above per the map being two times 4.72). From my calculation, this excludes both the curb and gutter. The proposed total of 42.7 feet (my calculation was actually 42.71 ft) appears to exclude only curb (based on the calculation above). Am I still on track here?

Then, I referred back to page 5 Improving Roadway Deficiencies and it indicates the present paved surfacing width at 26 feet--this is a correct conversion (with rounding) of the 7.92 meters, but does not appear to match the 9.44 meters (30.97 feet) I computed from Typical Section 1 in Appendix B. Even if I subtract 4 feet for curb and gutter (which I don't believe is correct, but I looked at as a possible "oops"), I come up with approximately 27 feet which is greater than the 26 feet. Where does the 26 feet come from? In addition, if MDT design criteria for LOS B is 28 feet, doesn't the street already meet that (being 30.97 feet excluding curb and

gutter)? Could you please clarify these issues?

Then, in hopes of finding an answer, I referred to the work Jon Axline did for the Shore property (Appendix C). In paragraph 1, he indicates that the existing roadway is 34 feet wide. This is relatively close to my computation (particularly if the curb is subtracted off), but disagrees with the widths discussed above in the text of the EA. Was he correct or is the text of the EA (which then means the figure in Appendix B is off)?

Finally, I decided to start at the beginning of the Appendix B figures for Stower and maybe get answers that way (sometimes the beginning is a logical place to go). I was looking at the Design Data box to start with. I could figure out that the 2002 A.D.T. number of 2370 was what was used in the text (although from the "wrong" side of Stower). The 2022 A.D.T. of 3520, however, appears to be the No Build projection (Table 2, page 18). Is that correct (as in what should be used)? I am guessing D.H.V. has something to do with the vehicles per hour for the design--but I don't understand where the 350 comes from. Brief translation? What is T (truck?) at 3%--please elaborate. I assume V is speed (50 km/h translating to the approx. 30 mph used for noise analysis). What exactly is the 80 kN ESAL's equal to 29.68? Thank you for helping me with this translation.

So much for that part of the confusion. Then, this afternoon, it occurred to me that perhaps it was the two trees toward Sewell to be saved. These are very large evergreen trees (bigger than the map shows) and the map doesn't look like they survive either. Where are the trees that will be saved?

Finally, it looks to me (based on the map--which is why I'm directing the question to an expert--and on my computations) that the Construction permit will extend onto the property owners' land (i.e., part is outside of the right-of-way). Is this correct? What sort of damage should be anticipated to the property owners' property from this permit? Would it have been appropriate to mention this to them (rather than just saying that everything was in the existing right of way)?

Thanks so much for your help. Sorry to be such a "ditz," but I really am making my best effort to understand all of this before I draft my real comment letter (which is due by the 5th--and why I would very much appreciate answers soon).

Please let me know if I have muddled up any of these questions (confess to having become a bit confused by the EA's presentation)--I will do my best to explain in order to get answers.

Thanks! Karen

## Reply from MDT to Morris Email dated 4/25/03

**From:** "Mengel, Ray" <rmengel@state.mt.us>  
**To:** "'buster@midrivers.com'" <buster@midrivers.com>  
**Date:** Fri, Apr 25, 2003 1:55 PM  
**Subject:** Questions/Clarification STPU 8009(2) Stower Street

Karen Morris,

I have been requested by Darrin Grenfell to provide a response to your e-mail submitted to Darrin on 4/20/03 at 4:27 pm.

With the current design as approved by the City of Miles City (placement of the new sidewalk adjacent to the new curb & gutter), all of the trees on the north side of Stower Street between Strevell and Stacy Avenue would be impacted and would need to be removed. This also would apply between Cale and Earling Avenue's on the south side of Stower Street.

Between Strevell and Stacy Avenue's, if the trees are exactly parallel with the center of the street on Stower, the new curb & gutter will but up against the existing trees on the north. If the tree line is not exactly parallel, we may need to adjust the location of the final location of the new curb & gutter so as to not impact the trees.

If the final decision is to offset the location of the sidewalk (place the sidewalk north of the trees), there is still enough room to install the new 5' sidewalk. The currently owned public R/W by the City is 34-feet from the center of Stower, on both sides. The back of the new curb/gutter will be located at 22.15 feet. This leaves an area of 11.85'. If the trees are 2 to 3 feet in diameter, this would leave an area of 9.85 to 8.85 feet behind the trees to locate the new 5' sidewalk.

You are correct that new width will be 44.29-feet from the back of curb to the back of curb. The existing back of curb to back of curb is 35-feet. So, each side of Stower will be widened 4.6-feet from the back of the existing curb to the back of the new curb. As you recall, this is the distance that I measured out for you at your property over a year ago.

For clarification, part of the 9.5 foot parking lane is included in a portion of the new curb and gutter. The new curb & gutter is 2-feet wide, with 9 1/2" of this area being included in the 9.5-foot parking lane (this is the gutter pan area).

You mention in your e-mail, that by your calculation "the proposed total of 42.7-feet appears to exclude only curb". I'm not sure what you are referring to in this statement. Again, the new width will be 44.29-feet (13.5 meters) from back of curb to back of curb.

Your e-mail referred to page 5 (Improving Roadway Deficiencies) "and it indicates the present paved surface width at 26-feet". This section in the EA is presented as a composite for the width of the three (3) street projects and is not project specific. Its a general comment that relates to all 3 projects. For project specific you need to use the Table and the Typical Sections that are included in the EA.

You are correct that the current street width of 28-feet does meet MDT design criteria for LOS B, but the current width does not meet MDT standards for providing necessary driving lane and parking lane widths.

In your reference to Jon Axline's statement for the Shore property, I'm not sure if John measured to the bottom of the gutter pan or what he measured to. The existing width in this area is 35-feet from back of curb to back of curb. You then would need to minus out for that portion of the existing curb that doesn't allow for parking and that might have been what Jon has done.

You are correct that the ADT of 3520 if for the No Build projection. D.H.V. is the design hourly volume of traffic. This number means that at some peak hour during a 24 hour period, this would be the highest number of vehicles on the street, under the No Build. For this project, the highest number of vehicles would be 350.

T refers to the total percentage of trucks out of the total ADT that may use the route. In this case this number is 3%. Please keep in mind, this includes all truck types. They maybe stock trucks, delivery trucks, etc. or any vehicle that is classified as a truck.

The 80 kn ESAL's refers to total number of axle loads that would be using the route under the 2022 ADT traffic year. This information only has to do with weight. We use this information to determine what depth our new surfacing should be to handle traffic loads.

You are correct that the 2 trees near the intersection of Sewell and Stower (on the north side) will be impacted no matter where the new sidewalk is located. The trees that can be saved are located between Strevell and Stacy on the north side and between Cale and Earling on this south side.

For the majority of the project, there will be no need for construction permits. There will be isolated locations where a permit will be necessary. The purpose of this permit would be to install forms for sidewalk. If any area is disturbed by our contractor outside of the Miles City public R/W, we will require the contractor to reclaim this area. We did mention this at the public meetings.

I trust that all of this is helpful, if you have further questions in regard to project specific items, feel free to call me toll free at 1-888-689-5296.

**CC:** Grenfell, Darrin; bmcchesney@state.mt.us;Kdk@deainc.com, jgoettle@state.mt.us

## Email from K. Morris, 5/15/03

**From:** "Karen L. Morris" <busterm@midrivers.com>  
**To:** <jriley@state.mt.us>  
**Date:** Thu, May 15, 2003 10:36 AM  
**Subject:** STPU 8009(2) Stower Street Miles City

Dear Ms. Riley,

In today's mail, I received a copy of Ray Mengel's April 25, 2003 response to my E-mail to Darrin Grenfell of FHWA (April 20, 2003). Unfortunately, the sender provided no identifying information other than it came from MDT Environmental Services per the envelope. I am assuming that you either sent or are aware of this copy being sent to me. Mr. Grenfell also provided a copy to me via E-mail on May 12, 2003.

I did not receive the original E-mail response since it was sent to the wrong address (the "m" being omitted at the end of buster). I would like to thank the current sender from MDT and Mr. Grenfell (again) for sending copies of the response. Unfortunately, these copies arrived after the deadline for comments on the project and some additional questions/comments/issues were raised by the response. As examples, I remeasured from the curb again and it still appears to me that the roadway, itself (not the sidewalk), will be responsible for severing the trunks of the trees that Mr. Mengel indicates will be saved (which concurs with the presentation in Appendix B). Also, Mr. Mengel mentions stock trucks (the term normally used for cattle trucks) using Stower--the truck issue, as indicated in my 18 page comment letter, being a real concern (with cattle trucks posing even more issues than other trucks).

I can only hope that MDT and the consultant will take the time to obtain accurate data for the analysis and then examine all of the issues in greater depth to provide an accurate assessment of the impacts this time. I remain willing to provide any additional observations which may be of help to you in achieving this end.

Karen

**CC:** "Falcon, Kim (Baucus)" <Kim\_Falcon@baucus.senate.gov>, <Kdk@deainc.com>, "Grenfell, Darrin" <Darrin.Grenfell@fhwa.dot.gov>

## MDT Response

We appreciate your concern regarding the use of heavy trucks using Stower Street, should the proposed Stower Street project be implemented. We have addressed this concern in the Response to Comments and the Addendum.

Freight truck traffic will be deterred from using Stower Street through the posting of vehicle weight limits. This ordinance would be enforced by the City.

The details of the design of the exact street footprint would be determined in later phases, should the proposed project proceed beyond conceptual engineering. During detailed design, trees that are found to be in the envelope of the City-owned right of way and in the envelope of the roadway, curb and gutter would likely be affected. MDT and the City would work with adjacent property owners to determine mitigation for trees and landscaping outside of the roadway envelope.

## Visual Survey provided by Karen Morris

### VISUAL SURVEY OF PROPOSED PROJECT AND ENVIRONS STPU 8009(2) STOWER STREET, MILES CITY

Prepared by Karen L. Morris

*Provided on April 15, 2003 4:45 MDT*

FIGURE(S)	COMMENTS
1-3	Views of front of Highland Park School, 716 S. Cale (per telephone book). Note double doors, school bus signs, designated handicapped parking sign, flagpole, and lettering on building--all clues that this is a probable entry for children. Per a telephone conversation with Highland Park School, 04-11-03, this is the designated entrance for 18 kindergarteners for the morning session and 18 kindergarteners for the afternoon session. The faculty parking lot which borders Comstock can also be seen.
4-7	Views of the Comstock side of Highland Park School. Note the faculty parking, janitor entrance and gym entrance (single doors). There are no curb markings or signing along the street. Per a telephone conversation with Highland Park School, 04-11-03, these entrances are not normally used by students.
8-10	Views of the Earling side of Highland Park School. Note double doors, school bus signs, and lettering on building for the Earling door--all clues that this is a probable entry for children. Per a telephone conversation with Highland Park School, 04-11-03, this is the designated entrance for 44 children, grade 4. Note double doors and wide sidewalk leading to playground door on Earling (northeast entrance). Per a telephone conversation with Highland Park School, 04-11-03, this is the designated entrance for 119 children, grades 1-3.
11-13	Views of the First Lutheran Church as it borders Stower. Note the three designated handicapped parking spaces in the parking lot at the rear of the church and the one along the curb on Stower (the rear of which was visible in the EA photograph on page 8). A visual analysis shows that there is currently adequate room for a hearse to park at the side door without obstructing pedestrian traffic (but may not be if the project is completed as designed).
14	View of the intersection of Sewell and Stower. Note the similarity with the EA photo on page 8; however, that photo fails to show the one way street sign and posted 15 mph speed limit. The proposed project will not increase access to MCC or the VA (currently via Moorehead, Earling, and Cale) because Sewell is a one way street going in the opposite direction. The field appears in the background. The right of way acquisition for this property was not included in the Draft or Final 2003-2005 Statewide Transportation Improvement Program (STIP) although MDT in Helena indicated it should have been and would be. (It did appear in the Final 2002-2004 STIP.)

## Response

Thank you for your comments and your observations. We have included your five-paged cover memo describing the photos, but have not included the 53 pages of photos due to space limitations. (Individuals wishing to obtain a copy of the 53 pages of photos, please contact MDT-Environmental Services Dept in Helena, MT.)

Your suggested edits have been incorporated and noted in the Addendum and in the revised text to the Environmental Assessment (EA). For example, the text relating to the school entrance and the speed limits has been corrected and included in the Addendum.

Morris Visual Survey cont.

15-16	Views of the intersections of Earling and Stower and Cale and Stower. Note the lack of sight distance problems. Cale is the "accident prone" corner for the proposed project. Based upon my observations, I suspect that a review of the accident reports for this corner would have indicated speed (sometimes in conjunction with road conditions, such as ice) played a major role in these accidents. It is worth noting that many traffic studies have indicated wider roads encourage higher rates of speed, regardless of any posted limit. This would tend to suggest that the proposed project may actually decrease the safety level at this intersection, rather than increasing it.
17-18	Views of two homes along the proposed project. As is obvious from these photographs, there is not a 56 ft. setback distance as used in the noise analysis in the EA.
19	View of one of the 15 mph speed limit signs on or around the project. The EA does not address the issue of the existing lower speed limit, but does indicate the City is "considering" one as an option for the projected project. The noise analysis uses an existing and design year speed limit of 30. As this sign indicates, that is not an accurate assumption for half of the western section of the proposed project.
20-34	Views of the actual traffic patterns around the school during the "high volume" parts of the day--student drop off and pickup. The highest volumes occur in the morning and afternoon, with lesser increases seen at lunchtime. These figures also show examples of the pedestrian and bicycle usage in the area, including older children crossing in the opposite direction (presumably Lincoln School students). As can be seen, the vehicles currently impact both Stower and Comstock (either by crossing or by traveling) since they park along the two streets (Cale and Earling) where the children's normal entrances/exits are located. The high traffic periods last approximately 15 minutes. Casual observation indicates this is also the majority of the traffic affecting Comstock. Completion of the Stower project will not change this traffic pattern (and may actually cause greater difficulties due the higher volume of traffic on Stower which can be anticipated to cause problems crossing or accessing Stower after dropping off or picking up children resulting in more congestion on Cale and Earling). A more economical and perhaps more viable solution to the Comstock problem may be the installation of some sort of traffic control device(s) at the intersection(s) of Comstock/Earling and/or Comstock/Cale.
35	This shows an example of the unofficial use of the playground for ball practice on a Sunday afternoon.
36-37	Views of the VA and Wibaux Park (taken from the same location--first looking right and then looking left). Wibaux Park borders Cale/Winchester as well as Strevell (which is indicated in the EA). Larger volumes of traffic routed down Cale/Winchester may indeed impact the park (such as for access and safety) and should have been examined, at a minimum, in the Cumulative and Secondary Impacts.

38-44	Views of Stower as it intersects with Eighth (blind corner) and then of Eighth over the railroad crossing and to Main Street. This is a portion of the entire anticipated route (according to documents in Appendix A of the EA, including a letter to Bill McChesney, MDT); however, the EA indicated in the text portion that no additional projects were planned. There are significant safety issues and possible historic impacts on this portion of the roadway (as well as the intervening portion of Stower which was not photographed for this summary). In order to avoid segmentation of the entire anticipated project, this area should have been evaluated (as David Galt, Director, MDT, indicated it would be in his letter of May 6, 2002). If no additional construction is planned (i.e., plans have changed since the March 2002 letter to Bill McChesney from George Luther, Jr.), it should certainly be anticipated that there would be a high volume of traffic generated for this area which is not equipped to handle it. This statement, of course, assumes that the intended purpose of the proposed Stower project is to improve connectivity (as stated in the EA) rather than to simply increase access to Haynes Avenue (which would be anticipated to have a negative impact on the downtown area and its merchants).
45-53	Views of vehicle parking at the First Lutheran Church for services on Palm Sunday. As shown in the photographs, parking was successfully accomplished, not only along Stower, but also along Cale, Batchelor, Earling, and in the parking lot (the majority being in these locations). No disagreements or fisticuffs were noted in the efforts of vehicles to park in these "undesignated areas" (bringing up the question of the necessity of "designated parking"). It should be noted that, for this service, only one of the four designated handicapped parking spots was in use as documented in the photographs.

**OTHER RELEVANT COMMENTS:**

- **Road Condition.** As can be seen in the photographs, the roadway in this section is in fair condition (as indicated in MDT's Preliminary Field Review Report dated August 14, 2000), rather than being poor and requiring repaving as indicated in the EA on page 5. To be fair, I included our one set of potholes in the photograph which is figure 24; however, as noted on that figure, these potholes were patched on 04-14-03.
- **Current ADT.** This is a destination neighborhood (i.e., the majority of traffic destined for the school, church, or home) as would have been noted if an Origination and Destination (O&D) Study had been conducted. The ADT figures used were from counts taken outside the actual project parameters (as conceded at the public meeting on February 28, 2002). The actual counts for this section of the project would be significantly lower. My estimate (using excessively generous factors) would be somewhere in the neighborhood of 10-20% of the figures used. I had contemplated doing an ADT count to present at the meeting, but, quite frankly, got bored waiting for any vehicles to come by (one or two per hour not being a very rewarding use of my time). The use of overstated ADT figures would be anticipated to distort the analysis of impacts in the EA (e.g., traffic, noise). Accurate ADTs for the other streets this project was predicted to "help" would also have been appropriate to include (but were not).

## Morris Visual Survey cont.

- **Projected ADT.** The EA indicates that Miles City has had a relatively stable population for the last 10 years (page 26). Per a conversation with Amorette Allison, our local Historic Preservation Officer, the population has been relatively stable for 100 years despite numerous predictions of great "windfalls" of population and prosperity for the community. The reality is that population declines in surrounding counties have affected our retail base and there is little in eastern Montana to attract new businesses. Our main hope is tourism. There is a high probability that tourists would be more attracted to our historic downtown area than to the area on Haynes avenue--as such, we need to strive to focus on that area and maintaining the beauty of our town's neighborhoods (making it an attractive oasis). The projected ADT figures for the design year may well be overstated, in addition to the current ones.
- **Traffic Composition.** The noise analysis on page 25 indicates an existing hourly traffic volume which includes 200 Autos, 3 Medium Trucks, and 4 Heavy Trucks. Although the total numbers are higher than exist, we do have the highest proportion of Autos (as would be anticipated for parents taking children to school, people attending church, or commuting to work). We have very minimal Medium Trucks (normally the UPS driver comes through on a daily basis), and we seldom see a "heavy truck." The composition of traffic, in addition to the amount, would be anticipated to have an effect on the noise analysis.
- **Level of Service (LOS).** The EA does not explain how the LOS analysis was done, nor for what period (assuming design year). My understanding is that the ADT plays a role in the evaluation of LOS, although I am not familiar with the exact degree of sensitivity involved in the actual computation. As discussed above, the ADT figures used were not accurate for the project. In addition, an evaluation of the LOS for other roads in the area might have been beneficial to the analysis. A great deal of time was spent on road improvements for Main Street (Highway 59, Historic 212) and I am troubled by the thought that design for this work might not have been up to the appropriate LOS (as implied in the discussions in the EA). (I am assuming, of course, that the proposed Stower project could not have been used for that LOS evaluation since it has not yet been approved.)
- **Noise Analysis.** The factors used for the noise analysis were not correct (ADT for both count and composition, setback distance, or speed). There may indeed be impacts requiring further evaluation if this analysis is done using accurate data.
- **Drainage.** Not all of the issues relating to drainage were addressed. There are currently problems when it rains due to an inadequate underground infrastructure. This will not be corrected with the project. In fact, increasing the road width will increase the area to be drained into these inadequate underground facilities and can be anticipated to cause an even greater degree of flooding. This, too, is a safety factor that should have been considered.
- **Property Values.** This concern was raised at the public meeting (and is a valid one for many of the residents, particularly those on limited incomes), however, it was not addressed.
- **Maintenance Costs.** The City has limited resources. There will be increased maintenance costs associated with completion of this roadway, as designed (a widening of approximately 38.64%). If accurate facts are used, the LOS analysis may not indicate that this proposed width is justified. In addition, if these same accurate facts are used, the impacts caused (e.g., traffic, noise, safety) may require additional evaluation. It does not seem appropriate to construct this sort of roadway if it is not justified. It could very well end up being a large and ugly albatross hanging around the neck of the City for many years to come.
- **Other Alternatives.** There has been a failure to adequately consider other alternatives to improve traffic flows, many of which would be significantly less expensive to implement. As examples, truck traffic could be routed to a much greater degree via the Interstate with its multiple exits or traffic signals could be installed at various locations to control traffic flow. The most prudent course of action may be to table this project until an adequate assessment of the true traffic situation for the entire city is done--preferably by professionals who are trained to recognize all of the cumulative and secondary impacts any given option may generate. Once you have destroyed this quiet residential neighborhood, it will be too late.
- **Public Involvement.** The EA discusses on page 41 that public comments were used to make "refinements" to the alternatives for the "Wilson and Strevell proposed projects." By implication of omission, the public comments were not considered for the Stower project. My review of the EA seems to indicate that the public comments for this project were right on point. Had the EA used full and accurate factual information in its analysis, the impacts found might have been much greater than those it discusses (which, as indicated above, showed the public was correct in its concerns). I have invested considerable resources (time and monetary) to provide you with the facts that should have been evaluated. I can only hope that they will be before a final decision is made.

*Attachment:  
53 pages of photos + captions*

# Comments by Topic, submitted by Karen Morris

on April 13, 2003

## COMMENTS - BY TOPIC Environmental Assessment Miles City Street Projects March 03, 2003

Prepared: April 7, 2003

*NOTE: I have extracted items from the Environmental Assessment (EA) which I felt were relevant to evaluating the Stower Street project, as proposed. I have included references to the EA for individuals wishing to read the full section involved and direct quotations for those only wishing to review a summary. I have included information from other publications (including references) which I found to be helpful in my analysis. I have provided my opinions in this summary fully aware that they may or may not be identical to that of the reader. They will, however, hopefully generate some thought processes. I also apologize for any "typos." I have done my best to catch them, but this summary was prepared as quickly as possible in order to be useful. Karen L. Morris*

### ENVIRONMENTAL ASSESSMENT STRUCTURE

**3.0 Impacts (Page 16)** "Conditions and impacts are common to all three projects and are therefore described together." This merging of analysis is sometimes misleading. This makes an educated and informed comment difficult.

**4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41-2) Paragraph 8.** "In summary, the proposed projects are generally well-received and supported by the majority of the Miles City community. Localized effects to adjacent residents and property owners along Stower Street have been voiced as the biggest cause for concern. However, as others have commented, 'It is important to keep the best interest of the City in mind, and the benefits of the three proposed projects outweigh the disadvantages.'" The concept of an Environmental Assessment is to do an unbiased review of the alternatives, including the no build alternative (required). This is a statement of opinion and not an appropriate comment to include in an unbiased analysis.

### PROJECT PARAMETERS/DESIGN

#### GENERAL

**2.0 Alternatives. 2.3 BUILD ALTERNATIVES. Stower Street. (Page 14) Paragraph 1.** This paragraph discusses the project as it extends from Strevell to Haynes. The remaining contemplated project (through Eighth) is not discussed even though

## Response

Thank you for your comments provided in this document. Revisions made to the Environmental Assessment (EA). We have incorporated the comments received during the public comment period into the Clarification to the EA (the Addendum). Responses to your specific comments and questions are noted in the right-hand on the following pages where applicable.

The EA did identify the impacts associated with the three proposed projects individually when the impacts differed between projects.

The term "well-received" has been stricken from the EA, as noted in the Addendum.

## Response

documentation indicating that intent is included in the appendices (December 15, 1988 City County Planning Board minutes, March 2002 letter from George Luther, and John Mark's January 8, 1999 letter). The EA should have covered the full anticipated project parameters (logical end termini) as indicated in Federal Highway Administration (FHWA) guidelines (to avoid segmentation). Specifically, under 23 CFR 771.111(f), "In order to ensure meaningful evaluation of alternatives and to avoid commitments to transportation improvements before they are fully evaluated, the action evaluated in each environmental impact statement (EIS) or finding of no significant impact (FONSI) shall: 1. Connect logical termini and be of sufficient length to address environmental matters on a broad scope; 2. Have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and 3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements."

### 3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 19) Paragraph 1.

"When completed, the Build Alternatives would improve access and safety for vehicular traffic." As very succinctly expressed in **Take BACK Your Streets** (Conservation Law Foundation), "Streets and roads do not exist in isolation from their surroundings. They pass through a landscape full of people who are somewhere rather than going somewhere." The convenience of the motorized traveler should not be placed as a higher priority to the rights and expectations of the neighborhood residents (such as described in FHWA's **Community Impact Assessment**--for example, security and solitude listed on page 16).

"Residents and visitors would benefit from improved connectivity between the east and west sides of town." With the wider roadway and no impediments (other than perhaps a child foolishly trying to cross the street), it certainly would be much more convenient to get there quickly with a direct route that is all of a maximum of 4 city blocks shorter.

"The response time for emergency services would decrease under the proposed projects." The firestation and ambulance services are on Main not Stower. There is no certainty and, indeed, it is highly unlikely that all of the emergency calls would be within this small area of Stower (bear in mind that the EA doesn't acknowledge that the Stower project extends beyond the stretch from Haynes to Strevell). A more cost effective solution might be the installation of an emergency light where the emergency vehicles enter Main and a second traffic light at Main and Strevell which could be controlled (turned red) by emergency vehicles. Total cost for this solution should be less

The Cumulative Impacts section has been modified as noted in the Addendum.

Thank you for your comments. These issues have been addressed in the Responses to Comments #60 and other comments provided in Appendix A.



## Response

than \$250,000 instead of the \$550,000 for this project, as designed, as indicated in the Preliminary Field Review Report dated August 14, 2000, page 9. (Note: The actual anticipated cost has probably increased from that estimate due to changes in the design such as adding in the detention pond.)

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Emergency Services (Page 22)** "The proposed projects may have a positive effect on the emergency services provided by the Miles City Police Department, the Emergency Operations Center (EOC) and the Miles City Fire Department. Improved roadway conditions and sight at intersections, along with the new connection at Stower Street, would serve to reduce travel time needed for emergency response." Interesting how it changed from "would" to "may" in 3 pages. "May" is correct. It would depend upon where the emergency is located. There is also the question of whether you wish to place emergency vehicles in possible conflict with children. The emergency vehicles would also contribute to the increased "noise pollution" that would affect this section of Stower. A reduction in travel time might be achieved, but probably not if the "promised" (or should that be "contemplated" by the City) lower speed limit was being observed.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 20) Paragraph 3.**

"While localized impacts would occur and increased traffic volumes beyond historic increases are projected for the proposed Stower Street project, the speed limits and number of travel lanes would not change in the proposed project corridors from existing conditions." As discussed in the SCHOOL section under **1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Safety. (Page 6) Paragraph 4.**, the 15 mph speed limit that currently exists for a large section of the project would no longer exist unless an ordinance is adopted by the City.

"Localized impacts often occur in order to benefit the community as a whole." It is worth noting that many of the people submitting comments in favor of this project indicated that they wanted to reduce traffic in front of their homes on Comstock or Main. What justification is there to "sacrifice" this particular neighborhood in order to shift the problem that these people find in their current situation to create an even larger one here (due to the much wider roadway being proposed)? Perhaps a better solution is to find a way to route outside traffic around residential areas in general.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Local and Regional Economics. (Page 26)** "Despite the even levels of population over the 10-year period, the commercial and retail services along Haynes Avenue have been increasing in number, including the

MDT compiled additional traffic information for the length of Stower Street after the public hearing was held. Results of this analysis are presented in the Addendum.

Routing traffic around the city was determined to not meet the purpose and need identified in the EA and would exceed the funds available to the city.

addition of a WalMart at the intersection of Stower and Haynes." The population of Miles City has actually remained relatively constant for 100 years. If the commercial and retail services (or those that seem to matter) are all relocating to Haynes and there is no population influx to stimulate new business, the question that must be asked is why additional access is necessary to the downtown area.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Local and Regional Economics. Impacts. (Page 27) Paragraph 2.** "Therefore, it would improve the travel convenience to businesses along both the Haynes Avenue corridor and along Main Street in downtown Miles City by local patrons that currently have to meander along neighborhood streets." "Meander" seems to be a slightly inflammatory and prejudicial term. On the other hand, meandering does seem to imply a safer speed so perhaps it's not all bad to maintain that status quo.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Local and Regional Economics. Impacts. (Page 27) Paragraph 6.** "The No Build Alternative would not provide any economic benefits to the Miles City community." I submit that it would not provide any detriments either, except perhaps, not providing the additional revenues to the City in converting the status of the property that comprises the field. In addition, from the perspective of the residents (including possible future residents), the No Build Alternative results in a more aesthetically pleasing community to live and work in. One should not forget that the "community" is actually comprised of many neighborhoods of residents--including the one along Stower Street. The "community" dies if no one finds it a viable and attractive place to live, work, or visit.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Local and Regional Economics. Impacts. (Page 27) Mitigation.** "Long-term economic impacts associated with the Build Alternative may be beneficial and would therefore not require mitigation." Highlight the word "may"--not definite that it would be beneficial even in the EA analysis.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Environmental Justice - Executive Order 12898/Title VI. (Page 28) Paragraph 5.** "The neighborhoods surrounding the proposed projects do not have higher percentages of lower income or minority people than other areas in Miles City." Exactly how did they do this cultural survey--or was it simply assumed since the population, as a whole, is relatively homogeneous?

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Environmental Justice - Executive Order 12898/Title VI. Impacts. (Page 28) Paragraph 1.** "the proposed projects would benefit all travelers and pedestrians in Miles City, regardless of ethnicity or income

## Response

While population levels have been constant, Miles City remains to be the commercial seat of the County and new businesses are being added to Haynes Avenue.

Access would be improved not just to downtown, but between the west and east sides of the city.

Thank you for your comments.

Environmental justice analysis is based on population data provided by the US Census, Custer County and the City of Miles City.

level." Suppose the same could be said about the level of detriment--except that it may be more likely to have a lower income child being a pedestrian.

#### **ROADWAY CONDITION/DESIGN WIDTH**

##### **1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Roadway Deficiencies. (Page 5)**

"The condition of the existing pavement on the three roads is poor and will require repaving regardless of the proposed projects." MDT's Preliminary Field Review Report (August 14, 2000) states on page 3 under **Physical Characteristics** that the "Surfacing is in fair condition with minor distortion of the template." It is a little difficult to comprehend how the roadway could have deteriorated so rapidly.

"The existing streets currently do not meet MDT design criteria for a level of service (LOS) B for local urban streets." I am assuming that a LOS B has to do with the "urban route" classification (rather than being just a normal "urban" street).

If not, the question would have to be posed as to just how many of Miles City's streets would meet the LOS B criteria. If so, the question must be posed as to the propriety of classifying this portion of Stower as an urban route (more fully discussed under **PUBLIC INVOLVEMENT, 1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. (Page 4)** .

"The present paved surfacing width for the existing streets is approximately 7.92 m (26 ft) compared to MDT's standard of 8.4 m (28 feet) for urban roadways." My mathematics may be a tad bit confused, but I see here a deficiency of 2 feet--definitely not the proposed widening amount of 11.9 feet. Of course, I admit to being a bit uncertain about where the discussed measurement lies--since it does not correspond with any of the measurements I encountered anywhere else in the EA. What about drafting a "user friendly" document that the public can fully understand so that they can comment intelligently? In **Community Impact Assessment**, FHWA indicates that the "Project staff can facilitate public participation by . . . Avoid(ing) technical jargon and rephras(ing) issues to encourage participation" (page 34).

It is worth noting some of the comments Walter M. Kulash makes in **Residential Streets**. Specifically, "The overdesign of streets should be avoided. Excessive widths or an undue concern with geometry more appropriate for highways encourages greater vehicle speeds." (page 7) "Residential street designers should select the minimum width that will reasonably satisfy all

## **Response**

The requirements for LOS (Level of Service) may differ based on the functional classification of the roadway.

As stated on page one of the FONSI, if, at any point in the EA process, the Federal Highway Administration determines that the action is likely to have a significant impact on the environment, the preparation of an EIS will be required." Due to the projected increase in traffic, public controversy and potential for significant impacts concerning the proposed construction on Stower Street, MDT and FHWA have selected the No-Build Alternative for this project. No significant impacts are anticipated on the Wilson Street and Strevell Avenue projects and, therefore, the build alternatives were selected for these projects.

Please see the revisions to the conceptual design of proposed projects noted in the Clarifications to the Addendum. Also, note Figure 4 Conceptual Cross-sections. The differences you have referred to may be attributed to measuring from front of curb to front of curb versus back of curb to back of curb.

realistic needs, thereby minimizing construction and annual maintenance costs, while at the same time maximizing the livability of the community. The tendency of many communities to equate wider streets with better streets and to design traffic and parking lanes for free-flow traffic is a highly questionable practice. Certainly providing for the free flow of traffic in two 11- or 12-foot lanes can encourage traffic to speed." (page 22) Mr. Kulash recommends a width of 34-36 feet for a residential collector (two 8 foot parking lanes and two 10 foot driving lanes vs. the 9.5 feet and 11.8 feet indicated by MDT) (page 24). "A wide access street also lacks the intimate scale that makes an attractive setting for housing." (page 23)

"The proposed projects would bring the streets up to standard, along with making them consistent with other improved roads in the urban area." Which roads are we comparing this to? What about the concept of variations to the "standard" such as have been done in Helena where they have successfully adopted a total street width of 33 feet, including parking on both sides (**Residential Streets**, Walter M. Kulash, page 50)? An element of inconsistency will be being introduced in that Stower from Strevell to Eighth will not be as wide as the proposed construction width for the section from Strevell to Haynes.

**Abstract, Paragraph 1:** "projects would involve minor widening".  
**1.0 Purpose and Need. 1.2. PURPOSE OF PROPOSED PROJECTS.**  
**Paragraph 1. (Page 1)** Also addresses the "minor widening" concept. The EA states that existing Stower Street width for western section (Strevell to Sewell) is 30.8 feet (page 12) and that this section will be widened to 42.7 feet (page 13). This is an increase of 11.9 feet or approximately 38.64% which would normally not be judged "minor" by the average individual.

**2.0 Alternatives. 2.3 BUILD ALTERNATIVES. Table 1. (Page 13)**  
Why should Stower Street, a residential area, be as wide as Wilson Street which includes the hospital? As discussed earlier, looks like a bit of overdesign.

## **SIDEWALKS**

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Roadway Deficiencies. (Page 5)** "Partial sidewalks provided at best."

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Safety. (Page 6) Paragraph 2.** "the existing project corridors include limited, if any, continuous sidewalks. As few continuous sidewalks are provided, pedestrians currently must walk along the edge of the roadways, creating an unsafe condition and the potential for vehicular conflict."

## **Response**

Thank you for your comments. The existing speed limits will remain the same should the proposed projects be implemented.

Thank you for your comment. Standards referred to are those recommended by MDT for urban collector streets.

All streets would remain classified the same as their existing classification (urban collector streets) should the proposed projects be implemented.

We used the term "minor widening" because the proposed projects would rely generally on city-owned right of way and additional lanes would not be added.

## Response

2.0 Alternatives. 2.2 NO BUILD ALTERNATIVES. Stower Street. (Page 12) "Only portions of sidewalks exist in various locations along the paved street in the eastern and western sections."

3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Pedestrians & Bicycles. (Page 19) Paragraph 1. " . . . sidewalks . . . are only present in some areas along the Stower Street proposed project corridor."

2.0 Alternatives. 2.3 BUILD ALTERNATIVES. Stower Street. (Page 14) Paragraph 3. "The existing curb, gutter and sidewalk would remain in place for the eastern section."

The discussion regarding sidewalks is another example of confusion brought about by combining the analysis for the three projects. For Stower, sidewalks are actually present in much (although not all) of the area where they would be "expected"--the most notable lack of sidewalk being the field (where one normally does not expect to find a sidewalk). Some of these sidewalks are attached to the curb (required approval of a special variance) while others are offset by a boulevard. It should also be noted that sidewalk is not planned for the eastern portion of Stower where it is not in existence, nor is it planned for parts of the other two projects.

### **PARKING**

1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Safety. (Page 6) Paragraph 3. "Currently, little to no designated parking is available along the three corridors." The vast majority of Miles City does not have "designated parking" nor am I aware that that lack has caused any great inconvenience. This is a small town (city if you prefer). People park along the street unless it is designated as a no parking area. They don't need to be given a "designated" area. "Under existing conditions, there is insufficient room for two lanes of traffic to pass each other when cars are parked on both sides of the street." Quite true--also not very common. Usually this happens when there is an exciting local event like a rummage sale or a soccer game or practice. Considering the fact that this section of Stower normally has more pedestrian and bicycle traffic than it does vehicle traffic, this limited space has not provided any great amount of inconvenience. In addition, it serves to keep traffic speeds lower, thus enhancing safety.

3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Parking. (Page 19)

"Informal parking currently exists in few scattered areas along

Sidewalks are included in the proposed projects. The location of sidewalks is described under the project description and Table 2 in the Addendum.

Thank you for your comment. Please see response on next page.

the project corridors." The majority of Miles City has "informal parking" which is completely in line with the norms for a community of this size. This statement implies there is a problem with the "informal parking"--whether it be the practice or the amount is open to interpretation. In addition, "scattered areas" is not an accurate descriptor for Stower where parking currently exists along the full length of the existing roadway. This is another instance where combining the analysis for the three projects has provided misleading information.

"Parking would be provided . . . in more areas along Stower." True. If the field is opened up, there is considerably more "parking" available. The question arises, however, as to who has a need or desire to park in the field. Most individuals tend to park as close as possible to their destinations. The businesses on Haynes have parking lots. The provision of additional parking at this distance would not seem to be of a benefit to the church, the school, or the various residents of the neighborhood. In fact, the additional parking area might be a tempting place for overnight "camping" for individuals traveling through--something that would not be beneficial from the neighborhood perspective.

"Designated parking spaces would be available for church members." Many of the church members currently park along Cale (which coincides with the front entrance to the church) in addition to parking along Stower. Adding "designated parking spaces" would not increase the actual amount of parking available. In fact, the widening of the Stower would result in decreasing the amount of parking in the church's parking lot. One also questions whether these "designated parking spaces for church members" would be forbidden territory for soccer or softball parents when children practice on the school grounds (even though not needed at the time by the church)? This seems to add more rules and regulations without providing any benefit.

## **BICYCLE ROUTES**

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Pedestrians & Bicycles. (Page 19) Paragraph 3.** No designated bicycle routes are included in the design for the projects; however, the paragraph indicates there may be some potential bicycle routes in the vicinity. The question arises as to whether it is not more efficient to consider this in the overall initial planning rather than adding them as a "tack on" item to a completed project. It is also interesting to note that the opinion has changed from the Preliminary Field Review Report (dated August 14, 2000) where advanced and recreational cyclists were anticipated to use the roadway, but younger riders were anticipated to utilize the sidewalks (page 6). All riders will

## **Response**

Thank you for your comments.

The proposed project include the designation of parking as a result of reconfiguring the streets to meet MDT standards. Designating parking is also helpful to improve sight distance at pull-outs, driveways and intersections.

Please see the responses in Appendix A to comments similar to yours related to parking.

Sidewalks will be provided as part of all three projects to accommodate inexperienced and/or young bicycle riders.

## Response

now be expected to use the shoulders of the roads. The EA does not address how the younger cyclists are expected to accomplish left turns off of or cross Stower with the increased traffic loads (which may be necessary for those headed to Highland Park School).

### ACCESS/TRAFFIC VOLUME/NOISE

#### ACCESS-GENERAL/MAIN/HAYNES

**Abstract, Paragraph 2:** "This connection has been called for in City plans as essential for improving traffic circulation in the City and reducing congestion on other heavily traveled streets."

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. Stower Street. (Page 5)** "Stower Street proposed project is anticipated to improve circulation for the City overall the most."

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Access. (Page 17)** This paragraph implies a large amount of traffic needing access and direct connection.

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. Stower Street. (Page 5)** "Stower would provide direct access to the commercial development along the Haynes Avenue corridor. This connection would alleviate the existing traffic congestion along Main and Haynes by providing a more direct route to these two corridors."

Miles City does have "traffic" on a periodic basis, but not an amount that would necessitate the virtual destruction of a quiet residential area. This is not the appropriate routing of traffic. As stated by Walter Kulash in **Residential Streets**, "Traffic in residential areas should be kept to a minimum to reduce noise, congestion, and hazards to pedestrians." (page 7) This is the most recent concept regarding appropriate urban roadway design. It should be remembered that Haynes Avenue and Main Street are actually highways (Highway 59 and Historic 212) and thus, should be anticipated to have larger amounts of traffic. Stower Street from Sewell to Strevell is a strictly residential area. Traffic appropriately belongs on highways and in business districts--not disrupting a residential neighborhood.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Access. (Page 17)** "Opening up Stower Street between Sewell and Moorehead Avenues has been a long-term plan of the City's, and the basis for installing a signal on Haynes Avenue at the Stower Street intersection." Definition of "long-term" might be in order. The residential neighborhood existed long

The designation of Stower Street would not be changed from that of an urban collector street should the proposed project be implemented. Existing stop signs and speed limits would also remain as is should the proposed projects be implemented.

## Response

before the businesses on Haynes Avenue were developed. In an overall time perspective for the community, WalMart is a relatively new arrival. The signal might have been installed at Comstock (more logical for existing traffic patterns) or some other location if it were not for WalMart picking up a share of the cost for installation on Stower.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Land Use (Page 23) Paragraph 2.** "Miles City's main commercial corridor is developed along Haynes Avenue, which serves as the eastern boundary of both the Stower Street and Wilson Street Projects." I am certain that all of the downtown merchants will be pleased to know that they have been displaced in priority. While it is certainly true that the largest retail outlet (WalMart) resides on Haynes, that does not necessarily convert Haynes Avenue into the main commercial corridor. There are a large number of businesses in the downtown area, along Valley Drive, and along Main Street on the way downtown. In addition, if Haynes is the primary commercial corridor, why is it necessary to develop such a large road to transport vehicles to the downtown area?

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Access. (Page 17)** Figure 3 contains some omissions, the inclusion of which might affect the analysis of the situation. Specifically, although it shows the college and the VA (both of which are closer to Main than to Stower), it fails to include Highland Park School and Wibaux Park. In addition, it does not include the railroad crossing on Fourth. This crossing might provide a better "balance" for the routing of traffic since it provides a greater distance between available routes. The inclusion of the Leighton Blvd. crossing in the current proposals for possible railway grade separation locations (over or underpasses) has also not been mentioned. The selection of this site would be anticipated to affect traffic patterns. In addition, it should be noted that, although Eighth has been indicated as a planned site for an over or underpass (December 15, 1988 City County Planning Board minutes, March 2002 letter from George Luther, and John Mark's January 8, 1999 letter), this crossing was not a "finalist" in the MDT railway grade separation analysis. In other words, there are a multitude of alternatives that do not seem to have been fully evaluated for the routing of traffic. Surely it is possible to find one that avoids routing large amounts of traffic through a residential neighborhood.

### ACCESS-HOSPITAL

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. Stower Street. (Page 5)** "The Stower Street connection would also improve direct access for emergency vehicles that currently use neighborhood streets to travel to the Holy

Both the Main Street and Haynes Avenue commercial corridors are referred to in other sections in the EA.

Thank you for your comments. A discussion of the railroad crossings has been included in the Cumulative Impacts section as noted in the Addendum.



Rosary Health facility." Stower does not go by Holy Rosary. Wilson does. Both Haynes and Strevell provide a connection to Wilson. In addition, as pointed out in a letter to David Galt, Director, MDT dated April 29, 2002, the First Lutheran Church is the designated evacuation site for the children at Highland Park School. It would not seem prudent to create a conflict between evacuating children and emergency vehicles in the event of a local crisis (probably a conflict of interest for those parties under their Homeland Security preparedness plans).

#### **ACCESS-MCC/VA**

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. Stower Street. (Page 5)** "Stower Street improvements would also serve college and Veterans Hospital traffic, thereby providing some relief to Dickinson Street, a large carrier of college traffic."

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. Stower Street. (Page 5)** "Dickinson, east of Sewell, is an area with a higher incidence of pedestrian/vehicular conflicts due to the college buildings in the vicinity."

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. Stower Street. (Page 5)** "Therefore, development of the Stower Street link may assist in reducing the traffic hazards on Dickinson in the college area by providing an alternative route to access the college."

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Access. (Page 17)** "In addition the Stower Street connection would improve access to the Veterans Hospital, for staff, visitors and emergency services, and to the Community College for college-related traffic which currently relies on Dickinson Street."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Schools. (Page 22) Paragraph 5.** "The College administration supports the Build Alternatives as a way to improve access to and from the campus. The No Build Alternative would not create these positive travel effects for the College students and staff."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Hospitals. (Page 23) Paragraphs 2 & 3.** "The Veterans Affairs Eastern Montana Health Care System is . . . located north of the Stower Street project, which focuses on providing extended care service. . . The proposed projects would improve access to the medical facilities and reduce travel times."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources.**

## **Response**

Even though the Holy Rosary Health facility does abut Wilson Street, emergency service providers have stated that the Stower Street connection would improve connectivity and thereby assist in improving their response time.

Thank you for your comments. Response to your comments related to access are provided on next page.

**Schools. (Page 21) Figure 4. Community and Environmental Resources.** This figure fails to indicate that Sewell from Batchelor to Comstock is a one way street--an important issue in the analysis for the traffic flows and impacts.

Unfortunately, the drafters of the above statements and figure 4 (map) failed to do a full survey of the area. No one seemed to notice that Sewell is a one way street from Batchelor to Comstock going away from MCC. The completion of the project on Stower will not to improve access to MCC. Stower and Dickinson are parallel streets. The traffic would still have to go to Dickinson to access the college either via Moorehead or Cale/Winchester (since Sewell is a one-way street from Batchelor going in the opposite direction). Perhaps a better alternative for the college is a route off of Main (which is closer and could also serve the VA via the rear). This route would also avoid Dickinson (minimizing traffic) for those individuals parking in the first parking lot. Access to MCC remains the same whether the Stower project is completed or not. If additional road projects such as Sewell are planned, these should have been included in the Environmental Assessment.

I would suspect that college students are probably better equipped to deal with traffic issues from a pedestrian perspective than are children at Highland Park School, grades K-4. This area has had significant "close calls" (as well as the actual accidents) with the minimal traffic that currently exists. Of course, part of the problem in this neighborhood may be seen to lie with the city and the lack of enforcement of pedestrian right-of-way and the posted 15 mph speed limit. The same is probably true for the MCC area. Perhaps, what is actually called for is better enforcement of the pedestrian right-of-way provisions in the law--something road construction cannot achieve.

Unless something changes, there is not a large amount of traffic for the VA. Currently, there is minimal medical care provided at this facility and the community has been seeking some alternative function for the facility (which the EA fails to mention). According to my calculations, it is closer for traffic to the VA to route down Main Street and turn onto Winchester than to route down Stower and turn onto Cale (which becomes Winchester). Cale is also a narrow street and routing additional traffic for the VA in that direction would also have an impact on Wibaux Park (which the EA states the project will not have).

I read with interest one of the letters submitted in favor of the Stower project which was from Shelly Wright. Ms. Wright indicates that she is developing a strategic plan for a Technology Center that would be located either at MCC or the VA. She states, "If there were a through street at Stower, it would be much easier to give directions to out of town clients. I could instruct them to

## Response

Figure 4 was intended to illustrate the main activity sites in the vicinity of the proposed projects.

The proposed projects are viewed by the City as a means of improving access to MCC.

Discussion of safety related to the Highland Park School is addressed in the responses in the previous section. As described in the Addendum, the proposed Stower Street project would result in reduced traffic along Comstock, in the front of the elementary school.

Thank you for your comment.

## Response

turn left at the light located on Stower Street coming into Miles City from the Haynes Ave. exit. Then I would have them turn right at Sewell Ave. for those attending a class at Miles Community College, or have them turn right at Cale Ave. for those attending a training session at the VA Medical Center." Apparently, Ms. Wright has not closely examined the streets since it is her intent to send all of her clients with an MCC destination down a one way street headed in the wrong direction! Perhaps she would be better advised to provide directions via Main street since that actually provides closer access. It is a worthwhile reminder, though, that not all letters in favor of the project necessarily present accurate or valid scenarios.

### **TRAFFIC VOLUME/NOISE**

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. (Page 5)** The discussion regarding the replacement of the four-way stop at Main and Strevell with a two-way stop fails to provide full details. Many people realized that there was a high probability this was being done to shift additional traffic to Stower. What was not mentioned is that there have been subsequent discussions that a traffic light might be a better alternative (which was also MDT's opinion according to MDT in Helena at the time of the original change). If Urban funds were not being used for Stower Street, they could be used instead to erect a light at this location, including the mechanism allowing emergency vehicles to change the light to red as they approached. Bill McChesney presented very misleading and inaccurate information at the city council meeting when the four-way stop/two-way stop/traffic light issue was discussed. After an editorial in the paper presenting facts received from MDT in Helena, he backtracked to some degree, but still did not provide full and accurate information.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Traffic data. (Page 18) Table 2.** The ADT figures (2280 for 2000) used have not been changed from the time of the public meeting, although it was conceded at that meeting that these counts represented the traffic on the portion of Stower from Strevell to Eighth (versus the short section contemplated for construction). Adjusting the traffic counts for the actual portion of the Stower scheduled for construction would indicate a much greater impact. Currently, pedestrian and bicycle travel exceeds motorized travel most evenings during the warmer months in this section. Interesting how the EA does not contemplate the full length of Stower/Eighth unless it is more beneficial for the presentation of their perspective. In addition, is it reasonable to route the same amount of traffic through a residential area as is served on Main Street which is a highway (2022 Year ADT under the Build Alternative)? Also interesting to note that the traffic

The City may determine to install traffic lights or signals at certain locations in the future.

Please see the Addendum for updated traffic data and projections provided since the release of the EA.

on that highway is anticipated to be less in 2022 than in 2002 should the project go through (8060 vs. 9380).

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Traffic data. (Page 18) Paragraph 3.** "For the Stower Street proposed project, however, traffic is projected to increase above the historic rate associated with the No Build Alternative." Why does the EA include adjectives/descriptors for certain issues, but fail to add in the word "significant" here? An amount of traffic that is more double the No Build Alternative (8060 vs. 3520) would seem to be a "significant" increase and the presentation would be more accurate if it were thusly identified. The EA also does not address the issue of what happens to this greatly increased amount of traffic once it reaches Strevell. Presumably, a large portion of the traffic is anticipated to continue down Stower through Eighth to downtown. This brings up the issue of the hazardous intersection of Stower and Eighth, the railroad crossing at Eighth, and access problems for traffic trying to cross Bridge. Had the EA been done using the appropriate logical end termini, these issues would have been addressed (secondary and cumulative impacts).

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Traffic data. (Page 18) Paragraph 4.** "As shown, a notable relationship is projected between traffic forecast for Main and Stower Streets under the No Build and Build Alternatives. If constructed, the Stower Street proposed project would serve to alleviate the traffic along Main Street to the point where the traffic forecast for both streets would be similar under the Build Alternative for year 2022." Notable, indeed! This paragraph accurately portrays the fact that Stower and Main are anticipated to bear an equal amount of traffic; however, it omits the small (?) detail that one is a residential area and one is a highway.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Traffic data. (Page 18) Paragraph 6.** "Additional traffic data is scarce. A traffic study was conducted before building the WalMart facility at the northeast corner of Stower and Haynes. This study estimated, that upon build-out, 5,700 cars would use this intersection per day. This data, coupled with the City's traffic plans, led to the construction of a traffic light at this intersection."

If a traffic study was done before building WalMart, why couldn't one have been done in conjunction with this project (instead of simply identifying that "data is scarce")?

There is a significant difference between 5,700 cars using the intersection per day and the numbers presented in Table 2. The time frame for the 5,700 is not identified, nor is the direction of the traffic (intersection "use" may involve vehicles turning

## Response

Thank you for your comments on this page related to traffic impacts. The Addendum now addresses impacts for the Stower Street proposed project west of Strevell to 8<sup>th</sup> Ave. in the Traffic Impacts and Cumulative Impacts sections. Please see these sections and the responses provided in Appendix A.

## Response

the other direction or going straight). Clarification would seem to be in order so that the reader could identify which figures are more accurate.

Once again, there is a failure to mention the cost factor that WalMart paid for a portion of the traffic light (which may have been a significant motivating factor for locating it at an intersection that was not "logical" in accordance with current traffic flows). Using the light as justification for putting Stower through is very similar to what will undoubtedly happen to the remaining portion of Stower (from Streveil through Eighth) if the current portion being contemplated is constructed. Segmentation does not provide the affected parties with a reasonable opportunity to have input in the decision making process.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Traffic data. (Page 18) Paragraph 7.** "While traffic volumes would increase on Stower Street under the proposed project compared to the No Build Alternative, traffic volumes on other streets, including Main, Dickinson and Comstock Street, would likely decrease as travelers on these streets could choose to use Stower Street as an alternate east-west route."

Where is the ADT information for Dickinson and Comstock (provided for Main)? How does the reader know that traffic is truly a problem there (other than from reading the letters from "concerned citizens" on Comstock wanting Stower to go through in order to reduce traffic in front of their homes)?

Traffic for the college will still have to use or cross Dickinson even if the Stower is in place. MCC's campus is located on Dickinson (seem to keep forgetting that factor in the analysis).

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 19) Paragraph 2.** "However, under the Stower Street proposed project, adjacent property owners would be affected by increased traffic volumes along that street more so than those increased volumes associated with the No Build Alternative." The actual increase is much more significant than indicated in the EA due to the use of ADTs from an area of higher traffic on Stower not included within this project's immediate parameters.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 19) Paragraph 2.** "However the bulk of traffic volume increases would likely occur between Sewell and Haynes." Likely occur? Takes a real rocket scientist to figure out that adding a new roadway section would provide for the most increase in traffic--most days, the current ADT for this section is a maximum of 4 (two horses, one human, and one dog); however, we have seen

For comments on this page, please see response provided on previous page.

it as high as 10 when there were an additional six visiting rabbits.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 20) Paragraph 4.** "The No Build Alternative would not result in traffic increases on Stower Street. It would have none of the benefits, however, to the City's overall traffic patterns and access associated with the Build Alternatives. It would also not bring streets up to design standards and therefore would not serve to improve safety of traveling conditions with wider lanes and shoulders and clear zones at intersections. It would not provide the positive effects of improved pedestrian facilities, access and safety." Presented this way, the No Build Alternative does not sound as positive; however, the reality of the situation may be somewhat different. First, the lack of increase is even more significant in light of the use of ADTs in the analysis that were for a more heavily traveled portion of Stower. Second, as discussed in the ACCESS section, the completion of the Stower project will not solve the traffic pattern issues for MCC or the VA--in fact, it may create more problems with vehicles going the wrong way on a one-way street. Third and very important, the "standards" being used are not necessarily the "best" ones for a residential area. Helena (**Residential Streets**, page 50) has successfully implemented narrower street widths (33 feet including parking on both sides--not much wider than this neighborhood's current 30.8 feet). The wider street width proposed may be expected to increase the speed of the traveling public and, therefore, pose more of a safety issue than the narrower one currently in existence. It must be remembered that the motorized traveling public is not the only entity of concern--the nontraveling public (i.e., the residents) and pedestrians and bicyclists also need to be considered. Finally, among these "improved" facilities are the crosswalks which currently exist and are frequently currently ignored by the traveling public. The slower speeds necessitated by narrower street widths are also a very valid measure of safety to pedestrians since adequate respect and enforcement of pedestrian right-of-way in a crosswalk is not a reality in this community.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Noise. (Page 25) Paragraph 2.** This section indicates that the preliminary noise assessment was completed using assumptions of "Existing year ADT of 2370," "Design year ADT of 8060," "Existing and Design Year speed limit of 30 mph," and "Setback distance for residences of 56 ft." These assumptions are not correct. As previously indicated, the current ADT for the portion of Stower from Strevell to Moorehead is considerably lower than 2370. The current speed limit is 25 mph (as required by Montana Code section 61-8-303) for approximately half of that distance, with the remainder being posted as 15 mph due to the school (although the City ordinance to support this limit as required by Montana Code section 61-8-310

## Response

Thank you for your comment. Please see the responses to similar comments related to the need and safety of wider streets provided in Appendix A.

Clarifications to the text are now included in the Addendum and in the response from Ray Mengel of MDT presented earlier in this Appendix B.

does not exist to support this reduction). I seriously doubt if all of the residences have a setback of 56 feet although I confess that I have not measured each. These erroneous assumptions may have rendered the preliminary analysis faulty.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Noise. (Page 25) Paragraph 3.** The table shows that there are currently "4 Heavy Trucks" per hour which is not an accurate assumption for this portion of Stower (unless "Heavy Trucks" are much lighter than I think). In addition, this table projects "12 Heavy Trucks" per hour which is a major concern for reasons other than just noise assuming this projection is accurate.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Noise. (Page 25) Paragraph 4.** "Additionally, the increase in noise levels is well under Montana's definition of a 'substantial noise increase,' an increase of 13 decibels or more over existing levels." This statement may not be true once the analysis is adjusted for the factors discussed for paragraphs 2 and 3.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Noise. (Page 26) Paragraph 5.** "Because of the predicted increase in traffic volumes for the proposed project, MDT will conduct ambient noise monitoring in the neighborhood to assess the existence of non-traffic noise sources and to verify distances from susceptible receivers to the roadway. A final noise analysis will be completed prior to the final determination of environmental impacts." Unfortunately, a bit late for the public to be able to comment that analysis. One can only hope they manage to get all of the factors correct this time.

## **SAFETY**

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Safety. (Page 6) Paragraph 1.** "An engineering study evaluation was not performed because detailed accident analysis data and statewide average accident rates were not available for Urban Routes within the city limits." A full analysis was not done regarding the accidents, yet it is stated that the accidents occurred at intersections and the proposed projects would improve the sight distance at the intersections, thus improving safety. A casual review of the intersections in question would indicate no real impediments with regard to sight distance. I would suspect, based upon the several accidents that have occurred at the intersection of Stower and Cale in recent years, that speed (particularly in conjunction with poor road conditions such as ice) is the major culprit. As indicated above, widening the roadway would be expected to increase the speed of vehicles, which would, in turn, be expected to have an adverse affect on safety. It is interesting to note that, even with the limited traffic now

## **Response**

Please see the additional analysis and clarifications provided in the Addendum related to traffic and noise impacts.

It is the professional opinion of City and MDT engineering staff that the proposed projects would improve sight distance at intersections and thereby reduce potential for vehicular conflicts.

## Response

on this section of Stower, this street had the highest number of recorded accidents over the three year period of 1997-1999 (11 vs. 4 for Wilson and 3 for Strevell). A higher volume of traffic (particularly if traveling at a higher rate of speed) may be anticipated to increase this number of accidents.

### DRAINAGE

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Stormwater Drainage. (Page 6) Paragraph 1.** "Portions of the three proposed projects do not have gutters to allow stormwater to drain effectively. During and after large storms, portions of the three streets are inundated with run-off." The portion of Stower that is lacking gutters is an open field. The issue for Stower (which does suffer from flooding) is one of an insufficient infrastructure (underground drainage system) to handle the current water flows. Increasing the width of the roadway is anticipated to increase the amount of water to be drained; however, this issue is not being addressed. The issue has been brought to MDT's attention both at the public meeting and in subsequent correspondence. "Stormwater currently drains . . . Wilson Street." This statement implies that all of the projects are draining into the ditch by Wilson which is not accurate.

**Abstract, Paragraph 1:** "Improved drainage facilities would also be provided with all three projects.

**2.0 Alternatives. 2.3 BUILD ALTERNATIVES. Stower Street. (Page 14) Paragraph 7.** "Concrete valley gutters . . . would additionally improve drainage by providing areas for surface drainage to drain at intersections."

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Stormwater Drainage. (Page 7) Paragraph 2.** "Thus, all three proposed projects would include making improvements to the drainage system over existing conditions. However, it should be noted that the budget for the proposed projects does not include the funds needed to replace the underground drainage system in the vicinity of the project corridors."

Interesting how the only item that might be a "real" improvement was slid in only once and indicated that it will not happen. They also seem to have omitted the fact that a larger roadway surface will result in an even larger amount of runoff to be collected. It is also worth noting that not only the drainage system, but other parts of the infrastructure (such as the water lines) suffer from aging. Increasing the traffic load on the street may be expected to decrease whatever life these lines may still have remaining necessitating repairs or replacement (which is not in the budget for the city). When the water line stop was replaced

The proposed projects do include making some but not all improvements desired to the existing drainage conditions in the three project corridors. The proposed projects do include the addition of new gutters and retention ponds. The City is working on addressing other drainage issues with an independent engineering consultant.



at our house, the city would not turn off the water for fear of causing pipe breakage up the street--so a larger hole had to be dug and the plumber worked in a pond of water.

**3.0 Impacts. 3.5 CONSTRUCTION. Utilities. (Page 37) Paragraph 2.** "Stower Street: . . . new water, sewer and power service to be provided from Sewell to Moorehead possibly." In light of the infrastructure problems the City currently has with water lines (see discussion above), it is questionable whether attempting to extend these lines (assuming they are the same ones) is prudent.

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Stormwater Drainage. (Page 7) Paragraph 2.** "The Stower Street project would include the addition of a new detention pond." There has been considerable discussion about the hazards of a detention pond, yet this is the option MDT decided was most viable. Do neighborhoods get a group discount for West Nile virus treatment? Most communities are making every effort to ensure that standing water does not exist due to this potential threat.

**2.0 Alternatives. 2.3 BUILD ALTERNATIVES. Stower Street. (Page 14) Paragraph 6.** MDT seems to like detention ponds, but most neighborhoods do not. A 20 x 30 foot pond has the potential to be a sizable mosquito habitat. In addition, I was unable to find the details of who would be performing any maintenance and ensuring that the area did not become an eyesore (also known as an "attractive nuisance" to use the terminology in the EA). Finally, if a 6 foot chain link fence is not adequate to fence children in on a playground (which it is not always capable of), why should it be adequate to fence them out of such a tempting area?

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Water Quality. Impacts. (Page 31) Paragraph 2.** "The detention pond is not anticipated to be a nuisance or a hazard." The vast majority seem to be--why would this one be any different?

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Visual Impacts. Stower Street. (Page 26)** "The detention pond would likely be surrounded by a six-foot chainlink fence and landscaping." On page 12, it was indicated that it "would" be surrounded--now this has changed to "likely." What happened to the safety and aesthetic awareness issues?

## **VISUAL IMPACTS**

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Right-of-Way and Relocations (Page 24) Paragraph 5.** "For the Wilson and Stower Street proposed projects, some adjacent property owners have expressed concern that they would lose trees, landscaping and parking in front of their properties. Some mature trees and

## **Response**

Thank you for your comments.

Thank you for your comments.

Please see response to similar comments regarding detention ponds in Appendix A.

Response provided on next page.

## Response

Revisions to the text in the EA related to visual impacts are noted in the Addendum.

landscaping, which have existed on City-owned land, would need to be removed for this project. Cognizant of this concern, MDT made modifications to the original proposed project plans in an effort to save as many trees as possible." The Preliminary Field Review Report indicated a total width from curb to curb for the section from Strevell to Moorehead of 12.6 m (41.9685 feet per my conversion calculation). At the public meeting, the width was indicated to be two 12-foot driving lanes and two 9 1/2 foot parking lanes (total of 43 feet per my calculation). The Environmental Assessment indicates a total width of 13.02 m or 42.7 feet (higher than the initial proposal, but 3.6 inches less than the public meeting). In addition, sidewalks have been reduced from 1.8 m (5.9 feet) which is I believe is the standard width under building codes to 1.525 m (5 feet). I am assuming that the City intends to grant a variance regarding the width of the sidewalk although it must be conceded that the narrower sidewalk may not provide the same margin of safety. At the public meeting, the width was presented as being 5 feet, although there was some question regarding the conversion measurement. Based upon the initial proposal, there has been a reduction of 10.8 inches for each sidewalk (total 21.6 inches). A reduction of approximately 2 feet (which may not be the total amount if no variance is granted for the sidewalk--3.6 inches being the reduction in that case) while leaving a widening of the roadway of 11.9 feet would not seem to be an excessive attempt to preserve trees. In fact, I doubt that this reduction will save any of the trees. It is also worth pointing out that, over the years, the City encouraged residents to maintain and beautify the property in the right-of-way (many residents didn't even truly realize how great that area was), yet now the phraseology implies these residents have done something the equivalent of violating someone else's property. This situation exists all over the city. Property owners are expected to maintain the right-of-way, including shoveling the sidewalk. If the residents of Stower street are guilty of misappropriating the City's property, they are certainly not alone (would suspect the majority of our City leaders have done the same themselves although I have not done a survey).

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Visual Impacts.**  
(Page 26) Paragraph 1. "However, all three proposed projects would include the addition of roadway enhancements, including wider travel lanes and the addition of curbs, gutters and sidewalks. The Wilson and Stower Street proposed projects would also require the removal of portions of landscaped vegetation and several trees that exist in the city's-owned right-of-way." Trade trees for asphalt and concrete! Only an engineer would even contemplate calling asphalt an "enhancement." The average individual (and even many engineers), in my experience, find trees and vegetation to be more aesthetically pleasing.

## Response

Response noted on previous page.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Visual Impacts. Mitigation. (Page 26)** "The changes to the visual environment associated with the proposed projects are not considered to be major, and therefore no mitigation is required." Not certain what "major" would be under the EA's definition (of course, the EA considers 38.64% "minor" widening), but it must be something along the lines of razing the entire neighborhood including structures. The majority of individuals would consider removal of all of the trees to be a major visual impact.

### SCHOOL

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Schools. (Page 20) Paragraph 1.** "One public school is affected by the proposed projects." While it is true that Highland Park is the only school directly impacted by the project bordering its grounds, there will also be impacts to the students at other schools such as the Lincoln students who must cross Stower (either within the current defined project limits or further down Stower), as well as High School students trying to drive across Stower to get to school. My understanding is that the actual physical boundaries defining which school is attended are adjusted each year to consider the number of students per classroom; however, an attempt is made to minimize the number of students that must cross the traffic on Main Street. Assuming the Stower Street project is completed and has traffic levels equivalent to Main (as indicated in the EA on page 18), the City will have to address some means of ensuring safe passage for children across Stower as well as Main. Miles City does not currently have bussing for the vast majority of children.

A response to comments related to impacts to the Highland Park School is provided in Appendix A, #41B part 2.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 19) Paragraph 2.** "The Highland Park Elementary School, bordered by Stower and Comstock, may experience the effect of less traffic driving in front of the school and more traffic driving along the back side of the school property, on the other side of a six-foot chainlink fence."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Schools. (Page 22) Paragraph 3.** "Secondly, the improved conditions of Stower Street and its new connection to Haynes may encourage local through traffic to use Stower rather than Comstock. The school actually faces Comstock, and school buses and other school-related traffic currently congregate on Comstock between Cale and Earling. Since this street is narrow and does not meet the width established by standards, this block is congested when school buses and parked cars are in the vicinity and room is often only available for one lane of through traffic."

## Response

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Schools. (Page 22) Paragraph 4.** "Stower Street borders the school property at the rear of the school, and a playground, bordered by a 6-foot high chainlink fence, separates the school building from Stower Street."

Apparently the same methodology as was used for the Access analysis (which erroneously indicated better routes being made available to MCC and the VA) was used here. The "front" of Highland Park School is on Cale (according to their legal address of 716 S. Cale) and the main office is most easily accessed through the door on Earling. Comstock contains the faculty parking lot, as well as the gym and janitor entrances which are normally not used by the children. Many of the parents park along Cale and Earling to drop off or pick up students. This is also the drop off and pick up area for those students that are bussed (a minority). A large number of parents also drop the children off on Stower at Cale, with the children proceeding to utilize the playground to make their way to school. This playground area is also frequented by children at many times of the day outside of normal school hours--whether for organized sports or simple activities such as kite flying. This is the end of the school where the safety issues are the greatest. The children frequently run into the street to retrieve balls which have strayed, not always observing the best traffic safety rules when they do so.

The six-foot chainlink fence was not designed to provide safety in a vehicular conflict as was well illustrated by the traffic accident on March 6, 2002 that removed a large portion of said fence. In addition, assuming the fence is not relocated as part of the project, an even lower margin of safety will be provided to the children on the playground since completion of the project would result in the roadway being even closer to this fence due to removal of the boulevard.

The fact that the currently busier street (Comstock) has the faculty parking lot was pointed out in the letter from Jack Regan dated May 16, 2002. He further points out that, from a safety perspective, the Stower end of the school with the playground is the "high traffic area for our children."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Schools. (Page 22) Paragraph 4.** "Most pedestrian traffic related to the school tends to use Comstock versus Stower Street." I do not have the statistics to support or discredit this statement; however, I have observed a large number of children (Highland Park School age and older) crossing Stower Street both on their way home from school and on their way to the playground after hours.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources.**

Correction related to school entrance is noted in the Addendum.

Comments from the school's staff are included in Appendix A.

## Response

Thank you for your comments.

Responses to comments related to safety have been included in Appendix A.

**Schools. (Page 20) Paragraph 2.** "Improved sidewalks and crosswalks would be provided along Stower Street under the proposed project. This, coupled with the widened travel lanes, would improve sight of and clear zones for pedestrians traveling along Stower Street." As indicated earlier, the mere existence of a crosswalk does not mean that safety is provided. The infamous traveling public must be convinced in some manner (such as legal enforcement) that crosswalks are to be respected. Also, the wider roadway will provide the temptation for higher rates of speed which translate into greater stopping distances. Children are not necessarily equipped to accurately evaluate speed and stopping distances. Of course, if all of the children could be convinced to simply walk up and down the sidewalks on Stower, the issue of how to get across the street (which most of them seem to find necessary) would not arise.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources.**

**Schools. (Page 22) Paragraph 4.** "Therefore, the Stower Street improvements may serve to reduce the chance of vehicular-pedestrian conflicts on Comstock Street." True; however, the probability is that the "improvements" will increase the chance of such conflicts on Stower.

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Safety. (Page 6) Paragraph 4.** This paragraph describes the enhanced safety achieved by adding curbs and gutters. Stower currently has both of these features. Another case of misleading information by combining the analysis for all three projects. The paragraph also indicates improved signing and pavement markings. For Stower, it may not be an improvement since MDT has indicated that once the 15 mph speed limit signs are removed, they will not be reinstalled since state code provides for a 25 mph speed limit unless there is a city ordinance (which Miles City does not have). This issue was presented at the public meeting on February 28, 2002, in correspondence, and by MDT at the City Council meeting on May 28, 2002. In addition, it is my understanding that Jack Regan discussed the matter with Ruben Oberlander and was assured that an ordinance would be adopted if none existed. To date, I am not aware of such an ordinance being enacted.

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Mitigation. (Page 20)** There is no need for mitigation if the project is not completed. It is difficult to lend much credence to the City's consideration ("considering" doesn't mean "will do") of the "use of speed control measures or installing speed zones" when they have failed to adopt an ordinance to legitimize the currently posted 15 mph zone as required by Montana Code 61-8-310 (an issue they have been aware of for over a year and assured the Superintendent of Public Schools they would address). Further, the indication is that the "City has no plans to consider promoting Stower Street as a freight truck route"; however, it

provides no indication that any actions will be taken to prevent this from happening. In addition, the table on page 25 of the EA indicates that "12 Heavy Trucks" are anticipated every hour for the design year. Why would these "Heavy Trucks" (not defined) be included in the noise analysis if their presence was not anticipated? Most importantly, all of the ordinances in the world serve no purpose unless they are enforced.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. USDoT Section 4F. (Page 30) Paragraph 3.** "Although there is a school playground along Stower Street, the proposed project would not use or impact this recreational facility." It certainly brings the traffic hazard closer as well as making access more difficult unless all drivers suddenly begin to honor the pedestrian right-of-way. In addition, if "designated parking" for the church is delineated along the Stower end of the playground as indicated in **3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Churches/Synagogues (Page 22) Paragraph 1.,** there will be minimized parking available for use during organized sporting practices and events on the field.

#### **CHURCH**

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Impacts. (Page 19) Paragraph 2.** "The First Lutheran Church, of which the side is adjacent to Stower Street, would also experience the increased traffic volumes along Stower." Sort of forgetting to detail the disruptive effects of noise on the conduct of services, as well as all of the other inconveniences (such as being able to pull away from the curb into traffic after services).

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Churches/Synagogues (Page 22) Paragraph 1.** "Members of the Church have expressed their concern regarding safety for their pedestrians under the Stower proposed project, similar to those concerns expressed by school parents. As mentioned previously, pedestrian safety would improve with the Build Alternatives due to the widened lanes and shoulders, which would allow drivers to see pedestrians easier." Sight distance is not really the issue. The issue is that current traffic frequently does not honor the right of way for the crosswalks. The potential for higher speeds with the wider roadways (acknowledging that the traveling public frequently has a difficult time observing posted limits) increases the hazards for these pedestrians as well. The fact that a driver sees a pedestrian is not an assurance that the driver will stop for that pedestrian.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Churches/Synagogues (Page 22) Paragraph 1.** "A new sidewalk provided along the south side of the street and a crosswalk in the

## **Response**

Thank you for your comments.

Thank you for your comments.

vicinity would also improve the conditions for church visitors." There is only approximately one-fourth block along the south side where church attendees normally park that does not have a sidewalk, although the sidewalk for the other fourth of that same block is set off due to the boulevard. The majority of the church attendees that are parking other than along the church park along Cale (in front of the church) or on the north side of Stower (both of which currently have sidewalks that are attached to the curb). There are currently two "designated" (painted) crosswalks at the intersection. The increase to four (presumed intent) will not necessarily increase the honoring of pedestrian right-of-way by drivers.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Churches/Synagogues (Page 22) Paragraph 1.** "Formalized on-street parking would be available for church visitors along both sides of the street--another improvement over existing conditions." The current parking is, admittedly, not "formalized"; however, I have failed to note any difficulties for visitors parking in "informal" on-street parking (which is the norm within the city). The additional issue arises regarding whether it is appropriate to designate as "formalized church parking" the portion of Stower which runs alongside the school playground and which is frequently utilized by parents for school sporting activities. I have not noted any conflicts over the parking spaces by these two groups since they tend to use these "informal" parking areas at different times.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Churches/Synagogues (Page 22) Paragraph 2.** "Currently, when a funeral is occurring, the hearse parks on Stower and backs up to the side doors, thereby blocking the existing sidewalk. The proposed project could provide a parking location adjacent to the church for the hearse to park, which would eliminate the current safety problem." In reality, the hearse does not block the "walking" portion of the sidewalk, merely the sidewalk in the area of the side entrance. The majority of people attending funerals have been observed to enter through the front door, rather than through this side entrance.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Churches/Synagogues (Page 22) Paragraph 2.** "No formal handicapped parking is provided in front of the church. The proposed project could include the provision of formal handicapped parking spaces." The church currently has four formal handicapped parking spaces--one along the curb on the Stower side and three in the parking lot at the rear of the church. While the "front" of the church has no formal handicapped parking, that is on Cale and, hence, is outside of the project limits (the project being on Stower). It is my understanding that the project could be expanded to include this work under incidental construction;

## Response

Thank you for your comments. Your comments have been incorporated into the Addendum.

however, the question of most importance is not "Can it be done?", but rather, "Does it need to be done?".

## **FIELD**

**2.0 Alternatives. 2.2 NO BUILD ALTERNATIVES. Stower Street. (Page 12)** This paragraph accurately indicates the "vacant pasture," but fails to indicate that the pasture is used as grazing for two horses. In addition, the land has provided a buffer zone to the neighborhood from traffic and noise.

**2.0 Alternatives. 2.3 BUILD ALTERNATIVES. Stower Street. (Page 14) Paragraph 4.** "Acquisition of new right-of-way would be required for this middle section."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Right-of-Way and Relocations. Mitigation. (Page 25)** "During the process of final design, if the proposed projects proceed, specific right-of-way needs would be identified and individual landowners contacted."

The acquisition of right-of-way was not included in the draft 2003-2005 STIP (although it was in the 2002-2004 final STIP). I discussed the matter with Jeff Ebert, MDT in Helena (telephone and E-mail). After a considerable delay and repeated requests, I was informed that it should have been included and would be in the final STIP (E-mail dated August 20, 2002). It is not. Considering the conversation I had with MDT in Helena regarding normal "debt" levels approved by the Transportation Board for Urban Funds, I have to wonder if this omission is intentional.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Land Use (Page 23) Paragraph 3.** "The future uses of the urban agricultural parcel, if Stower Street is extended through, would depend on the next owner and possibly require rezoning." "Urban agricultural"? Bit of an oxymoron. Is there some assurance that the current owner will be transferring ownership within the near future? Presumably, all real property could be contemplated in terms of the "next owner" given a long enough time frame; however, that is not the normal analysis used.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Land Use. Impacts. (Page 24)** "The Stower Street proposed project would affect the vacant parcel of agricultural land, located between Sewell and Moorehead Avenues, as it would divide the parcel and make it accessible by traffic. It would ultimately be the decision of the individual property owner and the City Planning Board as to how the two new parcels (bisected by Stower Street) would be developed." The parcel is still "vacant," but now it's only "agricultural" (instead of "urban agricultural"). To phrase this in a more straightforward manner, one would expect something along

## **Response**

The vacant field and its uses are addressed under the Land Use section of the EA. Please see the discussion of farmlands in the Addendum.



## Response

Information on the development status of the vacant property was provided for the EA from the Miles City Planner.

the lines of, "The proposed project will remove the agricultural land from its current agricultural use since it would divide the parcel and make it accessible by traffic." Seems like a considerable impact that might deserve more than the given two sentences (one kissing it good-bye and the other saying the City Planning Board would be most helpful in finding it a new purpose in life). What if there is a desire to retain the status quo?

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Land Use (Page 23) Paragraph 3.** "The current landowner of this parcel is considering selling his property." Would be interesting to know if this "current landowner" is Mr. Kosty or the infamous "Mr. Koski" repeatedly referred to in MDT correspondence. Perhaps they are receiving their information from an impostor since most people are able to correctly spell the name of individuals they have been dealing with.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Local and Regional Economics. Impacts. (Page 27) Paragraph 4.** "Also, the commercial viability of the vacant parcel between Sewell and Moorehead Avenues may be enhanced by the Stower Street proposed project. The eastern half of this parcel is adjacent to other commercial properties. The addition of infrastructure enhancements to the vacant parcel (not covered by City funds) may make it more viable from a commercial standpoint, and therefore potentially more desirable to developers. Turning a portion of the vacant parcel into commercial development would provide the opportunity of increased tax revenues for the City." Now, the property is no longer agricultural--it's simply a "vacant parcel." What ever happened to freedom of choice for the property owner? Perhaps that is outweighed by the City's desire for increased tax revenues.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Land Use (Page 23) Paragraph 3.** "Commercial or institutional uses, such as Miles Community College, may be interested in purchasing the property." Interested does not always translate into capable. Additional analysis may also need to be done on the project if it is anticipated that MCC might purchase the property. As pointed out earlier in the EA, the MCC students are not capable of dealing with the traffic on Dickinson without conflict. It should be anticipated that they would have even greater difficulties dealing with the even greater amount of traffic which this project is projected to provide on Stower.

### SECONDARY/CUMULATIVE IMPACTS

**3.0 Impacts. 3.4 SECONDARY AND CUMULATIVE IMPACTS. (Page 37)** "No other City or MDT projects have been identified as occurring within the vicinity of the three proposed projects." The concept

of secondary and cumulative impacts also involves the other areas which may be impacted by this project (such as Stower/Eighth to downtown and Cale/Winchester). The large amount of additional traffic projected for Stower is highly unlikely to simply vanish upon reaching Strevell. It has to go somewhere from there and would be anticipated to cause an impact on that destination, as well. In addition, they must have failed to read the appendices regarding the eventual plans for Stower and Eighth (reference the December 15, 1988 City County Planning Board minutes, the March 2002 letter from George Luther, and John Mark's January 8, 1999 letter) or they would have been aware that that route is a predicted destination route. Although this is not a "current" project, it is anticipated (and should well be expected considering the predicted increase in traffic volume). This was the reason the EA should have been extended through that area to the logical end termini (avoiding segmentation). At the May 28, 2002 City Council meeting, MDT made assurances that this area would be considered in evaluating impacts. I was unable to locate any evidence of this consideration in the EA. In addition, the rerouting of traffic would reasonably be expected to impact Wibaux Park, as well as the entire portion of Cale/Winchester from Stower to Main (as indicated in the access sections of the EA). As such, under FHWA guidelines, that impact must be evaluated.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Community Resources. Parks or Recreational Facilities (Page 23)** "Wibaux Park, on Strevell Avenue, is located three blocks to the north of the proposed Stower and Strevell projects. . . the proposed projects are not anticipated to have any effects on either Wibaux Park or the Town & Country Golf Course."

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. USDoT Section 4f. (Page 30) Paragraph 3.** ""The proposed projects would not use or impact the Wibaux Park . . ."

Wibaux park also borders on Cale/Winchester directly across from the VA facility. If additional traffic is routed from Stower along Cale/Winchester for the VA (or MCC), Wibaux Park and the children walking or riding bicycles to that park may be adversely affected.

**3.0 Impacts. 3.2 EFFECTS ON THE COMMUNITY. Cultural/Archaeological/Historical Resources. (Page 29) Paragraph 2.** The cultural resource survey ended at Strevell (rather than going on down Stower through Eighth). Per discussion with Jon Axline (the historian for MDT doing this survey) on April 17, 2002, had he known that the eventual plan was to extend the project that far, he certainly would have taken the cultural resource survey all the way down. There are additional properties in the section of Stower/Eighth from Strevell to the downtown area which would be anticipated to also qualify as historic resources

## Response

Traffic projections and impacts associated with the proposed Stower Street project west of Strevell have been addressed in the Addendum since the public hearing.

The proposed projects are anticipated to have minor, if any, increase on traffic volumes on the streets adjacent to Wibaux Park. Therefore, visitors to Wibaux Park would not be affected.

Extension of Stower Street to the west of Strevell is **not** a project in the foreseeable future, to MDT's knowledge, and therefore direct impacts in this section were not evaluated in the EA

and therefore deserve consideration.

#### **PUBLIC INVOLVEMENT**

**3.0 Impacts. 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM. Access and Traffic. Traffic data. (Page 18) Paragraph 7.** "As stated earlier, the rerouting of traffic patterns has been a longstanding City goal in order to improve traffic circulation, as noted in the transportation plans of City staff, Planning Board and City Council and has been communicated to the public on several occasions, as is documented in Appendix A." For reference, Webster defines "several" as "consisting of more than two, but not many; few." Appendix A may document "communication" to the public, but it fails to include the important factor that the public is frequently informed after the fact--not being given the opportunity for input at decision making time. According to the documentation provided in Appendix A, the initial plans of the City were formulated in 1984, yet the "general public" was not given the opportunity for input until 1998--14 years later! This is not the way the public involvement process is supposed to work. FHWA's guidance included in **Community Impact Assessment** specifically indicates that affected neighborhoods are to be involved as detailed in **FHWA's Environmental Policy Statement (1994)** (page 6), as well as indicating that "public participation" can be facilitated by "clear information and timely public notice" (page 34). In addition, this publication indicates that, "Communities are dynamic and constantly changing. As options change, the analyst must make appropriate re-evaluations and adjustments in findings, particularly if there are substantial time lapses in project development." (page 11). As Walter Kulash indicates in **Residential Streets**, recent trends in urban roadway designs have realized that wider is not always better and that traffic in residential areas should be kept to a minimum. (The third edition of **Residential Streets** referenced here was developed by the National Association of Home Builders, The American Society of Civil Engineers, the Institute of Transportation Engineers, and the Urban Land Institute.) Perhaps the plans for this project should have been revised in light of this guidance, as well as giving greater acknowledgment to the neighborhood affected as recommended by FHWA.

**4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41) Paragraph 2.** "the City has kept the public informed over the last five years regarding their goal and plans to recirculate and mitigate traffic." According to the page 4 of EA, plans have been being developed since 1984--a total of 19 years. Why has the public only been informed for the last five? **Community Impact Assessment** (FHWA Publication No. FHWA-PD-96-036) indicates that a community impact assessment is legally required under a wide variety of major Federal regulations (page 6). There is no

## **Response**

You are correct that FHWA requests public participation throughout the environmental documentation process. This is why MDT held a public meeting in 2002, the public hearing in April 2003 and a follow-up meeting on the Stower Street proposed project on August 19, 2003.

Before MDT initiated the environmental documentation process in Fall of 2001, the City was responsible for notifying the public of meetings regarding planning for future projects. The City has stated that the three proposed projects were discussed at several planning commission and city council meetings that were open to the public.

## Response

Thank you for your comments on this page.

indication that this assessment was done--although perhaps it happened during the 14 years before informing the public. The small technicality being, of course, that the public is supposed to be involved in that process. There is also some question as to the definition of "informed" used here. The City Council meeting (included in the appendix as one example of "informed") on May 28, 2002 was held with virtually no notice to the public of the intent to discuss the projects (our newspaper with the information arrived less than an hour prior to the meeting). This probably would not be considered adequate under FHWA's guidance of "timely public notice." As another example, one couple did check with the City regarding the intents for this project prior to purchasing their home on Stower (within the project limits). They were told that the road would be widened about a foot, not even requiring utilities to be moved. This information was provided AFTER the public meeting by one of the City employees present at that meeting. They relied on this information in making their decision regarding purchasing the home. Not exactly an accurate presentation or "informing" of the public and this couple will bear the loss when property values decrease because of the road widening.

**1.0 Purpose and Need. 1.4 NEED FOR PROPOSED PROJECTS Improving Travel Movements. (Page 4)** This paragraph discusses the goals and traffic plans being discussed at past City Council meetings and other public meetings dating back to 1984. It should be noted that the section of Stower Street from Strevell to Haynes was not added to the urban system until March 24, 1999. Prior to that time, Comstock Street had the urban designation. Under the general guidelines for an urban corridor, it is very unlikely that Stower from Strevell to Haynes could have met the definition at the time it was thusly designated (needing to be a main collector route, main arterial, high traffic, etc.--all of which are rather difficult tasks for a dead end street). In addition, it should be noted that, to date, the city still does not treat this portion of Stower as being part of the "urban corridor" when it comes to snow removal. Stower Street is plowed from Eighth to Strevell. This is true even though Highland Park School is supposed to be on the priority list for snow clearing. For the last major snowstorm, I personally had to call the city to report that the street had not been plowed around the school (much less the segment down Stower to Strevell) for several days and was resulting in a safety hazard for children and other pedestrians (snowfall occurring on Thursday and Friday and plowing finally being accomplished the middle of the following week).

**2.0 Alternatives. 2.1 DEVELOPMENT OF ALTERNATIVES. (Page 11) Paragraph 1.** This paragraph indicates "several public meetings" as "documented in Appendix A." I noted two. For reference, Webster defines "several" as "consisting of more than two, but not many; few." The City Council meetings can hardly be counted since

## Response

Thank you for your comments on this page.

there is virtually no notice provided to the public regarding items to be discussed and the agenda is frequently not available on a timely basis (although a resolution 2934 indicated in would be posted at City Hall as well on their website--the only problem being that they didn't have a website). Our newspaper arrived shortly after 6:00 on May 28, 2002 and it carried the information about the 7:00 meeting--not much notice to the public in my opinion. In addition, the public comments were not particularly encouraged at that meeting. This project has not been a stellar example of involvement by the general public--comments are only welcome if you say what they want you to.

#### 4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41)

Paragraph 3. Interesting to note a couple of items with regard to discussion of the public meeting (termed open house here) held on February 28, 2002. The paragraph indicates that the comments provided assisted MDT in making "refinements" to the alternatives for the "Wilson and Strevell proposed projects." The discussion of the Stower project was much more impassioned and included many concerns this EA shows were valid. Why weren't any of those comments deemed to be appropriate for use in making refinements to this proposed project? It is also interesting to note that the transcript provided by MDT is not identical to that compiled by a court recorder. One should have assumed they would be alike.

#### 4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41)

Paragraph 4. "During and since that public meeting, the city and MDT have received over 100 written comments. These comments, written on comment forms and on personal stationery, are on file with MDT." I had my mother go to the MDT District Office in Glendive to request copies of all of these documents. A large number of documents WERE provided; however, not all were included despite repeated requests (Rick Newby's written comments were missing, for example). My mother was told that the volume of documents was too great to locate the remaining documents she did not have. There is no way to accurately determine exactly what was not provided unless MDT's files are examined piece by piece.

#### 4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41)

##### Paragraph 5.

"To summarize, a large portion of the written comments support the proposed projects. They often cited the following reasons that the projects should be constructed:

- Supports benefits to downtown and economic development
- Need better connection to downtown; eliminates maze
- Improves traffic flow; would help bring two sides of town together

Helps with congestion; Balances out traffic on other roads  
Increases safety  
Likes sidewalks  
Reduces traffic on Comstock (in front of elementary school)  
Helps direct traffic away from school; improves safety at school  
Improves emergency response time  
Benefits the Community College  
Helps pedestrians near Health Care complex  
Was in original plans and supported by Planning Board and City Council"

## Response

Thank you for your comments on this page.

In fairness I must note that, since MDT was unable to provide copies of all of the comments they received, my commentary is limited to considering the copies I did receive. The majority of my comments, of course, have appeared throughout this summary. Below are some that seem to have particular relevance for the listing in this paragraph.

I found it interesting to note that the letter from John Riggs used his business address for the letter, but not the business name--in other words, it was a personal letter. Did he really believe that people didn't know he lived on Main Street and perhaps had an interest in reducing traffic in front of his own home?

I must give credit, however, to the majority of the people submitting comments in favor of the plan based upon it moving traffic away from other streets. They were very honest that they didn't like all of the traffic (including the noise) that went by their homes and wanted it to be routed elsewhere. They did use their home addresses on the letters.

As noted in the access section, although "economic development" supports the project due to the access it would provide to the VA and MCC, that additional access is not provided since Stower is parallel to Dickinson and Sewell is a one-way street going in the opposite direction.

I remain amused that a maximum differential of 4 city blocks distance should be of such concern (need for a better

connection). The fact that it is not a straight shot on a wide road has provided a higher safety margin due to the reduced speeds required for turning.

As discussed at length in the **SCHOOL** section, Comstock is not the front of the school, nor do the majority of children enter there. There were several letters, however, that did not seem to realize the correct geography of the school building. It was particularly interesting that the EA did not reflect the information provided in Jack Regan's letter. One would expect that the Superintendent would be very familiar with the situation at a given school and that his information would have been included.

It should be noted that several of the comments in favor of Stower added in the contingencies of if the existing 15 mph speed limit were maintained and/or stop signs or traffic signals installed at Earling and/or Cale. Since neither of these safeguards seems to be assured, one must question whether these letters should be included among those endorsing the project.

As evidenced by the lengthy fiasco this town went through (and still is, to some extent) regarding the disposition of the City parks, the decisions of the City Council do not always reflect the desires of the population at large.

It is very interesting to note that the comment made several times about the need to build the projects prior to losing the federal funding was not included here. Perhaps that is due to the fact that that was misleading information which was provided to the public. I make this statement with confidence because this is what Ray Mengel of MDT informed me. Unfortunately, I am an accountant and recomputed the financial data based upon available information. Even if the Stower project is not completed, the other two projects more than use up the current and accumulated Urban funds. In addition, if the Stower project is not completed, the community will not go excessively into "debt" for this category of funding and would have funds available sooner for other projects that may be desired (for example, a traffic light at Strevell and Main).

**4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41)  
Paragraph 6.**

"Others, predominantly residents living adjacent to the Stower Street proposed project, expressed opposition to the project. Those who oppose the projects often listed the following concerns:

- concerned about safety of elementary school students
- concerned about speeding cars

## Response

Thank you for your comments on this page.

projects would increase traffic  
projects would diminish adjacent property values  
noise would increase  
didn't want to lose trees  
don't want or need more development"

As noted above, my commentary is limited to considering the copies of letters I did receive from MDT. The items detailed below are some that seem to have particular relevance for the listing in this paragraph.

It is difficult to do an adequate assessment of the safety issues regarding the elementary school students when your evaluation is based upon one or more faulty premises (such as errors regarding the actual entrances used by the children as well as the normal pickup/drop off streets, the possibility of error regarding amount of bussing of children since most communities do have a greater degree of school bus service in existence, lack of awareness of pedestrian and bicycling patterns of these children, etc.)

As noted in the SCHOOL section, the Highland Park School students will not be the only children affected by the road construction. This impact has not been fully disclosed to the public (since the EA says it doesn't exist).

The increase in traffic and noise should be anticipated to be even greater than indicated in the EA since the ADTs used for their analysis were based upon counts from a more heavily traveled portion of Stower.

The concerns regarding the diminishing of adjacent property values was not addressed at all.

I was surprised to see the EA indicate that the public input received was used to modify the other two projects, but not Stower. I commend the honesty of this presentation--even if it is not the "reality" of what is supposed to happen under the concept of public involvement in the decisionmaking process.

Basically, it seems that the EA acknowledged the concerns submitted regarding Stower (at least to some extent), but provided no practical resolution or mitigation. In addition, there are a number of factual errors (entrances to Highland Park, speed limit, ADT, current traffic not including "large"

## Response

Public comments related to the Stower Street proposed project have also been taken into consideration, similar to the other two proposed projects. For example, the conceptual design has been revised regarding the location of the sidewalk on the north side of the street in the western portion of the project, at the request of Stower Street residents.



trucks on a regular basis, one-way street status of Sewell, indicating no other projects planned yet including information regarding intent of construction on Stower from Strevell to Eighth in the Appendices), the failure to extend the EA to the logical end termini (as required by FHWA to avoid segmentation when a project is part of a larger whole), and the failure to adequately consider the secondary and cumulative impacts (such as on traffic on the remaining part of Stower including children trying to cross in that area and the impacts on Cale/Winchester if additional traffic is routed via that street). In short, I was dismayed by the quality (or lack thereof) of this Environmental Assessment.

**4.0 Comments and Coordination. 4.3 PUBLIC INVOLVEMENT. (Page 41)  
Paragraph 7.**

"An additional opportunity was provided for public discussion of the proposed projects. A discussion was held during the City Council meeting on May 28, 2002, and the public was invited to attend. At that meeting, the design details of the three proposed projects were presented. The City Council approved the three projects, although some public attendees voiced opposition to the Stower Street proposed project." There is, still, the issue of the lack of notice of this "additional opportunity" for public discussion. In addition, as an attendee at the meeting, I seem to recall that my input and questions were not particularly encouraged. There seemed to be more of a desire to hurry the process up so it could be said that it was done (never mind how well). I also don't recall which public attendees voiced anything other than opposition regarding the Stower project. In fact, the minutes don't indicate any positive comments about the project by the public attendees (simply that they were voicing concerns or questions).

**ADDENDUM COMMENT TO EA SUMMARY**

April 8, 2003

The access information should also indicate that Earling is another existing route to Dickinson (and the college and VA). This would not change with the Stower Street project. The EA (for whatever reason) doesn't discuss Earling as access--suspect because it hits midway on the VA instead of the front of the VA (Cale/Winchester) or directly to MCC (Sewell although going the wrong direction and Moorehead). My apologies for the oversight.

## Response

Thank you for your comment. Additional opportunities for public comments were provided at the public hearing and at the follow-up meeting with Stower Street residents held on August 19, 2003.

## **Appendix C:**

Notice of Public Hearing:

Copy of Newspaper Announcement posted in the Miles City Star

**NOTICE OF AVAILABILITY**  
**Miles City Urban Projects Environmental Assessment (EA)**  
STPU 8013 (1), STPU 8006 (1), STPU 8009 (2)  
**PUBLIC HEARING**

A Public Hearing will be held to provide information and take public comments on the EA addressing the proposed improvements for Strevell, Stower and Wilson Streets. The EA and the preliminary design plans for the project will be available for review. The Public Hearing will be held:

**Tuesday, April 15, 2003**  
**VA Building Auditorium**  
**Nursing Home Care Unit Entrance (Adjacent to MCC)**  
**Miles City, MT**  
**7:00 pm**

The Federal Highway Administration (FHWA) and the Montana Department of Transportation (MDT) invite interested individuals, organizations, and federal, state, and local agencies to review the EA and provide comments.

**Viewing Locations**

Copies of the EA will be available for public review beginning April 4, 2003 at the following locations:

- ◆ Miles City Library, One Tenth Street (Main & Tenth)
- ◆ Miles City Engineering Office, 17 South Eighth Street
- ◆ MDT Miles City Office, 217 N Fourth Street
- ◆ MDT Glendive District Office, 502 N River Avenue, Glendive
- ◆ MDT Environmental Services Office, 2701 Prospect Avenue, Helena
- ◆ Custer County Offices, 1010 Main Street, Miles City

A copy of this document may be purchased at H & T Printing for the cost of approximately ten dollars. H & T Printing is located at 10 North Eighth Street in Miles City.

**How to Comment**

A 30-day calendar-day review period will begin on April 4, 2003, and conclude on May 5, 2003. Verbal or written comments may be presented at the Public Hearing. Written comments on the EA may also be addressed to: Jean Riley, MDT Environmental Services, 2701 Prospect Avenue, PO Box 201001, Helena, MT 59620-1001, Fax (406) 444-7245, or jriley@state.mt.us **by May 5, 2003.**

**For further information contact:** Bill McChesney, District Administrator, 503 N River Ave, PO Box 890, Glendive, MT 59330-0890, phone (406) 377-5296 or (888) 689-5296. To arrange special accommodations for persons with disabilities, call MDT at (406) 377-5296 or TTY (800) 335-7592 by April 11th.



## **Appendix D:**

Transcript of Public Hearing held on April 15, 2003 and  
List of Issues raised during Public Hearing and Responses

(Issues that were raised and unresolved during the Public Hearing  
are highlighted in the Transcript and discussed in the following List of  
Issues)

## **Key Issues Raised during Public Hearing and Responses**

**Issue:** Would like bike lanes included as part of the proposed projects.

**Response:** The City-owned right of way is not wide enough to allow bike lanes in the conceptual design of the proposed projects.

**Issue:** Questions why sidewalks were reduced to be on only one side of the street for the Wilson and Strevell projects. If it was at the request of adjacent property owners, then why aren't the requests of Stower Street residents not taken into consideration? Wants more information on covenants that prohibit sidewalks along Strevell.

**Response:** The City and MDT held a meeting with Stower Street residents to discuss design mitigation treatments on August 19, 2003. Subsequently, MDT and FHWA selected the No-Build Alternative for the Stower Street project. This issue was discussed by MDT Glendive District staff, but was not pursued further because residents at the February 2002 public meeting indicated that they wanted the sidewalk on the east side only. MDT revised the proposed alternative to include sidewalks only on the east side, so this issue was no longer relevant.

**Issue:** Concerned whether parking would be legal on Strevell.

**Response:** Parking regulations are a function of the City. The City has indicated that parking will be legal on both sides of this facility.

**Issue:** Concerned whether access would be provided to Subway store business during construction of Wilson Street project.

**Response:** MDT will work with property owners to ensure access is provided during construction.

**Issue:** Questions why sidewalks are not on both sides of Wilson. Thinks sidewalks are needed on both sides as streets in Miles City don't have enough sidewalks.

**Response:** The City and MDT worked with Strevell and Wilson residents and city staff and incorporated their suggested revisions into the conceptual plans for sidewalks on only one side of the street.

**Issue:** Why didn't the EA include traffic projections along Stower, west of Strevell?

**Response:** MDT has expanded the traffic projection area to include the area west of Strevell, and the traffic section in the EA has been modified.

**Issue:** Doesn't believe that wider streets are considered to be safer than narrow streets.

**Response:** Design treatments can enable wider streets to be as safe as narrow streets.

**Issue:** Concerned about the decrease in values of adjacent residential properties.

**Response:** Property value impacts evaluation is now included in revised EA (see Section 4, Clarifications to the Environmental Assessment).

**Issue:** Why can't those most affected by the projects (the adjacent property owners) make the decision about the outcome of the proposed projects? Who makes the decisions about the ultimate outcome?

**Response:** Input from the adjacent property owners has been considered throughout the conceptual design process. The Miles City Council, MDT and FHWA are the ultimate decision-makers on the implementation of the proposed projects.

**Issue:** Why can't the No-Build option be selected?

**Response:** The No-Build Alternative for the Stower Street project has now been selected.

**Issue:** The entrance of the elementary school is incorrectly noted in the EA.

**Response:** It has been corrected in Section 4, Clarifications to the Environmental Assessment.

**Issue:** Doesn't think the proposed projects would improve access to the VA.

**Response:** Comment noted.

**Issue:** Thinks traffic would still be a problem along Comstock in the vicinity of the school, even after the proposed projects are completed.

**Response:** Comment noted. The traffic projections produced by MDT indicate that the Stower Street project would result in reduced traffic volumes along Comstock.

**Issue:** Concerned about the presence of standing water in the proposed retention ponds and the possibility for West Nile Virus.

**Response:** The proposed retention ponds are not intended to hold standing water on a continual basis.

**Issue:** Several people expressed their concern that the proposed Stower Street project would result in heavy commercial truck traffic using Stower Street.

**Response:** The No-Build Alternative has now been selected for the Stower Street project.

**Issue:** Concerned about impacts to local businesses.

**Response:** The impacts are projected to be short-term in nature. MDT and the City would work with business owners to ensure their access during construction.

**Issue:** Pedestrian amenities are important. Need to make it easier to cross the wider streets.

**Response:** Comment noted. The No-Build Alternative has now been selected for the Stower Street project, so the width of that street will not change.

**Issue:** Thinks the proposed project will change the character of Stower Street to become like Main street.

**Response:** Comment noted. MDT and the City have been meeting with adjacent property owners to discuss mitigation treatments that may be incorporated in the conceptual plans for the proposed projects. The No-Build Alternative has now been selected for the Stower Street project, so the character of that street will not change.

**Issue:** Questions the description of noise impacts in the EA.

**Response:** They have been reexamined since the public hearing and are provided in Section 4, Clarifications to the Environmental Assessment.

**Issue:** The EA needs to include more analysis of impacts beyond the study area.

**Response:** Revisions to the EA are noted in Section 4, Clarifications to the Environmental Assessment and are described in the cumulative impacts section.

**Issue:** Doesn't think the City has taken an active approach to notifying the public about the proposed projects. Doesn't think a plan was presented by the City at prior meetings.

**Response:** The proposed projects, including the Stower Street project, have been discussed at past City Council meetings and Planning Commission meetings. The purpose of the EA public comment period and the public hearing is to solicit public feedback. The City offered to host another meeting for Stower Street property owners, which occurred on August 19, 2003.

**MILES CITY ENVIRONMENTAL ASSESSMENT  
PUBLIC HEARING**

**VA Auditorium  
Miles City, MT  
April 15, 2003**

**WELCOME**

Joan Scott. I would like to welcome everybody to the hearing of the Draft Environmental Assessment of three projects in the area: Strevell Street, Wilson Street, and Stower. My name is Joan Scott; I'm Public Involvement Specialist with the Department of Transportation from Helena. Also here tonight from Helena we have Jake Goettle, our Environmental Project Manager and Jim Davis, our Road Design Area Engineer. From the Glendive District we have Bill McChesney, the District Administrator, Ray Mengel the Engineering Services Supervisor, and we have Gary Lundman, the Design Supervisor. From Denver, we have Kristin Kenyon who is the Environmental Planner for David Evans and Associates. They are the company who did the Environmental Assessment. We also have Pat Rogers from Miles City, he is the Public Works Director, and I noticed a number of City Council Members signed in. I'm not sure if the Mayor is here.

The structure of the meeting tonight: we will open with a presentation from Ray Mengel. He will open with Strevell Street, and after his presentation we will take comment on Strevell Street. We will then move on to Wilson Street, comments and questions will be taken at that time, and we will finish with Stower. We would like all comments made after each area is presented. That will keep the meeting flowing much smoother and not try and remember which street people are referring to later. So when we move into the next project, if you have further comments about what we just talked about, we would appreciate it if you would fill out a comments form. They are at the rear of the room and also were handed out when you came in. With that, I will turn it over to Ray to make the first presentation.

**PRESENTATION**

Ray Mengel: This evening I'm not going to go back through a lot of the information we presented at the last public meeting because it is kind of redundant and a lot of you have heard all of that already. Also it is part of a written record that we make available to you. So I'm not going to go back through the funding and that kind of stuff. We will deal just strictly with the design of projects because the intent for us to be here this evening is to get feedback from you and we don't want to use up our time going over some of the same information you may have heard already. If you haven't heard it, feel free to ask the questions. We want to focus mostly on the design elements of the projects here this evening. Another thing I would like to say is that the Montana Department of Transportation is here to provide a service to the City of Miles City



for these projects. This is a City of Miles City project. They've asked us to be the agency that develops the project for them. It is federal aide and state monies that are involved but it really is the City's project. They could have brought on a consultant to develop the project but they chose to use the services of MDT and not use up the money in consultant fees. I want to emphasize again that the project really is for the City of Miles City.

Two things I would like to point out before we go into each specific project is that all of these projects will have new pavement markings, all of the existing accesses of how you access the streets now will be perpetuated, you will get new curb cuts and curb lay downs, there will be new siding installed in all three projects. One of the down sides is, depending upon the width of the street, there may be some impacts to flower gardens, rock gardens, fences, trees, and those types of things. We are trying to minimize that but there will still going be some impact there. All the intersections will be upgraded to new ADA handicapped accessibility. As we go through each project, I'll try and explain the areas where we are going to have new right-of-way take.

#### **PRESENTATION ON STREVELL AVENUE.**

Ray Mengel: That is the one in red here on the aerial photo. This project starts down in the area of the curve towards the interstate and then continues to the north up to the intersections of Wilson. The City and the County, more City than County, prioritized the projects. Wilson is the number one priority; Stower is number two, and Strevell is number three. The funding that is available for these projects; if there is not enough money to do all three, the Strevell project will be dropped. That is the priority listing. Since this is the easiest one, we thought we would start with this and leave the one with the most comments for the last.

Proposed Design: On Strevell we are going to resurface the existing roadway and widen it out on the east side. I've got some conceptual drawings over here for anyone who would like to look at them later. We are going to have two 12-foot driving lanes, we will install new curb and gutter on the east side as well as a sidewalk, and move that little V-ditch out further toward the hospital side. All drainage will drain to the intersection of Wilson. It will enter the culvert here (referring to graphic) and then go into the outdoor line that goes to the golf course. Initially right here where the parking lot is on Strevell, this is where the existing public right-of-way narrows up. In this area there is a row of trees, we will have to acquire a little sliver of right-of-way for that drainage ditch. In fact the new drainage ditch won't even get out to the trees. The trees there will be saved and won't have to be relocated or eliminated. So we will have to buy a little sliver of right-of-way right through this area here (referring to graphic). Back in this area (referring to graphic) we can fit everything into the existing public right-of-way.

Sidewalks: No sidewalk on the west side because it is our understanding from the public comments you did not want any sidewalk there. The sidewalk will start down here at Balsam Street, that way people can walk along here and if they want to go into the subdivision they can walk to the west down Balsam Street. So the curb, gutter, and sidewalk will end at this location here (referring to graphic). At this location there is an out draw that goes to the drainage and the

curb and gutter that goes out to the west to the Balsam Lake. We are going to put another drain-line on the east side and dump the water from the curb and gutter on the east side into that drain ditch that we are building there. So that is basically the concept for the design of Strevell. With that we can open it up for comments on Strevell.

Joan Scott: We ask that you preface all comments with your name so we know who is making the comment. I will come around with a microphone to whoever wants to make a comment, put your hand up so you can talk into the mic. We need you to talk into the microphone so that it can be taped. Please do not talk over each other so we can get an accurate record of what is being said. Everyone's comments are important and we would like to get them all.

### QUESTIONS/COMMENTS

Q: (Unidentified) This is not a comment on Strevell, this is a question in general. There are three project numbers and three control numbers on the form, which is which? STPU8013, 80062, 8009 – so if I comment by number, which is which?

A: (Ray Mengel) 8006 is Strevell, 8013 is Wilson, and 8009 is Stower.

Q: (Unidentified) Are the control numbers 4361, 4362, and 4363 in the same order?

A: (Ray Mengel) 4361 is Strevell, 4362 is Wilson, and 4363 is Stower.

Q: (Sandra Anderson) I just have a couple of questions. Does this include a bike lane? One of the things a number of people in the community are trying to do is coordinate existing resources with new planning so that it gets integrated into one whole piece. There has been an effort in town to do bike and pedestrian pathway maps, and I wanted to know if the sidewalk that is being put in connects with other sidewalks? I'm curious as to why there isn't one on the west side?

A: (Ray Mengel) The street width that was developed for Strevell is going to be the exact same street width as north Strevell. It will be the same width from back of curb to back of curb. So it is not going to be any wider than the curb to the north. The sidewalk will tie into the new sidewalk on Wilson but will end at Balsam. It will not continue around the curb.

All three projects do not have bicycle facilities designed into them at the current time. It was felt that traffic volumes and traffic speeds are low enough that the bicycles can share the driving lanes with the vehicles. So currently there are no bicycle lanes being constructed with this project.

Q: (Sandra Anderson) Is there right-of-way so that in the future there could be something?

A: (Ray Mengel) The right-of-way is really minimal. We are having a difficult time trying to confine everything to the existing right-of-way. Like I said, in this area we are going to acquire a little sliver. So there will not be enough right-of-way for a separate bike path for the future.

Q: (Patrick Kelly) She asked a question about the lack of a sidewalk on the west side?

A: (Ray Mengel) I mentioned earlier that we did not design a sidewalk on the west side because the covenant in that subdivision prohibits a sidewalk in that area. So we did not put one in with this project.

Q: (Patrick Kelly) Is the street a legal boundary within what we would see as the boulevard on the west side of that street? Does the legal boundary of the street extend beyond what is visible in pavement on the west side?

A: (Ray Mengel) The legal boundary extends past the curb there, yes.

Q: (Patrick Kelly) So the legal boundary of the street is into the grass?

A: (Ray Mengel) Yes that is correct.

Q: (Patrick Kelly) So why would the covenant among the property owners and County Club Estates prohibit a sidewalk?

A: (Ray Mengel) Actually it appears to me, I would have to scale this thing, but on this detail map, the curb and gutter that is in there is in the gray toned area. The property line is out here maybe another ten feet further – almost twelve.

Q: (Patrick Kelly) So what we would see if we were there would be the curb and then twelve feet to the west would be the legal limit of the street?

A: (Ray Mengel) According to the legal survey we did, yes.

Q: (Patrick Kelly) So that would be more than ample room to build a sidewalk?

A: (Ray Mengel) But you would have to move all those luminaries. There are luminary lights right behind the curb and gutter.

Q: (Patrick Kelly) You mean streetlights?

A: (Ray Mengel) Yes.

Q: (Patrick Kelly) Were they constructed by County Club Estates?

A: (Ray Mengel) Yes.

Q: (Patrick Kelly) So is it your position that if the property owners do not want a sidewalk on their side of the proposed street that would be the plan throughout the project?

A: (Ray Mengel) Well the other issue, Pat, is that even if you constructed a sidewalk on the west side there is no place for it to tie into. In other words, people would get on the sidewalk and there would be no place for them to get onto another sidewalk. If you build a sidewalk along here and there is no sidewalk down Balsam or on the other street ....

Q: (Patrick Kelly) So would you say then it was simply good planning on their part to keep their area a little bit less congested?

A: (Ray Mengel) I couldn't answer that.

Q: (Patrick Kelly) Is it true for the record that you've examined Balsam Street and the other streets within that small subdivision? You've driven them?

A: (Ray Mengel) Yes we've driven on them.

Q: (Patrick Kelly) And they are all in the cul-de-sac?

A: (Ray Mengel) Yes.

Q: (Patrick Kelly) And traffic cannot proceed through that subdivision, it has to turn around? Every street is a dead end?

A: (Patrick Kelly) Correct. But again, we have no involvement in that because those streets in that subdivision are not on the urban system for Miles City.

Q: (Patrick Kelly) So it was an error to site the restricted covenant of the subdivision in stating that as the reason for the lack of sidewalks? I can tell you when I drafted the restricted covenants, it was the first thing I ever did in this city. I'm just trying to ....

A: (Bill McChesney) I'm the District Administrator. The reason there are no sidewalks there is because the city didn't request sidewalks be built. I understand the reason is because of the restricted covenants.

Q: (Patrick Kelly) But you can see from this discussion that the restricted covenants have nothing to do with it.

A: (Bill McChesney) We don't have a clue, we don't have any involvement in it.

Q: (Patrick Kelly) That is what the City told you?

A: (Bill McChesney) You will have to visit with the City. We are just designing the project.

Q: (Patrick Kelly) Correct, but this is one of the times when we are here to learn.

A: (Bill McChesney) But you are directing your questions to us and we have no answers for you. You need to visit with the City.

Q: (Patrick Kelly) But surely in designing this you think you would pay particular attention to the legal ownership of the ground upon which you construct your improvements?

A: (Bill McChesney) Yes.

Q: (Patrick Kelly) And that is why you know where the boundaries are for the street? So are talking about something that would have occurred within the boundary of the street. You need not know anything about the restricted covenants in that regard?

A: (Bill McChesney) No, the restricted covenants are part of the design. We were under the understanding there were restricted covenants that prevent sidewalks on the west side of the street, whether it is within or without the boundaries of the street. You drafted it, you know what it says.

Q: (Patrick Kelly) I know what it is, I'm trying to find out if you do.

A: (Bill McChesney) No we don't.

Q: (Patrick Kelly) Well then I think that bears some further investigation. The restricted covenant in this case is not a public statute or public regulation. It is an agreement among the property owners within that subdivision.

A: (Bill McChesney) What is your point?

Q: (Patrick Kelly) My point is that it is a spurious reason not to build a sidewalk. It is not a valid reason to not build a sidewalk. If it is because they don't desire a sidewalk, then I want to know that because in other portions of the suggested project, sidewalks are mandated. I think that should be examined. I will tell you a restricted covenant cannot affect that area owned by the public in the form of a dedicated street.

A: (Bill McChesney) Ok, we will look into it.

A: (Bob Mengel) Pat, at the last public meeting we took kind of straw poll at the meeting

and everybody told us they only wanted the sidewalk on the east side. That was in February 2002.

Q: (Patrick Kelly) I'm just trying to figure out what the criteria are. I think it would be very fair to say that in this case the neighbors to this particular project do not want a sidewalk.

A: (Bill McChesney) We don't have a clue.

Q: (Patrick Kelly) You contracted to have an environmental assessment conducted, you have conducted hearings, and you have some idea of the wishes of those people in the area, correct?

A: (Kristin Kenyon) Only by way of who comes to the meetings. They could be here tonight. Is there anybody here from that neighborhood that would like to speak to this topic or knows anything more about the covenants? (No answer)

Q: (Patrick Kelly) Be advised, I don't object to the fact that there are no sidewalks. I'm just interested in the reason why there isn't one. Mam, you are from David Evans and Associates? You are not listed as a member of the people who are described as preparers of the EA.

A: (Kristin Kenyon) Yes sir I am, at the back of the document.

Q: (Patrick Kelly) Do you do "on the ground" work in the preparation of the EA?

A: (Kristin Kenyon) Yes, we've done research.

Q: (Patrick Kelly) In the Strevell project from Wilson south, did you interview any of those neighbors?

A: (Kristin Kenyon) No. The only way we've gotten public comment is from the public meetings, through letters that several people wrote to us, and from phone calls. Unfortunately the contact with that neighborhood, I don't remember specifically any comments from them, do you Ray?

A: (Ray Mengel) Yes, there were people from that neighborhood at the first public meeting. They gave comment to the fact that they did not want the sidewalk. That is part of that record.

A: (Kristin Kenyon) But they had the legal backing of the covenant?

Q: (Patrick Kelly) Regardless of the technical nature of the covenant, if that weren't the case, you would still abide by their desires?

A: (Bill McChesney) ... (inaudible) ... a sidewalk on the east side.

Q: (Patrick Kelly) But Ray Mengel indicated the straw poll was important to him.

A: (Bill McChesney) Because it was our understanding at the time that the covenant prohibited the sidewalk. Now if the covenant doesn't prohibit sidewalks we can certainly revisit that. I'm sure the City would be very receptive to the addition of sidewalk on the west side of Strevell.

Q: (Patrick Kelly) One of the things that would be taken into account would be the desires of the homeowners?

A: (Bill McChesney) Well, to some degree.

Q: (Dorothy Armstrong) Are there going to be parking lanes on Strevell or will it just be traffic lanes?

A: (Bill McChesney) Just traffic lanes. Again, Strevell was being constructed to match Strevell going to the north. When you say parking lanes, people do park along there but that is not according to standards that MDT has. They are narrower. But people do park along there. I guess that would be up to the City to pass an ordinance to establish signing for parking along there but we are not developing a separate 9-10 foot parking with this project.

Q: (Karen Morris) Ray, I just wanted to make certain I understand ... basically from what I've seen of Miles City, most of it does not have a designated wide parking lane. Most of Miles City does not have designated parking because people in small towns generally are capable of parking along the curb and handling it quite successfully in a narrower area. Is that a fair statement?

A: (Ray Mengel) I don't know the traffic habits in all communities in Miles City so I can't answer that.

Q: (Karen Morris) For example, down the rest of Strevell, people park there even though it is not the wide parking lane. I think if you observe downtown or somewhere like that, you would notice that along most of those curbs people commonly park down both sides. In most of Miles City you won't find signs that say you can park here. Bill lives here, is that a fair statement?

A: (Bill McChesney) In some cases yes, and in a lot of cases no.

Q: (Karen Morris) Basically if it not marked as "no parking", you generally see people

parking, correct?

A: (Bill McChesney) Yes, and it is very unsafe to travel a lot of those streets.

A: (Ray Mengel) I find that when I drive this, it really is a hindrance to the traveling public because you've got to be watching the traffic coming from the other direction so that you don't weave where vehicles are parked because there isn't enough width for two vehicles to get by when vehicles are parked on both sides. So you have to do a lot defensive driving.

Q: (Karen Morris) But in most cases, unless you have a rummage sale or something else that is very exciting in Miles City, you very seldom see the streets parked twelve on both sides. You might see a vehicle parked here or there, but they are not usually parked full on both sides.

A: (Bill McChesney) Karen, I think we need to deal with the three projects. We could go all over Miles City and find cases where what you are saying applies and we could go all over Miles City and find cases where it doesn't apply. But we need to stay very focused on Strevell, Wilson, and Stower and address those parking and vehicle movement issues on each one of these projects. We can speculate all we want, but ...

Q: (Karen Morris) Part of the reason for my question is simply that I go to rummage sales sometimes in this area and I want to know if I can park legally or if I'm in trouble.

A: (Bill McChesney) I would assume, as long as it is not zoned "no parking", then you can park there.

A: (Ray Mengel) We design things in metric so I'm trying to convert this in my head, but this will establish two 12-foot driving lanes and just about 5 feet of parking area which is a little bit narrower than normal. That is what you will end up with on Strevell.

Q: (Janet Kelly) For the Water Group Way. What is the benefit to our community for the proposed Strevell Street project?

A: (Ray Mengel) This again was determined by the public of Miles City. They are the ones who picked the priorities. All MDT did was notify the City of Miles City and the County that there was urban funding available upon request from the people of Miles City and the County to select priorities. These are the priorities that you selected. The criterion was that they had to be on the urban system. This is on the urban system. So it is my understanding that the County and City held public meetings and you picked the projects. We didn't pick these. They came to us prioritized. In fact, actually as I recall from the record, you guys picked six projects. We came back and told the County and City, there was not enough funding for six, so they narrowed it down to these three. So the County



and the City actually picked the projects as the priorities, we didn't.

Q: (Janet Kelly) So now that we have an actual conceptualized project, which we didn't before, this meeting is to provide the community an opportunity to let you know how we feel about how the projects evolved and were conceived as we move towards construction? Is that what we are doing here this evening?

A: (Ray Mengel) Basically what MDT is doing here this evening is ... the people of Miles City have selected the three projects, we are designing these three projects and so we would like to have your comments on the design elements this evening.

Q: (Janet Kelly) I'm still a little bit confused. We knew exactly what the projects were way back when? I don't think so. I think it was just areas.

A: (Kristin Kenyon) It was the project boundaries but the specific conceptual design features weren't worked out at that time, like the widths.

A: (Ray Mengel) The design features were not done at that time.

A: (Kristin Kenyon) The engineering stuff wasn't done.

Q: (Janet Kelly) So to repeat my question once again, this is the opportunity to provide comments on the projects as they evolved? Because we didn't have anything to respond to when the projects were picked?

A: (Ray Mengel) Correct.

Q: (Joan Scott) Are there any other comments or questions on Strevell? Not hearing any or seeing any hands, we will proceed onto the Wilson Project.

## **PRESENTATION ON WILSON STREET**

Ray Mengel: I failed to give you kind of a preliminary estimate on what this is going to cost here. It will be about \$250,000 for the Strevell Project.

So now I will move onto the Wilson Street Project. This project is the number one priority selected by the City and County. This project starts at the intersection of Strevell and Wilson and continues easterly for about ½ mile to the intersection of South Haynes Avenue.

Proposed Design: Based on comments received from the last public meeting held one year ago in February, the project is being conceptually designed to these design elements (referring to graphic): two 12-foot driving lanes, a 9½-foot parking lane on the north and south side, curb and gutter only on the north side, and a new sidewalk on the south side. That sidewalk will then tie

into the sidewalk on South Haynes Avenue and also the one on Strevell. Included in that, based on the last public meeting, we took a vote on whether to have an open ditch left there or to close it under the sidewalk, and the people unanimously wanted the ditch enclosed. So we are enclosing the ditch with a new storm drain system along the south side of Wilson and putting that under the sidewalk. The north side will not have sidewalk, it will only be on the south side.

On the north side for the most part, most of the improvements that are in place will not be impacted. This area here where there are some hedges (referring to graphic) at least to Stacy Street, those hedges will have to be removed to get the curb and gutter in. There is a power line that runs along there on the north side, and the curb and gutter will not impact the power line or the lights that are in place, so we won't have to relocate those.

Parking: There are areas where people park kind of out towards the street. Because we are making it wider and providing that 9½-foot parking lane, you will no longer be able to do that because we are going to shorten up your driveways. Again everything is going to be constructed on the north side in the public right-of-way. We are not acquiring any additional right-of-way on that side. But those people who park perpendicular to the road now will probably have to park parallel in front next to the new curb and gutter. There will be room for them to do that. They still get a parking area. As most people travel in that area, you see vehicles sticking out into the street, and, because of the wider street, they will no longer be able to park that way.

Storm Drain: On the south side again, we are going to enclose the storm drain system, because we are adding more to this outdraw that goes through the subdivision from the high events where we get heavy runoff after snow or thunderstorms. We are going to construct a detention pond in this area (referring to graphic) so that the water that comes down from this area and from this field will go into this detention pond and be held there and then metered out into the enclosed storm drain system with a six inch copper.

With this detention pond, we originally proposed to build it somewhat like the one by Albertson's with the River Rock and the chain link fence around it, but the City has come back and asked us to take a look at making it wider and flattening the slopes on it so that when the thing dries out you can doze through this area. The chain link fence would be a hindrance in doing that type of operation. This will require us to secure right-of-way for this from this property owner here (referring to graphic). Then right down here in this area, because the right-of-way is narrow, to get that new storm drain system in place, we will have to secure a sliver of right-of-way in there roughly about ten feet wide. That is the intersection of Wilson and Strevell.

Right now we will drain all those approaches that are in here into that new storm drain system so the water that now comes off of those approaches and dumps into the open ditch will drain into the new storm drain system. The hospital also has a detention pond in this area and they have a culvert in this area (referring to graphic) that is very (inaudible) and dumps water into the open ditch now. We would like to remove that flat piece here and remove part of the pipe, put a

concrete collar around it and put a small pipe in there to allow drainage to get into the new enclosed storm drain system. So when this fills up and when the water gets so high, it will also go into the new storm drain system.

Parking: Down here by Subway, a lot of their parking area is in the public right-of-way. We are going to put in a curb cut so people can still park there. We won't eliminate the parking. A lot of times we stand the curb up so people don't have access, but in this case we will just lay it down all the way across this parking lot and allow people to still park there. So it shouldn't have any impact at all to that business. It will be a benefit to have all the drainage captured in the new curb and gutter.

Right-of-way: There are a few trees along there we may have to remove and some fences that are into the public right-of-way and some rock gardens and those types of things, but for the most part we should be able to do this within the public right-of-way.

Cost: At the last public meeting, we had envisioned this would be left as an open ditch. But the public requested that the ditch be enclosed because they did not like the open ditch up on North Haynes Avenue. We had thrown out a figure of \$150,000 for that new storm drain system. Well we've done a little more engineering on that and the cost of the new enclosed storm drain system is \$260,000. Factored into that cost are inlets on each of these streets on the north side to capture water on the north and then drain it across to put into the new storm drain system. The City asked us to go back and eliminate that and we are taking a look at that. If we do that, then it would mean the north side would drain down the streets into the existing storm drain system along Sudlow. That way we think we could save \$100,000 out of \$260,000. So excluding the storm drain system, the project cost is approximately \$525,000. So if we eliminate the inlets on the north side, to do all the storm drain system we would have to add another \$150,000-\$160,000 to the cost.

## QUESTION/COMMENTS

Q: (Hans Schweighauser) I'm the owner of that little business on the end of Wilson and Haynes Avenue – the Subway Store. I was not able to attend any of the meetings due to health reasons. My main concern is what is going to happen to my clientele flow into my business while the construction is in process? Is it going to be restricted at that corner so my clientele can't get into my building?

A: (Ray Mengel) Correct because we will have to pour curb and gutter here and there will also be some surfacing done on the street. That applies to everybody along here. There will be areas during construction where the adjacent property owners will be inconvenienced.

Q: (Hans Schweighauser) Well then somebody is going to have to pay my lost income that I'm going to lose on this project because there will definitely be a lost income unless my

business is going to remain open and I have total access to it.

A: (Ray Mengel) Again, everything that we are constructing here is within the public right-of-way. Nothing is on your property.

Q: (Hans Schweighauser) That is true enough and it's public property, but my access from the public property to my business is such that I require openings that allow the public to get to my business. You can't close off my whole business because I guarantee you I'll go to court and get an injunction against this project and stop the whole thing. I am not going to lose my business because of a street project and basically that is what it boils down to.

Q: (Kristin Kenyon) How long of a construction period do you anticipate?

A: (Ray Mengel) That depends on the contractor. We have contractors who mobilize in and do things very quickly and then you have contractors who aren't quite as quick.

Q: (Kristin Kenyon) Is there any ... (inaudible) ....

A: (Ray Mengel) There is parking up in front there.

Q: (Hans Schweighauser) Yes you can park three cars in front and that's all. I can park maybe 10 cars along the side. But the access to my building is what I'm concerned about. Will my clientele have total access to my business at any time?

A: (Ray Mengel) Again, during construction in this area, your business will be impacted.

A: (Bill McChesney) You won't have access off Wilson Street for a period of time. I can't tell you what period of time that will be but you will have access to the front of your building.

Q: (Hans Schweighauser) How am I going to get my freight deliveries? They have to access via Wilson Avenue.

A: (Ray Mengel) Actually when we do a contract on this, you can get together with our project manager and we will figure that out.

Q: (Hans Schweighauser) Like I said, if it is going to impact my business to the point that I am going to lose my business because of lost income, I'll put an injunction against it because I'm not going to lose my business over a street.

A: (Ray Mengel) That's fine and it is certainly your choice. We will do everything we can to work with you.

- Q: (Sandra Anderson) I wasn't clear if there is a sidewalk on the south side but not the north side? Is there any way there can be a sidewalk on the north side?
- A: (Ray Mengel) We had that developed at the last public meeting and the people in attendance voted to eliminate the sidewalk on the north side to reduce the impacts to the properties. For instance as an example, if we put a sidewalk on the north side, he would lose all his property because he couldn't park those vehicles across sidewalk in the public right-of-way.
- Q: (Sandra Anderson) I'm talking about in the residential area.
- A: (Ray Mengel) But again the same thing applies there. It would take a lot more fences, trees, you would have to move power poles, and there would be a lot more impacts.
- Q: (Sandra Anderson) I was thinking that it might be helpful because we are desperately in need of sidewalks in this town. We have so many sidewalks that are broken up or don't connect with others and I was just thinking that the residents may want sidewalks in their neighborhoods for children to play on and the like. I understand that you considered it with the residents, but I was just concerned because we have an opportunity to get sidewalks. I can't imagine owning a home and not wanting sidewalks in front of your house for people to walk on. Also Highland Park School is in that area of the neighborhood and there are a lot of residents there so I was thinking they might want it.
- A: (Ray Mengel) We will have crosswalks down at the intersection at South Haynes and also at Strevell. We probably wouldn't have sidewalks in these areas because again there is a sidewalk in there now going to the north.
- Q: (Sandra Anderson) Our community has kind of changed. We used to have the practice where when you built a house you had to put a sidewalk in and I think we are really hurting because we haven't done that. We don't have sidewalks even around our schools now – in the school neighborhoods we are missing sidewalks and we have had some pretty awful accidents because of the lack of pedestrian pathways. I just wanted to make sure we were covering that. I understand the residents don't want that. I can't imagine not wanting them.
- A: (Ray Mengel) As I said, we had it designed in there but the first public meeting requested that it be eliminated.
- Q: (Linda Mehlhoff) I'm one of the residents on Wilson that didn't want the sidewalk on the north side because I wanted to save the trees. I'm about three blocks off Haynes and there are four big cottonwood trees in my front yard. Do you have any idea at this time if they go or they stay?

- A: (Ray Mengel) With the curb and gutter, they would not have to go, but if we put in a sidewalk, they would have to go.
- Q: (Linda Mehlhoff) Right. That is why I don't want a sidewalk.
- Q: (Sandra Anderson) I understand. In other neighborhoods we moved the sidewalks up so you would have a boulevard.
- A: (Ray Mengel) We would have to acquire right-of-way to do that.
- Q: (Sandra Anderson) Can a resident put a sidewalk in if they want?
- A: (Ray Mengel) They would have to clear that with the City. Again we are just developing these projects for the City.
- Q: (Sandra Anderson) It just seems like we should coordinate for a sidewalk.
- A: (Ray Mengel) Once MDT is done with the design and construction of this, we would turn it over to the City for the maintenance and the operation of the system. So you would have to coordinate that with the City.
- Q: (Joan Scott) Any other comments on Wilson? Ok we will move on to Stower.

### **PRESENTATION ON STOWER AVENUE**

Ray Mengel: This project again starts at the intersection of Stower and Strevell and continues easterly for approximately ½ mile to the intersection to Stower and South Haynes.

Proposed Design: Based on meetings with the City and some involvement from the public at the last public meeting, we went back to the City and proposed some concepts. The design that we currently have was approved by the City Council on March 28, 2003. We have two 12-foot driving lanes, and a 9½-foot parking lane on both sides, new curb and gutter, and a new sidewalk placed directly behind the curb and gutter. That is what was approved by the City Council at that meeting. That would continue all the way through to Sewell and to Moorehead. This is an area where we have to acquire right-of-way through here (referring to graphic). That street width would be the same street width as it is going to the east. Once you get to Moorehead, again we will use the curb and gutter and sidewalk in place there and just resurface this area. The easterly portion or easterly leg of Stower is wide enough to fit our current design standards.

Impacts: With this design there will be lots of impacts to trees on the north side and some spotty impacts to a few trees along the south side. This whole block from Stacy to Stower, those trees would all have to be removed with this current design. Then again probably down to the biggest

point to this intersection of Sewell, those trees would also have to be removed. Also by the field behind the school, if we keep the current design, the trees in the boulevard would have to be removed – there are a few of them in that area, not too many, just a few.

Storm Drain. We are going to use the existing storm drain system in place from Irwin to Strevell. We will remove the existing inlets at the intersections and install new inlets because we are wider but they will be connected to the same drain hole system. They will just be moved farther out for the new device install. Again, all the intersections will have the ADA upgrades.

Once you get down to Earling, we are going to bring this new drainage and this new open field and the curb and gutter section, back to this intersection. We currently have the detention pond to hold water here in this area, and the City has requested that we move that detention pond to the north side and so we will probably do that. We will then meter the water out of the detention pond into a new storm drain system from Sewell to Earling and it will connect into an existing manhole right at that point. So there will be one block of totally new storm drain system right there. From this point at Moorehead, this water drains towards Haynes Avenue. So that will go down the inlets on Haynes.

Again the biggest impact with this design is the loss of a lot of your rock gardens and flower gardens that are in the intersections and the boulevard. Everything is going to be confined from Strevell to Sewell within the existing right-of-way. At the church, we are proposing to develop a handicapped-parking access for them. They currently do not have a standard handicapped parking area. Also we are going to propose laying the curb down for them so you can drive into an entrance instead of parking on the sidewalk area there.

Basically that is the current design. We met earlier with the City and we've thrown out a few options to make some changes to that. So I'll go through those changes first before we open it up to comments.

Newly Proposed Concepts: Again we designed the project based on what the City and the public wanted at the public meeting. What we would like to do is to go back and make some adjustments to that. Instead of putting the sidewalk on the north side in this first block right behind the curb and gutter, let's leave the trees in place and put the sidewalk on the north side of the trees and it will all still fit within the public right-of-way. We won't have to take any of those trees along there. The same thing would apply at the school. We would take out the sidewalk next to the chainlink fence, because it is all broken up and cracked. We will replace it with new sidewalk and put it all back in the same location, and leave that boulevard in tact. We would be willing to plant a few extra trees to beautify the area.

One of the things we talked to the City about was contacting the school to see if they can relocate those gates. We think if they move the gates to the middle of the block it would encourage the children to get on the sidewalk instead of darting out and cutting across the intersections. The other thing we would like to do is to use this as a concept design – on the east

side of Earling up here by the church, they have parking along with curb and gutter and as you get close to the intersection you have those bulb-out areas. We would like to do that at every intersection all the way along this route. That gets the traffic back off the street in a more confined area but it also opens up the intersections so that the pedestrians can walk out into those bulb-out areas and look for the traffic. Then we would put crosswalks at every one of the streets – the tall green signs that make people aware there is a crosswalk there. Again we would put up new signing and pavement markings.

Another thing we talked to the City about was I know there is a big concern about traffic speeds. We would like to propose raising the elevation of the intersections so that it would deter people from hitting them at a high rate of speed because it would air-borne them. It would encourage them to slow down at the intersections. We think the raised intersections will improve the visualization at the intersection to be able to see the traffic better and the pedestrians better, and it will also certainly hopefully reduce the speed of the traffic. Those are some of the things we proposed to the City today. That is what we call traffic calming measures.

We are concerned about the pedestrians and the traffic. We drove down there again today and right now, because sidewalks are “hit and miss” throughout the area, we found people walking down the streets. With new sidewalks all the way through this, hopefully the pedestrians would use the sidewalk facilities instead of the streets – we are hoping. We did see some people on the north side walking on the street, but I guess that is their choice.

Price: The new storm drain system on this Stower Street Project will be approximately \$90,000. The total project cost is going to be \$550,000.

That is basically the concept for Stower, so I guess we can open it up for comments.

## QUESTION/COMMENTS

Q: (Patrick Kelly) These ideas that you discussed with the City, for example your motorcross idea for airborne calming efforts might not happen or it might happen. You might consider in Missoula where they did the round-a-bouts in the area between Higgins and the University. That would be that same type of attempt at calming. Correct?

A: (Ray Mengel) We probably wouldn't consider round-a-bouts.

Q: (Patrick Kelly) Is it fair to say that the plan is in development?

A: (Ray Mengel) When you talk about the conceptual design plan – the geometrics, the vertical and horizontal lines are set. What we are talking about now is design enhancements, i.e., things like bulb-outs, and raised intersections. Those are things that help encourage traffic to go at a slower rate of speed through there.



Q: (Patrick Kelly) Let's suppose that everybody starts singing "cum by ya" and thinks this is all wonderful, when will the construction begin?

A: (Ray Mengel) Our original goal was to have it go to bid by July of this year, but we can see we are not going to make that. So now we are targeting late Fall so then the construction would start next Spring.

Q: (Patrick Kelly) In the Spring of 2004?

A: (Ray Mengel) That is correct.

Q: (Patrick Kelly) I have some questions for Ms. Kenyon. When were you first introduced to this project?

A: (Kristin Kenyon) A year and a half ago.

Q: (Patrick Kelly) Is it fair to say that your examination for the EA on Stower was restricted to the area between the intersection of Stower and Strevell and the intersection with Haynes?

A: (Kristin Kenyon) The immediate impacts to the adjacent property owners. We also looked at the general impacts and we interviewed people about how this traffic circulation had changed.

Q: (Patrick Kelly) Whom did you interview?

A: (Kristin Kenyon) We talked to John Marks the City Planner. He was our main source and he gave me correspondence from the different businesses along Haynes and Main street.

Q: (Patrick Kelly) Are those business correspondence, are they included in the report?

A: (Kristin Kenyon) Yes, they are in the back in the Appendix.

Q: (Patrick Kelly) Did you have access to the materials that were given out at the February 28<sup>th</sup> meeting?

A: (Kristin Kenyon) Yes.

Q: (Patrick Kelly) Did you note the opposition of the First Lutheran Church?

A: (Kristin Kenyon) Yes.

Q: (Patrick Kelly) Why was that not included in the appendix?

A: (Kristin Kenyon) It is called out in the text itself. I wrote about the opposition, their concerns, and also the schools and I wrote about the children's letters.

Q: (Patrick Kelly) In the example you gave of an enhanced traffic frequency, I think it goes from 200 sum to 777, and one passenger car had a factor of 3½ and it goes to a factor of 4 times for trucks. Is it not true that impact would extend along the entire length of Stower from Haynes to its intersection with Eighth, and in all probability all the way downtown?

A: (Kristin Kenyon) Unfortunately Mr. Kelly, I did not create the traffic projections. That was done by a fellow who was unable to attend tonight.

Q: (Patrick Kelly) What is his name?

A: (Kristin Kenyon) His name is Al Vanderway of MDT. We have the supporting documents in the back there. I don't know that he distinguished between trucks and vehicles.

Q: (Patrick Kelly) It is and it is in the report.

A: (Kristin Kenyon) For the most part he focused on just the project area for his traffic projections.

Q: (Patrick Kelly) Are you aware that this street – Stower to this intersection here (referring to graphic) – connects to downtown through a railroad crossing?

A: (Kristin Kenyon) Yes.

Q: (Patrick Kelly) Would it be fair to say that the reason for the enhanced traffic then is for people to get from the Haynes Avenue commercial area to downtown?

A: (Kristin Kenyon) Yes. That is one of the benefits.

Q: (Patrick Kelly) That is a benefit the City has identified?

A: (Kristin Kenyon) Yes.

Q: (Patrick Kelly) So therefore the enhanced volume here will be enhanced the full length of Stower, will it not?

A: (Kristin Kenyon) It would likely increase.

Q: (Patrick Kelly) Would you also agree then that the EA does not really focus on that

portion of the neighborhood from Stower and Strevell to downtown?

A: (Kristin Kenyon) That is a very good point. Yes.

Q: (Patrick Kelly) And that it is incomplete in that respect?

A: (Kristin Kenyon) Yes sir. That is a very good suggestion. We will go back and look at that. Can I write that down?

A: (Patrick Kelly) Yes indeed.

Q: (Darrin Grenfell) Federal Highways. Kris are you saying that our new traffic section did not address the impacts beyond the project limit of Strevell Street?

A: (Kristin Kenyon) Well, for evaluation of impacts, we kept that limited to the study areas and for just the project boundaries. But we didn't look at noise, for example, to the houses or the different sites – community resources from Stower to the west of the project boundaries.

Q: (Darrin Grenfell) Let me ask that again. Did the cumulative impacts section address traffic volumes extending to the west of Strevell Street?

A: (Kristin Kenyon) In a general way, but not specific counts. I'm pretty sure Al's projections were limited to just this area. He estimated traffic for just our project boundaries.

Q: (Darrin Grenfell) So there was a macro review, so what you're asking is whether there was a micro review of all the impacts beyond those limits?

Q: (Patrick Kelly) You are from the Federal Highway Administration?

A: (Darrin Grenfell) Yes.

Q: (Patrick Kelly) Where is your office?

A: (Darrin Grenfell) In Helena.

Q: (Patrick Kelly) In Helena? So you are certainly aware Mr. Grenfell that the Federal Highway Administration pays particular emphases on community impacts. Isn't that correct?

A: (Darrin Grenfell) Correct.

- Q: (Patrick Kelly) And so if this report and this study does not really study the impact of the project on the area west of Strevell and Stower, then it is deficient and it couldn't possibly meet the standards for community impact assessment?
- A: (Darrin Grenfell) That is why I was asking the question I was asking. I think what we are hearing is that the document does consider those impacts, but you are saying we need to take a look at more of the specifics of those impacts?
- A: ( ) We are required to look at cumulative impacts, meaning what does our project do beyond just the specific limits of the construction. So construction is proposed right now from Strevell Street to Haynes along Stower, and you are asking what are the impacts beyond that. Our impacts are really only to look at cumulative impacts we might have and I think from what our consultant was saying we probably need to improve that in that area. Now when I reviewed that document, I guess I didn't see that we had an error in that area. So I think we are saying that it sounds like we need to review that addition and that we are agreeing with you that it needs additional review.
- A: (Kristin Kenyon) I think that Pat brought up a great point. Most typical EAs look at just the local study area boundaries for a project in relation to wildlife, noise impacts, etc. But because Stower would change the traffic circulation for your City, we have noted that we have been cognizant of that throughout writing the document and we've tried to weave that into the different sections. For example, in the Economic Impacts Section, that is why some of the businesses along Main Street are in favor of the project because they feel they are going to get a lot of benefit from the improved direct access, so we did have that in that regard. We did try and provide a macro level assessment– looking at the whole picture. We didn't go block-by-block west of Stower and look at whether a certain person's property would be impacted because it is not within the project boundaries. So we felt like we did an adequate job assessing the cumulative impacts, but the traffic projections are still the greatest impacts. We can have you talk to Al Vanderway, I'm sure he can give you the numbers and documentation. He was very conservative with those numbers. We had talked to City staff (John Marks), and Pat Rogers might be able to reiterate this, they felt those traffic projections were actually quite high and maybe too high in that report. But we felt it was good to keep them on the high side just to be erring the side of conservatism.
- Q: (Patrick Kelly) From what I understand, the Federal Highway Administration requirements no longer have the goal of a long straight narrow street for the benefit of automobiles. They are more and more considering the benefit to the neighborhood and community impacts?
- A: (Kristin Kenyon) That's right.
- Q: (Patrick Kelly) One looks at the history here of First Lutheran Church and Highland Park

School. When they were placed in the late 50's and early 60's, this was a quiet neighborhood. With this project, it will be a much different neighborhood and that extends out all over this quadrant of this community, would you agree?

A: (Kristin Kenyon) I don't know. I would have to defer to the people who live on that street.

Q: (Patrick Kelly) You're a community planner right?

A: (Kristin Kenyon) Right. But I don't live here.

Q: (Patrick Kelly) I'm talking about the principle of this EA. Federal Highway Administration has gone through a change from what it was 20-40-50 years ago. In the last ten to twenty years, the neighborhood impacts and community impacts, for example, historic neighborhoods are viewed as a benefit and fast moving traffic is not, in general. Correct? We are mandated in the Federal and the State and City level to consider those? Right?

A: (Kristin Kenyon) Yes.

Q: (Patrick Kelly) Would you also agree that as far as safety, and this must have been one of your concerns, a wider street is a more dangerous street?

A: (Kristin Kenyon) Not necessarily.

Q: (Patrick Kelly) Are you aware there are studies to the contrary?

A: (Kristin Kenyon) Yes.

Q: (Patrick Kelly) And you disagree with those studies?

A: (Kristin Kenyon) No. I'm saying that a wider street does not mean that is necessarily an unsafe street.

Q: (Patrick Kelly) A wider street with through traffic is less safe than a narrow street that doesn't have through traffic? Correct?

A: (Kristin Kenyon) That depends.

Q: (Patrick Kelly) I think that is a simple question. A wider street that has through traffic four times greater than before is a less safe street for pedestrians – not probably?

A: (Kristin Kenyon) I don't agree with that. No.

Q: (Patrick Kelly) A wider street is not necessarily more dangerous than a narrow street regardless of traffic even though pedestrians would have a wider surface to cross?

A: (Kristin Kenyon) No. It depends on how pedestrians and traffic are handled.

Q: (Patrick Kelly) Assuming the pedestrian is not elevated in a skywalk, would it be more dangerous for a four year old to cross the street from the Round Park School to the First Lutheran Church if this street were wider, especially with enhanced traffic?

A: (\_\_\_\_\_, MDT) I can see you have a lot of questions. I think it would be best to get your specific comments written down so we can address them specifically. Otherwise I think we could be here for a long time to be able to adequately and correctly answer all your questions. There are studies for and against some issues you are talking about. When we looked at the safety of a particular roadway, you have to take into account many, many factors that are beyond the general questions you are asking. For example, one of the things that was brought up is the issue of potentially putting in bulb-outs along the intersections. That would facilitate better crossings for pedestrians. That is one of the reasons why it's being proposed. So I guess, as far as I'm concerned, it would be preferable for MDT to receive your written comments and we can also talk with you afterwards.

A: (Kristin Kenyon) We can talk with you afterwards but I would like to hear from some more people.

Q: (Patrick Kelly) I have just a couple of other questions.

A: (Kristin Kenyon) Can we open it up to some more people?

Q: (Patrick Kelly) Ok. I have just two more questions (1) would Mr. Mengel agree that the vast majority of people commenting on Stower last meeting, were against it?

A: (Ray Mengel) At the public meeting or in the letters that we received?

Q: (Patrick Kelly) In the public meeting.

A: (Ray Mengel) I think most of the people at the public meeting were opposed –though I'm not sure if others didn't want to get up and make a comment. We did receive a vast number of letters from the people in the community in support of the Stower Street project after the public meeting.

Q: (Patrick Kelly) So then a different rule was applied to Wilson and South Strevell, when you said there was a vote?

A: (Ray Mengel) Whatever.

Q: (Patrick Kelly) No, you did say earlier there were votes taken on Wilson and South Strevell and that you were abiding by those votes at the public meeting.

A: (Ray Mengel) We took that public vote to the City Council and asked them to make the final decision on design concepts for Strevell, Wilson, and Stower. So we did take the input, and also from Stower residents, to the City Council.

Q: (Patrick Kelly) I'm just trying to find out what the criteria is for these various decisions?

A: (Kristin Kenyon) I think what Ray is saying is that at the last meeting we got input from people on Wilson Street that helped in making modifications to the conceptual design. And actually that is what we are hoping to get more of tonight from instead of just an argument. I don't think anybody wants to argue. But we do want your suggestions – whether you would like the sidewalk in between the trees and the grass, or no sidewalk.

Q: (John Scheuering) Can I assume that if there was no impact study done west of Strevell, then there was no impact study done east of Haynes?

A: (Kristin Kenyon) Yes that is correct. Other than what is captured in the macro, overview and the cumulative impacts section.

Q: (John Scheuering) Was there any input done to the Michael's Addition? Was there any comment period given to the Michael subdivision residents since it certainly will impact Michael's addition to a great degree?

A: (Kristin Kenyon) I'm sorry, I'm not familiar with that area.

Q: (John Scheuering) It is east of Haynes.

A: (Bill McChesney) Actually that is what this whole process is about. We had our consultants develop the Environmental Assessment. We are now in the middle phases of the public comment period and we and our consultants are more than happy and we encourage you to provide your written comments. If you are a resident of Michael's Addition or have concerns about potential cumulative impacts, you certainly need to voice those, so they will be taken into consideration.

Q: (Kristin Kenyon) Do you see this project as a benefit?

Q: (John Scheuering) I see it as a detriment. Another question is why Stower was picked as a through street rather than Comstock since Comstock is a right entry street?

- A: (Ray Mengel) You would have to ask the City and the County.
- Q: (Jim Haggerty) I live right next to the Highland Park School. Pat's interest is because the historical site is his property; my interest is because I live on Comstock. My question regards the theory that Stower Street west of Strevell is going to increase the total – because much of the traffic goes down Comstock, jogs up Strevell and Stower. So Stower already west of Strevell is carrying much of that traffic. The question of impacting the school, we live right across the street from there, and the kids all come out on Comstock. You can see very little traffic and school children up on Stower right now. As far as the width of the street being safe because we had a stubborn City Engineer when they paved Comstock, they wouldn't widen the street like the people wanted and he said this is what it is going to be – a narrow street. When they have occasions at the school and there is a lot of traffic parked on both sides of the street, the traffic has to weave through that area right now. As far as the safety and letting a four-year child try and cross the street, anybody who lets their four-year child cross the street alone is (crazy).
- Q: (Ed Martin) I live at 2307 Stower. I have basically two questions. One, will this street be designated as a truck route because of its width?
- A: (Pat Rogers) There is no plan to designate Stower Street as a truck route. No.
- Q: (Ed Martin) My second question is does somebody know the impact on the property owners' values and what it is going to do to our property values? Will it reduce them?
- A: (Kristin Kenyon) I wish I had a crystal ball then I would be rich. Again, I don't live here. The traffic will increase. Personally I don't think it is going to affect property values that much.
- Q: (Stan Taylor) I raised this question some months ago: is one of the options to leave as is? At that time you said it was an option. You've addressed the traffic but you haven't addressed the quiet nature of the neighborhood, which will be sacrificed. That is one of the issues if we go on with this. Property values are another issue. A question comes to mind, because property values are very questionable, as soon as traffic picks up – I suppose some people like a busy street but most prefer when they live in a quiet neighborhood to remain as a quiet neighborhood. This will have a negative impact on the nature as it stands now.

Who has priority relative to the decision for a project like this? Do the business owners on Main Street and Haynes or the property owners who will be directly impacted by it? The benefits to the businesses are at best speculative. On the other hand, the impacts to the property owners is almost certainly negative. That has to be addressed and I don't



know that it has. We made public comments. We were asked to submit our comments in writing. When were they considered? Were they considered? Those are some of my questions. I would like those addressed. I think we all want to know who really made the decision. There are a lot of people who live there that are opposed to it. Now you can say you received comments from any number of people who are in favor of it, but I'll bet they don't live there. They aren't going to be directly impacted. It is my feeling that those who own property and who are going to lose trees, and are going to have the traffic patterns quadrupled by their house, they really have priority over someone who might live several blocks away and feel it would be a more convenient route to Wal-mart or to Albertson's.

Q: (Karen Morris) I read the EA. Actually I read it several times and I was little bit dismayed because what I saw in the EA is that it contains several misrepresentations of the facts. I am, as some people don't know, actually a CPA and licensed to practice in the State of Montana. I no longer work in public accounting but I used to be an Auditor. I worked in all different fields, in fact I had a short stint with Federal Highway Administration in Helena though most of the people I worked with are gone but it was a good experience and it taught me a lot. Actually I was able to call one of the guys I used to work with years ago and get some clarification on the language used in the EA. It wasn't clear to the average everyday person. You use abbreviations that are very difficult to understand. But when I looked at the document, one of my first concerns was that I realized that anyone, and pardon the expression, for any bureaucrat who looks at this document, the only information they are going to have is what they see. They are not going to know what the neighborhood looks like or what the traffic is.

Now, having been an Auditor, I've been in a similar position where you send the little troupes out to gather the documentation and you base your opinion on whatever information they bring back to you. It is not always feasible to go back out and get additional information. So what I did was to do a little leg work for you. I have provided you with color photos, they are not the best quality, and I did 4 x 6 and enlarged them 150 percent using my color fax machine. I used a full cartridge of each color. You have 53 figures. In addition I have captioned them so you know what time of day I took them. I'm afraid I have an old camera that does not date the photo, so I gave you approximate times, locations, and comments of things of you should be observing. In addition I have prepared five pages of documentation that tells you what sorts of things were missed.

For example, I take you on a walking tour around Highland Park School when the children are inside the building – presumably when the consultants would have seen it. Well guess what, the EA says that the children go in and out on Comstock at the front of the building. Wrong answer. The front of the building is on Cale. It is the legal address that you can get out of the phone book – 716 South Cale. Also if you observe the doorway, it is a dead give away – it is a double door on Cale. Highland Park School is written on the wall. There is a flagpole, and two bus stop signs, and there is a

handicapped parking sign. All of these things might lead you to suspect that children go in and out there.

We walk down Comstock and what do we see? We see faculty parking, we see a janitor entrance, and a single door and a gym entrance also a single door. I have pictures documenting all of this. I'm just telling you what you are going to see – a walking tour. And there are no curb makings or signage indicating anything about buses stopping or handicapped parking. We walk on around to the Earling side and we have another double door with Highland Park School in big letters. We again have bus stop signs. These are good clues that these might be entrances for children. We also notice a double door with a big wide sidewalk on the northeast entrance that is a playground area.

Q: (Kristin Kenyon) Do you think Ray's suggestion that they move the gate down to the middle of the block would help?

A: (Karen Morris) No. Let me finish where we are going here. In addition to that I did a simple thing, I picked up the telephone and called the school. I can tell you exactly, and it is documented, how many children use each door to go in and out. None of them use Comstock except on special occasions. I'm talking about the doors on the school. We haven't finished the rest of the discussion of the children. We are just saying where they go in and out. I know Comstock is ... (inaudible) ... I have pictures of that too. I have 53 pictures and I have a lot more if you want them but I decided that having gone through one cartridge of each color was more than an adequate expenditure on my part.

Then we go along to the church but before we get to the church we look over to the field and unfortunately whoever took the picture that appeared in the EA on page 8 had very bad aim. They failed to notice that right next to the dead end sign that they took a really good shot of, if they had stepped back just a little bit, there is a beautiful view of the one-way street on Sewell and the 15 mph speed limit on Sewell. In other words, if you put Stower through, the current access to both the VA and MCC is Moorehead, Earling because Sewell is a one-way in the wrong direction. Guess what, if you put Stower through, you have identical access. You have not improved the access as the EA says you are going to.

Q: (Kristin Kenyon) Access to what?

A: (Karen Morris) Access to the VA and the college. You have not changed access there. One of the comment letters that I read indicated that she was going to advise her clients, that if this road goes through, to go down and take a left at the stop light. If they were going to the college, she was going to tell them to hang a right on Toole. She told them to go the wrong direction on a one-way street. Not good advice. Admittedly not well patrolled, but still not good advice.

- Q: (Kristin Kenyon) So your last comment was access to the VA? You have a problem with that in the EA because you don't think it will be improved?
- A: (Karen Morris) It remains the same. Ok, you've got Cale and Winchester that goes in front of it and somebody failed to notice, although I document it in my photos, that right across from the VA on Cale and Winchester, there happens to be Wibaux Park. You've got the park on Strevell; it is also on Cale and Winchester. There might be an impact to that if you start throwing more traffic down Cale and Winchester. It is also worth noting that both the college and the VA are typically closer than Main Street ... (inaudible) ...
- Q: (Kristin Kenyon) You have all this written out for us?
- A: (Joan Scott) I would ask that you submit that.
- Q: (Karen Morris) I have a couple of other comments that will make a difference to her. Ok, the church – I already talked about the handicapped parking, well I have pictures.
- A: (Kristin Kenyon) Can I make a suggestion? If it is specific, then just link it to the document.
- Q: (Karen Morris) I am saying that we have four spots there. I have photographs of what the traffic patterns actually are when the children come and go from school. We are a destination neighborhood. If you were to have done an Original and Destination Study, we are a destination neighborhood. We have traffic that drives to the church and to the school. Very few people drive through just to see us. It is the neighbors if they are coming home, to the church, to the school. So I took pictures for you of what the traffic was like one morning with the children arriving and on another day in the afternoon with the children leaving just in case I picked an abnormal day for my photographs. As the signage would indicate, the majority of the traffic parked at Cale and on Earling including the school bus. If you have traffic parking on the two side streets (referring to map), you have Stower, Cale and Earling are the streets that are perpendicular.
- A: (Kristin Kenyon) Would you come up here and point them out.
- Q: (Karen Morris) This is Cale and this is Earling (referring to graphic). So here you have Stower, and Brisbin is not a through street so we haven't really talked about it. This is Comstock. I'm saying your discussion on the impacts to Comstock is really bad. I will agree with that. During the hours that children are coming and going, there are bad facts on Comstock. By nature of the beast, where it is the case where the parents are parking and dropping them off on Cale and Earling, they are also hitting Stower at the same time. Merely widening Stower doesn't change the traffic pattern and it will not relieve the congestion on Comstock. The vast majority of the traffic on Comstock is school related. You are not changing that. So you are not improving the safety element, you are not

changing anything because you still have the traffic problem. In fact, if you increase the traffic by four times, then you also have a problem for any of the parents who are trying to go this way (referring to graphic) and access Stower. You may end up with much more congestion on Cale and Earling. You may be causing a larger problem.

Now the City should perhaps contemplate doing some sort of traffic control devices at the two intersections for the school and Comstock to help control the traffic and minimize it and give the children an opportunity to get across the street. If you had better flowing traffic, the children would be safer. You are going to have the traffic no matter what you do. You've currently got 199 children that attend the school. The vast majority has their parents hauling them in cars; you have very few buses in this community. That is the goal. The other thing you haven't considered about the children is the fact that this is a K through 4 school. We have children who have to cross Stower that go to Lincoln School and I have pictures of some of them. The school district in Miles City has made every attempt to keep the children safe and minimize the number of children that have to cross Main Street. If you equalize the traffic on Main and on Stower, there is absolutely no way to boot (?) these children around both of those streets. They will have to cross one or the other. There will be impacts to those children further on down.

I also took pictures for you of the extension where we have the bad corner – where Stower intersects with Apix.

A: (Kristin Kenyon) Yes we talked about that and actually you and I need to spend some time, if you can stay after the meeting.

Q: (Karen Morris) This shows that we are not solving anything. The church currently, much of the parking is in this area (referring to graphic). The majority of the congregation is around on the other areas. So we are not offering anything additional to the church in the way of parking and we are actually truncating what they have by cutting off part of their parking lot. So I'm saying that a lot of the information that was presented in the EA, because apparently there wasn't time to get an adequate overview. This is what needs to be considered and I would like to have this submitted into the public record.

A: (Kristin Kenyon) We should also let some other people talk who haven't actually had a chance to talk.

Q: (Nora Drummond) I live in New Chester addition and I want to know if this Stower project is going to help our drainage system. We have a sewage drainage that doesn't suck water in; it shoots a water fountain out into our intersection. Can anybody answer that?

A: (Pat Rogers) This project is not going improve the drainage on Dickinson or Cale. Right now we have contracted with an engineering firm out of Billings to study the drainage in

that particular area and it is our intent and our hope to route that drainage to Main Street and that will improve the drainage in that area.

Q: (Gary \_\_\_\_\_) I think the point has already been made that this extends all the way from Haynes to the downtown area. One thing notable in the EA was a projection of future accidents with the increase in traffic. There is a huge increase in traffic projected. I would also like to see a statistical projection on the number of fatal accidents. I realize that is speculative, but I think when you assess the costs...(inaudible).

My second question is directed to Mr. Rogers regarding drainage. I believe it is proposed to put a drainage pond in the new section across the field. Could someone describe if that is going to hold standing water?

A: (Pat Rogers) It would be full of standing water during the time of high run off only, such as during thunderstorms there would be water sitting in it.

Q: (Gary \_\_\_\_\_) Would that include standing water throughout the summer?

A: (Pat Rogers) It is like the one over at Albertson's, there are times it is dried up with no water standing in it.

Q: (Gary \_\_\_\_\_) I'm more concerned about the one that is across from my house. For this reason, I have a Health Department Brochure and West Nile virus has arrived in Montana and I'm told it is a very good idea to discourage standing water. I think we should leave this out .... (inaudible)... If it does mean there is a potential propagation are for mosquitoes.

Q: (Tom Clark) I live at 1705 Stower, which is on the left side of Strevell. At the risk of being ostracized by the audience, I would like to express that I very much favor having the Stower project completed so that it does go all the way through east of Strevell and onto Haynes Avenue. I would disagree with many of the opponents here tonight and their comments about the impacts of the traffic flow being as heavy to the west of Strevell and Stower as the result of putting the Stower project through. Much of that traffic, in my opinion, is currently coming off of Haynes Avenue at either Wilson or Comstock, then it is coming to the corner of Strevell and Stower and it is working its way downtown on Stower past my house at the present time. I'm not saying there won't be an increase; I think there will be. Some traffic coming down Haynes Avenue right now and going onto Main Street will probably cut off at this new Stower crossing and will come on down Stower Street into the downtown area. Those people who are trying to go downtown would come into downtown on the east side or be going to a destination that is east of 10<sup>th</sup> Street, would continue to use Main Street as their route to get there. They would not, in my opinion, use Stower as their access.

I do have a concern but not with the design. It is with our local officials and the issue that Mr. Martin (?) raised about truck drivers. I would be very concerned if this new access into downtown became a truck route for all that traffic coming off the Highway 59 interchange and wanting to go to Jordan. It would work its way to the Main Street / 7<sup>th</sup> Street corner by coming down Stower and work its way up onto the Highway 59 north route. I think that traffic needs to continue to be routed down Main Street, or for that matter around the Interstate and brought off on the interchange.

But I would express that I have a trust in my public officials and I have a trust in the employees of our City and our State government in the design of this project, to do it right so it is to the benefit of all and not just those within the local neighborhood. Whenever I want to make a trip out to Albertson's or Stephan's Hardware Store, or County Market, or Wal-Mart, I have to make my way around Comstock or I have to work my way through the college to get there. And I am, like a lot of other people to the west of Strevell who have difficulty in being able to access those businesses out on that end of the community and this would solve that issue.

Q: (Don Michael) We've owned a home on Stower for 33 years. One thing bothers me, the statement was made that this plan for these projects was made by a plan between the City Council and the residents and people of Miles City. It's funny, in all the years I've lived there and everybody that lives around me, no one has ever approached me. Am I nobody or somebody you forgot about? I don't quite understand that.

Another thing, this gentleman is worried about his business. Main Street is Main Street like in any other city or town. I kind of feel that the businesses that build on these streets build there for a reason, because of the visibility of the people going by. So do they feel these people should not be going by the business any more? Is that the thing? I never thought about that until I heard this gentlemen's concern.

Q: (Pat Conley) I think the gentleman was talking about the fatality accidents as a scare tactic. Because it is not going to bring that much more traffic to town, it is going to disperse it. We don't have a lot of fatalities now on the busy streets and this is going to make some streets less busy and some a little more busy but it is not going to bring tons of people to town. I do believe people are still sensible and we still have our police enforcement, and I think it will open up. No one asked for all the building to happen out on Haynes. It has happened and I think we need to deal with it. Everybody wants Miles City to grow or at least a lot of people did want Miles City to grow, some of us maybe didn't but we have to deal with reality now. I think that dispersing the traffic will help a lot and help improve both downtown and Haynes Avenue – taking the traffic and getting the people from out of town from one place to another.

Q: (Kathy Doeden) I'm on the Planning Board where some of this started. You can't believe how difficult it is to get people to come to our hearings when we are trying to get

public input. I think everyone waits until plans have been made and then you get a big crowd like we have tonight. So I hope that all of you will watch for notices of public hearings and get there earlier on some of these other topics. But since this has gotten this far, I didn't know if you were aware but the Environmental Impact Statement states that we have plans for ... (inaudible) ... through the city. That's for several purposes: one being safety, and one was to eliminate traffic. This as a continuous .... (inaudible) ... on this network that we are trying to put together. It is difficult to do it all at once.

Having it all on paper makes it possible to add projects as they come along. One benefit is that it eliminates traffic and moves some of the people around to the public places on bicycles. Then you are going to cut down on your traffic on your streets. I personally feel that Stower could be left the same width and include sidewalks. I do believe that having narrower streets that aren't just straight thoroughfares can eliminate serious accidents. I believe that our statistics show that fact. Wider streets just encourage people to go faster. If you left the street the same width it is now, that would accomplish what your other traffic slow down bulb-outs do and still retain the neighborhood ambience that everyone is concerned about. That is what makes a community a community. That's what identified us. We don't want to look like every other community. I don't know if that is a possibility. It would also eliminate more drainage. If you are adding more blacktop, you will have more water draining off and it would eliminate some of the drainage problem that some people have indicated they are concerned about.

Q: (Kristin Kenyon) Ray, didn't you ask the City about that and they want two shoulders?

A: (Ray Mengel) ASHTO standards call for eight-to-eleven feet, we settled for 9½ so we split the difference. I can tell you that Cities like Sidney, for example, if you went up and talked to the town of Sidney they would tell you that whatever you do, don't build an eight foot parking lot. They are now in the process of starting their own economic development project to try and get that eliminated on Central Avenue. It is such an impact to those people trying to park there with the vehicles going by. It is a safety issue. They have had all kinds of accidents with those narrow shoulders. They are in the process of changing Central Avenue to go out to a wider parking lot.

Q: (Katherine Doeden) I'm not really familiar with Central Avenue in Sidney but I see this as a residential neighborhood not a commercial neighborhood. I think it is important to our community to retain that sense of community. Providing pedestrian pathways is something I think Miles City really needs to do. I am pleased that we at least have that on paper and I would like to see more of them actually created since I'm a pedestrian. So if you could leave the street the width it is or close to the width it is, retain the trees, and still be able to do a continuous kind of a sidewalk, you would accomplish three things: (1) you would slow down traffic, (2) retain the neighborhood ambience, and (3) you might even save money.

Q: (Bill Raschlikow) I live at 509 South Sewell. I am going to address the issue of accidents. I've lived on that street for 28 years now and at any given time during the year there is as least 3 to 5 accidents happening on the corner of Stower and Cale. On a number of occasions, the cars have been in the school lot. On some occasions, cars have been in the residential front yard. At one time there was a car sitting on the church lot. That is one of the issues I brought up.

The next issue is when they make Stower wider, Sewell being a one-way street, I fear parking my car in front of my house because people do not know how to read one-way signs. On any given day you will see 10-12 cars come down Sewell the wrong way. Can we have it patrolled?

A: (Pat Rogers) Ray has brought up the fact that the City made the request for these particular streets. We have set priorities as far as our urban funds go and these are what our priorities are. I've been working on this project as far as the Stower Street intersection since 1986 when our first recorded action on the City/County Planning Board was taken. So it has been in the making for quite some time. I really appreciate everyone coming to his public hearing tonight on behalf of the City. I especially appreciate these ladies and gentlemen that have all the credentials that are helping with this project. I know the undeveloped property right here (referring to graphic) at some point sooner or later will be developed. It has always been my concern and others' concerns that have been at public hearings of the impact what is going to have to this particular neighborhood. With this urban project, as you can see we are able to address a lot of the questions and concerns that you and your neighbors have and the community has. Without the fact that this is an urban project that we are able to spend urban monies on, we wouldn't be able to build in a lot of the safety factors. So I really appreciate that fact. I know once again there are concerns about the church, there are concerns about the schools, and Ms. Morris brought a great sidewalk presentation that she has put a lot of effort into. I think we are really blessed as a community to have urban monies to spend on the design of these projects so we can address the neighborhood concerns, the community concerns, and build in our safety factors. Thank you.

Q: (Janet Kelly) I am one of the property owners along Stower who will be impacted. I moved into a neighborhood, a quiet residential neighborhood with good neighbors, not a lot of traffic, lovely trees. We hear birds in the morning. I live in a community unfortunately in southeastern Montana that has experienced no growth whatsoever. My property and my neighbors will have profound impacts with the Stower Street project. I feel very, very sad that my neighbors do not appreciate the impacts to me and my neighbors just for the benefit of them getting to Wal-mart five minutes faster, by widening the streets, providing two parking lanes, when no one has bothered to ask anybody that is a resident how we feel about an extreme widening of the street. Make no bones about it, this will become the new thoroughfare to move traffic in Miles City from east to west. You can tell me it isn't, but that is a fact. It will have a profound impact to



this community. It will no longer be a quiet neighborhood. It will be forever changed and it will be the new Main Street. I would appreciate it if somebody would address the noise impacts to us as residents because of the higher traffic volumes. There was some mention in the EA that there would be another follow-up report, and I am interested in finding out the status of it and if it is completed to share that with us.

A: (Kristin Kenyon) We are actually waiting to hear the outcome of this and then Jake and I will get together and we will keep you posted if that is ok.

Q: (John Scheuering) I would like to ask when the comments were taken from the Main Street businesses with regard to this project?

A: (Kristin Kenyon) Comments from the Main Street businesses came in various assorted letters that I received from John Marks, the City Planner. There were some from the Chamber meetings, and some at Pat's public meetings and City Council meetings. That was before the last public meeting, February of 2002. I haven't seen any in the last two months.

Q: (Pat Rogers) We have heard a lot of comments this evening. I guess I would like to share some conversations at a meeting we had at City Hall. I'm speaking on behalf of the City. We would like to meet with the property owners along Stower Street because you are the ones who are most impacted. There are a lot of design changes that can be made. At the last public hearing we didn't really get your input as to what and how you would like the street designed. At that time it was pretty much the consensus of you as the adjacent property owners that you didn't want to see the street go through. We, the City, would like to sit down with you and work out the details if we can. We have an opportunity to spend urban funds on that street to build those safety devices in, as I said before. There are a lot of professionals here that we can get all kinds of input from and I guess if we had somebody on Stower Street that would like to coordinate the property owners and meet with the city officials, state officials, federal officials or whoever. I would like to encourage and ask that of you people along Stower Street. Thank you.

Q: (Sandra Anderson) I would just like to add that I'm very encouraged by this process. Pat's idea to have a meeting of the Stower Street people, I think is a positive step. I was encouraged by what Kathy Doeden said because there is something that does address all the concerns and I appreciate your being responsive to them. I appreciate Kristin understanding what Kathy was saying that it doesn't have to be this big honking industrial looking street, and it could be something that is tree lined, with maybe a bike path instead of it being so wide to get more people on bikes. The gentleman behind me was talking about property values, and that really is something that a bike path instead of this industrial looking interstate going through there – there might be a balance somewhere in between. I think we are only beginning to start to hit that balance and I want to encourage the group to keep going. Kristin if you can come to the meeting with

the Stower Street people because I think you would get their concerns. I appreciate Pat bringing that up and all of you being so responsive. It is just encouraging and I just encourage the group to keep doing this. I think there are places where the circles all join but I think it is going to take some more work to get there and I think we are just starting.

- Q: (Amorette Allison) I'm wondering if the only reason that – if you are an older generation Stower or a younger Stower, as the City Historical Preservation officers, I've discovered there is a generational break in the pronunciation of the street and I have no idea why. The reason that project was chosen was because Wal-mart paid for half that street light and if Wal-mart had been two blocks up we would then be going down Comstock, if it was two blocks the other direction. Is it because Wal-mart coughed up the money for the street light so therefore we feel like we have to push the street through because of those street lights that Wal-mart so graciously paid for?
- A: (Pat Rogers) Well, the first conversation or discussion in a public forum about Stower Street going through was done when Haynes Avenue was constructed. At that time the Department of Transportation wanted to know from the City County Planning Board where we wanted our T intersections – where we wanted to have our streets intersect onto Haynes Avenue.
- Q: (Amorette Allison) You mean when Haynes Avenue was first constructed?
- A: (Pat Rogers) When it was reconstructed in the mid-80's. Wal-mart wasn't even thought about then.
- Q: (\_\_\_\_\_) Does this coincide with the 1984 EA?
- A: (Pat Rogers) I'm not sure.
- Q: (\_\_\_\_\_) When the discussions first started was about 19 years ago.
- A: (Pat Rogers) I'm referring to the City County Planning Board minutes.
- Q: (Karen Morris) They appear in the EA, in Appendix A. I only know that because I made an effort to read the EA.
- Q: (Pat Rogers) There is a clarification I should make in my invitation to the property owners along Stower Street. I don't mean to change any decision the City Council has already made. They have made a decision on the street width, the location of the sidewalks, and different items, but those items can be changed by meeting with the City Council. For example, the location of sidewalks by Mr. Hartman's house and the adjacent property owner. I don't mean to indicate that the total project would be, could be, or should be changed by the neighborhood meeting and the City Council. There has

never been any conversation up to this point, for example, of having bike paths on Stower Street or any of the streets on this project. That is just a matter of clarification.

Q ( ) Is there any chance they would ever consider just having one lane, one shoulder possibly, or some modification. Would they be willing to do that?

A: (Pat Rogers) What I got from the City Council this afternoon is that they are open and they would like to meet with the property owners about certain design criteria.

Q: (Janet Kelly) What is the purpose of this public hearing? I thought it was to hear from the public. What you just said was the project has been decided and we really are going through an exercise of futility? Or did I misunderstand what you just said? You said the City has decided what is going to be done, but you would be willing to meet with us? I don't understand. What is the purpose of tonight's public hearing?

A: (Darrin Grenfall) We are going through the NEPA process right now. That is the National Environmental Policy Act. What we have done is to come to public with a document that proposes certain conceptual design features for each one of these streets. If those features are not agreeable to the City, which I felt they were, then we are confused. I guess I didn't understand that today. I thought we were sure from the City Council and we have them on record as saying that for Stower Street we were talking about two 12-foot lanes, and a 9½ parking lanes, and certain specific areas for sidewalk. Now if we are saying that is not what the city is agreeable to, then we are in a state of confusion and we have to go back and revisit that. That is why I'm asking Pat to clarify that.

A: (Pat Rogers) As far as the street section goes, we want to stay with the street section we have agreed to. We have City Council minutes backing that up. As I said before, at the last meeting we got a lot of input from the people along Wilson Street, and therefore the decision was made on a particular street section – the width, the sidewalks. That has never been done on Stower Street. The City Council has done that for you because there was no input there. That is what your representatives are for.

Q: (Patrick Kelly) That is just plain bunk!

A: (Pat Rogers) You were at the meeting.

Q: (Patrick Kelly) I was at the meeting and you had plenty of input. To say that you got no input from the citizens that live along Stower is just plain wrong!

A: (Pat Rogers) Mr. Kelly I'm sorry – no input on the conceptual design.

Q: (Patrick Kelly) You got direct input of “no build.” We've never been consulted on a

realistic basis on the details as Mr. Hartman said. These meetings are structured, we cannot protest this thing unless we show up at these meetings and protest it or interrogate the thing to show the weaknesses of the plan. I'm not against sitting down with the City. I said last time I wanted to be part of the solution, but I don't want to hear that a decision was made on my behalf or for me. I don't want to hear that on two of the projects the people voted and we are not going to be allowed to vote on this one. I am not confused but I will not stand by and hear someone say they got no input. There were a tremendous number of people at that meeting and you got a tremendous amount of advice. There was no Main Street input at that meeting. So for the record, we have not been consulted because you knew what the response would be. And the suggestion of the changes – calming ideas, speed it up and then slow it down, sounds as ludicrous as it should. The constructing suggestion from the City Planning Board members here is to keep it the same width, but you are saying the City Council and your office would never reconsider that. Then I'm not saying I would consider it but if we have a meeting, that might be something to put on the table. What has been shown here tonight is that the report is incomplete. It does have to extend all the way downtown and since we have now identified downtown as a big factor in supporting this as it gets to the neighborhood, then maybe we better get focused on who the parties are that have an interest in this thing. But don't tell me that we have not made suggestions. I've been part of the dialogue since I first heard about it.

As far as the street light on Haynes, the first time I heard a member of this City Council say that the street light determined the project, I thought I had landed in Looney Tune Land, but that is exactly what was said at the March 2002 meeting – that the streetlight determined this. Since we didn't realize the impact the streetlight would have on our neighborhood, it was tough luck. That was a statement from at least one member of the City Council who voted in favor of the project. Well, we got the streetlight, I don't consider it a conspiracy by Wal-mart, I consider it poor planning. The state says we can't do anything because the City has determined it. Our frustration is that we do not see the grand plan. We see a lot of quiet meetings by the Planning Board. I've been to some of those and on every occasion where I knew there was an impact on Stower, I've appeared and I've made my argument known and I've made my questions known, and there seemed to be little argument. At those meetings there was no plan that we could comment on.

And Mr. Federal Highway Man, I would like you to know that your process is in error. This City cannot certify that they have met the requirement of the federal statutes and the code of Federal Regulations. No plan was presented to the public to comment on at those meetings, which may or may not have been certified to you.

A: (Pat Rogers) I'm clarifying again that the typical section for the street design on Stower Street has been made by the City Council. We would like to review that with the property owners along Stower Street. That is my statement. Thank you.

Com: (Jim Haggerty) Just a short comment. I live on Comstock and from experience I can tell you that if they run Stower straight through without widening it, people that live on it will regret it in the future. I would be most happy if Comstock was wider.

Q: (Diane Rice) I think it should be noted that as I recall having been one of the few members of the public in attendance at the City Council meeting on March 20<sup>th</sup>, because we didn't have much notice, it was not a unanimous vote of the City Council this time. Is that correct?

A: (Pat Rogers) There was one in opposition.

Q: (Diane Rice) It was not a unanimous vote of the City Council. It was a majority, but not unanimous. The other thing that I don't think has really been made clear but was mentioned in the EA and is very definitely worth noting is that this project has been in the works for 19 years. The EA specifically indicates the public was allowed to have input for the last five years. What happened during the first 14 years? Why wasn't the public allowed during the period of time it might have made a difference? To me that is public involvement – it is involvement through the whole process – the ability to be informed and have your input when it really can make a difference.

A: (\_\_\_\_\_) Your question is in 1985?

Q: (Diane Rice) But nothing was really communicated to the public. The public wasn't allowed to have input until all these decisions and 14 years have passed. Perhaps the public might have had good ideas during the 14 years. Perhaps additional analysis of the impacts could have been done to see if it was a really good plan during those 14 years before it gets down to the last five years when we've got the idea set in stone and it is really too late for the public to be allowed to have worthwhile input.

A: (Kristin Kenyon) I might have the document ... (inaudible).

Q: (Diane Rice) You were accurate from the other information that I have and I have file boxes full.

A: (Kristin Kenyon) I like your point. I think we are all just trying to do our jobs and I'm sure that Pat was trying to do his job just as the City Council people try to do the best for their city, but maybe in the future we will have more meetings as this lady was saying. Maybe they had a meeting and nobody came. Then all of a sudden the plan is here.

A: (Kathy Doeden) I am on the Planning Board and I've been on the planning Board for those 19 years. I'm sorry that I sounded cranky about people not coming to the public hearings, and I'm really encouraged to see all the people here tonight. I think it is really

good for the people to be able to comment and I don't think it is too late. I don't want people to lose hope. I think we can really make a compromise here that will make everyone somewhat happy. I guess what is really difficult for the Planning Board and the people who are trying to work on these things, is it is really difficult to get people to come to the hearings when you are talking in generalities – when you are working on a long range plan. These are the meetings we have the most difficulty getting people to come to and these were probably the meetings where the beginning of this project could have been seen by the public. These meetings are advertised in the paper, as we are legally required to do. We even for one meeting, put a notice in every newspaper to everyone in the county as well as the people in the City. We spent \$600 printing up the notices to try and get comments on specific C-tap (sp?) projects to see what people wanted for this community. I don't know what the circulation was, but I believe we got 20 people at that meeting. So how many dollars per person did we spend? I'm just kind of expressing that frustration – how can we get this involvement earlier? Maybe something will come out of this exercise.

Q: (Brent Christopherson) I'm the Miles City Fire Chief. I would just like to say I support the 12-foot driving lanes and the 9½-foot parking lanes. There are many areas of the community, when we are trying to get somewhere in a hurry to help save a life, and somebody opens a car door. Like Mr. Mengel was saying they are contending with in Sidney, you are having to watch out for those people possibly opening doors into a narrower area where the engine or the ambulance needs to be getting through fast. That is another thing the fire fighters have to watch out for along with a narrower street. With the size of the trucks we have, certainly that is going to impede our progress of getting to somebody's home quicker. I would like to thank you guys for doing some planning and looking at the wider streets for emergency services. Thank you.

Q: (Ray Mengel) We are coming up on 9:30 and you can certainly stay a little longer if people want to. Maybe we will come to a close on this. We really appreciate all your comments this evening. I guess what we've heard this evening is that everybody is more or less happy with the concept on Strevell and Wilson, but not so keen on Stower. So there are some areas in the EA that we need to go back and address, so we agree to do that. How about if we close the meeting this evening and promise that the City and the Department and the Federal Highway Administration will come along and set up meetings with the property owners on Stower – specifically with those property owners and go through project design, design concepts, and things you would like to see in your neighborhood – something the residents along there and the City and the emergency services can live with and make work on Stower. We would probably set those meetings up, I would guess some time after the time period for the comments on the EA.

Let me ask you this, those of you who are in attendance at this meeting, would you prefer that it be an evening meeting, day meeting, afternoon meeting, because we can do any of those. And it would be helpful for some City Council people to be at that meeting.

- A: (Unidentified) I find for the City Council to attend the meeting, it is better in the evening.
- A: (Ray Mengel) Is everybody happy with that? Ok we will get together with the City and get a list of all the property owners along Stower who will be impacted by this project and send you a letter and invite you to those meetings and we can sit down and discuss all the design elements.
- Q: (Unidentified) Would that include residents west and east of the project boundaries?
- A: (Ray Mengel) That is a good question. The actual construction and the people who are impacted here (referring to graphic).
- Q: (Unidentified) Yes, but then you have the long-range impact on other areas too.
- A: (Kristin Kenyon) But then you can argue that it will have a long-range impacts on other streets, so then you open it up to the Comstock people, etc.
- Q: (Ray Mengel) How about for the time being we just confine those meetings to people who are actually going to be impacted with the construction on Stower? Is everybody in agreement with that? Ok.
- Q: (Linda Weedeman) I would like to request that people other than adjacent property owners be allowed at the meeting also. Some of the decisions that have been made on Comstock and Strevell have impacted my residence. I live on Stacy, which is two blocks from Stower and I would certainly like to be included. I've let the city know what has happened to me – it takes me three stops within a 3½-block period just to get to Stower in order to get to work in the morning. I'm firmly opposed to the speed bumps on Stower if it is widened. I would like to be included in that meeting.
- Q: (Charlee Morris) We came here in 1959 when we bought the house. When we moved there that street was gravel, there was no paving. I got out with a petition and we worked hard to get partial paving because people on Wilson Street were not interested, people down on Latton were not interested. They didn't want paving. They thought that one day the city would pay for it and we were foolish. Then when these things came, they built the school and they built a church and it just seemed like we couldn't find anyone to help with the planned ideas. At that time, Mr. Clark was on the Council from our area and the one thing he said, "get upper .... (inaudible) ... to build anything in this town." So we did, we attached the sidewalk, it is a wide sidewalk because of the school, and the thing that frightens me more than anything else is to see these small children going to school out there in the mud because we didn't have attached sidewalks. So we spent nearly 1½ years getting the cement just attached. Then when we attached it, the church attached theirs and they did it before we did and it worked out so well. I realize it is kind

of a jog to get from here to there and other places, but these sidewalks on the curb have a lot of advantages. You don't have the boulevard to keep up with and children don't walk out in the streets because they've got to walk through the grass to get to the sidewalk. So actually, I've seen a lot of accidents on that corner and I've seen a lot of accidents on other corners. But basically when the VA became a smaller entity, the accidents cut down because there were lots of people hurrying to get some place. Then we have a lot of kids too, we had one girl that was hurt very badly on the corner. It is speed, nothing more or less than speed. They used to come down Stower and back on Strevell and it was like a racetrack. Finally I got sick of it and I would call the police and tell them there was a game going on and ask them to come out and take a look at it. The street has a lot of problems up and down, but I don't see that it being a narrow street has contributed to any of the problems. Children going across it would cross at the ... (inaudible) ...

Then the other thing is what it does to my property. It is going to take off my driveway and I have a permit for that. Where do we put it? The City approved it. I can't understand why they approve things like this and then come along and chop it off. It will make a difference in our value. I'm interested. By the way, I came here from Glendive and that is a long ways and I will come again, and again, and again because I am interested. I would like to be involved in this meeting you are going to have.

Q: (Linda Melhoff) Just a quick question. Wilson Street was your number one priority, is that right?

A: (Ray Mengel) That was the City County selection.

Q: (Linda Melhoff) Do all these projects have to be let at once? Do the bids have to be let all at once? Is there a chance that Wilson will be done even if Stower isn't completed? I'm just looking at time.

A: (Ray Mengel) The reason they are tied together is because there are so many design elements that are the same. So if you separated this out, you will pay a higher unit price cost for items like concrete, paving, and those kinds of things.

Q: (Linda Melhoff) So it will all be done together? These three projects will be done at once?

A: (Ray Mengel) Yes, they will be done all together if we don't end up with the "No build" options.

## CLOSING

It sounds like everybody got to at least say something. Pat is going to work on setting up a



meeting with Ray for the Stower Street people in the next two months. The public comment period ends in approximately two more weeks. If you know people who did not get to attend the meeting tonight, please take extra comment sheets and hand those out to people. Then send your comments to us or we can take them now or you can send them to the address or drop them off at the MDT offices.

Q: (Unidentified) Regarding where to mail in comments, I noticed that there is a different address provided in the EA – it indicates to send them directly to Helena and this says to send them Glendive. I think that would be good to clarify. It would be good to also put the information in the newspaper so the general public is aware of it because a lot of people have indicated they were not fully aware of what was going on. Normally for a public meeting, there are three notices, but I only saw two for this one. A lot of people didn't know what was happening.

A: Both addresses are fine. Ok we will request that another notice will be put in the paper to alert people that they have until the end of the comment period. And we will clarify the address situation. Please take comment forms that you can mail back in.

Q: (Unidentified) Can you also send them to the radio stations because I went to City Hall and they knew nothing about it and I went to the Department of Transportation and they knew nothing about it?

A: I sent out emails to every media.

Q: (unidentified) I never received that.

A: Can you please write your name and email address down. Does anybody else want us to email a notice to you?

We are just thankful for all your input this evening. Even though there was disagreement we are in agreement that this is a good involvement and we really thank you for all your input and your comments. Have a good evening.

Meeting adjourned.

## **Appendix E:**

Traffic Data and Map compiled by MDT subsequent to Public Hearing



Custer County Sheet 2A of 5

Station Number	Route	Location Description	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
1	I-94	I-94, W of Tongue River Bridge	3070	3300	3010	4160	3550	3210	4200	4310	4240	4200	4810
2	I-94	I-94, W of BR-94/FAP 2 bridge	3050	2980	2860	3410	3210	3790	3690	2800	4250	3810	4790
3	I-94	I-94, E of BR-94/FAP 2 bridge	2840	2960	2500	3080	2920	2720	3100	2340	3290		
4	P-2	BR 94/FAP 2, N of I-94	1080	1200	1340	1270	1430	1370	760	1020	1290	1320	1400
5	P-2	Main, W of Tongue River bridge	2770	3020	3180	3300	3110	2830	2750	2500	1480	2470	2600
6	P-2	Main, W of 5th St	5730	5890	5890	5410	3430	2900	2450	2330	2410	4440	2710
7	P-2	Main, W of 7th St		7770	9450	6970	7280	7500	7740	7740	6050	5580	6260
8	P-2	Main, E of 8th St		12600	11150	9710	8840	9450	8310	10070	8340	7330	
9	P-2	Main, S of Prairie Av		14440	15840	10870	14810	14980	12420	13630	10750		11640
10	P-2	Valley Dr, N of Main	5580		5130	3930	3370	4300	320 low	2820	2520	4120	2770
11	P-2	BR 94/FAP 2, W of Strevell Av	4590	4640	4000	6290	3380	3130	3720	2800	3510	3520	3470
12	P-2	BR 94/FAP 2, W of Valley Dr-FAP 2 Int	3660	3560	3600	4070	3700	3600	3420	3380	3370	3490	3570
13	P-2	BR 94/FAP 2, W of I-94	1580	1470	1720	1280	1440	1750	1270	1160	1150	1250	910
15	P-18	7th St, N of Main	7620	8110	6930	5390	7500	5820	5520	4980	4990	4640	4820
16	P-18	7th St, N of Palmer	5060	5730	4960	4450	5810	4510	4850	4300	4280	4280	4090
17	P-18	7th St, N of RR tracks	6100	6130	5080	4430	5630	5590	4950	4740	4100	4380	4400
18	P-18	7th St, N of William	2710	2540	3080	3080	2990	2970	2760	2510	3370	2640	3180
19	P-18	7th St, N of Yellowstone River bridge		1880	2100	1920	2180	2090	2010	2130	2330	2020	2150
20	P-18	MT 59, N of Sheffield Rd	390	440	450	340	490	620	430	500	540	440	450
21	P-23	Main, E of Cottage Grove	9990	12120	11850	9010	10630	11420	7210	8410	8410	8480	10110
22	P-23	Main, E of Strevell Av	8030	7100	8470	7450	9150	10090	7640	8450	7430	7820	8390
23	P-23	Haynes Av, S of Main	8150	8440	8630	6700	10590	12460	11160	12160		11170	11750
24	P-23	Haynes Av, N of I-94 bridge	5610	6340	5960	7030	6400	8310	8240	9490	9170	8580	9900
25	P-23	MT 59, S of I-94 and Super 8 Motel		2900	3490	2900	3350	4000	3470	3210		2530	3850
26	U-8001	Washington, W of 7th St	920	820	690	1020	660	820	640	770	590	620	700
27	U-8001	Washington, E of 7th St	3530	4130	3050	2820	2300	2240	1980	1960	2060		1990
28	U-8001	Leighton Blvd, W of Montana Av	4570	4770	4760	4350	4000	3830	2850	3880	3450	4060	3620
30	U-8001	Leighton Blvd, W of Valley Dr E	7490	9060	8430	9030	5470	7220	7180		5080	6020	5070
31	U-8001	Leighton Blvd, E of BR 94/FAP 2	4220	3670	3980	5910	3850	3400	4130	3590	3760	3940	
33	U-8002	5th St, N of Bridge St	2680	2800	3050	1740	2250	1890	1880	2300	1680	1600	1590

Custer County Sheet 2A of 5

Station Number	Route	Location Description	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
34	U-8002	5th St. N of Main	1290	1860	1290	1320	1520	1150	1400	1150	1030	1200	1020
35	U-8002	5th St. N of Orr	870	660	740	520	560	520	540	780	620	600	600
36	U-8003	Pleasant. W of 7th St	2800	2830	2600	2440	2130	1920	1920	1890		1970	1580
38	U-8004	Montana Av. S of Main	1970	2220	2120	1710	1560	1640	2220	1200	1250		1260
39	U-8004	Montana Av. N of Main	4230	4660	4890	5750	4320	4390	4990	4190	3880	3520	3870
41	U-8004	Montana Av. N of Gordon	6660	5790	4910	5920	3580	3300	4250	3620	3580	3210	3250
42	U-8004	Montana Av. N of Lincoln		1720	1190	1570	1440	1370	1320	1470	1690	1670	1460
44	U-8005	Bridge St. E of 7th St.		4030	3670	3320	2950	3400	3990	3160	4010		3650
46	U-8006	Strevell Av. N of Wilson	2090	2020	2460	1850	2580	2940	2710		2600	2840	2920
48	U-8006	Strevell Av. S of Bridge St	3150	3890	3210	3350	2440	3300	4650	2530	2440	2010	2230
49	U-8006	Strevell Av. N of Palmer	2000	1490	1890	2180		1350	1690	1220	1170	820	1040
50	U-8007	10th St. S of Bridge St		3710	2800	2750	2600	2110	2850	4630	1980	2560	2860
52	U-8007	Pearl. W of Strevell Av	1210	1060	940	870	1090	1010	1080	1310	900	1190	1120
54	U-8008	Haynes Av. N of Leighton Blvd	2170	1810	2150	2770	2320	2360	2480	2610	3510		
55	U-8008	Haynes Av. S of BR 94/FAP2	1100	1600	1830	1740	1710	1920	1730	1660	1930		
56	U-8009	8th St. N of Main		2570	2200	1810	1910	2190	1880	1980	1670		1960
57	U-8009	8th St. S of Pacific Av	4540	4520	4780	4570	3340	3730	4240			2950	1510
58	U-8009	Stower. E of Prairie Av	2790	2580	4070	3910	2370	2570	2640		2230	2150	2490
59	U-8009	Stower. W of Strevell Av	1930	1960	2000	2600	2390	2020	2230		1430	2060	
60	OS	Comstock. E of Strevell		3050	2100	1940	2780	2470	2270				
61	OS	Comstock. W of Haynes Av		1720	2280	2470	2550	1960	2230				2160
63	OS	Valley Dr. E of RR tracks turnout		1320	1580	1720	1300	1300		1210	1410	1510	2020
64	OS	Railroad Tracks Rd. N of Valley Dr E	1550	1280	1540	1370	860		820	1270	980	1090	1380
65	OS	Lake Av. N of Riverside				1060	100	170		150	210		1450
66	OS	Center. Av. S of Dickinson		500	420	370	320	360		310	310	460	350
67	U-8013	Wilson. W of Haynes Av	1290	1130	1090	1400	1350	1410	1410	1410	1430	1370	1430
68	OS	Tomp. W of Strevell Av		2330	1440	1560	1500	2010		1940	1880	1510	1480
69	U-8008	Haynes Ave. btwn Pleasant & Palmer	4870	4310	5020	4820	4500	4500	4890	4950		4720	5590
70	U-8001	Leighton Blvd. btwn Strevell & Stacy Av	3650	3820	3330	4600	3940	3480	3480	4090	3470	4660	4570
71	U-8001	Leighton Blvd. W of Sioux Av	2320	2920	2590	3150	3250	2890	2770	3490	3000	2990	3340

Custer County Sheet 2A of 5

Station Number	Route	Location Description	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
72	U-8003	Pleasant, btwn 7th & 8th				2980	2790	2510	2530	2760	2550	2380	2380
73	U-8003	Pleasant, W of Montana Av				1480	1450	1300	1600	1580	1820	1970	1970
74	OS	Lake Av, btwn Riverside & Lincoln	1250	1200	1130	1340	1090	850	850	1310	1210	1030	970
75	U-8006	Strevell, at south city limits				620	1270	950	700	1700	610	1620	1230
76	U-8006	S Strevell; just W of MT 59				380	410	400	470	480	530	680	460
77	M-5777	Stower St, E of Strevell							2200	410	440	570	
78	M-5777	Stower St, W of MT-59								2260	2040	2410	2830

## **Appendix F:**

Environmental Assessment – March 3, 2003

# Environmental Assessment

## Miles City Street Projects

March 03, 2003

Wilson Street  
STPU 8013(1)  
Control No. 4362

Stower Street  
STPU 8009(2)  
Control No. 4363

Strevell Avenue  
STPU 8006(1)  
Control No. 4361



Prepared for



Prepared by



DAVID EVANS  
AND ASSOCIATES INC.

1331 17th Street, Suite 900  
Denver, Colorado 80202



# Environmental Assessment

For the Miles City Street Projects:

**Wilson Street**  
STPU 8013(1)  
Control No. 4362

**Stower Street**  
STPU 8009(2)  
Control No. 4363

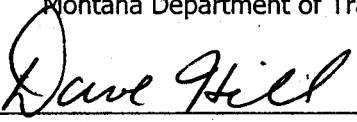
**Strevell Avenue**  
STPU 8006(1)  
Control No. 4361

in Custer County, Montana

This document is prepared in conformance with the Montana Environmental Policy Act (MEPA) requirements and contains the information required for an Environmental Assessment under the provisions of ARM 18.2.237(2) and 18.2.239. It is also prepared in conformance with the National Environmental Policy Act (NEPA) requirements for an Environmental Assessment under 23 CFR 771.119; and Section 4(f) of the U.S. Department of Transportation Act under 23 CFR 771.135.

Submitted pursuant to 42 U.S.C. 4332(2)(c), 49 U.S.C. 303, Sections 75-1-201 & 2-3-104, M.C.A. and Executive Orders 11990, 11988, and 12898 by the  
U.S. Department of Transportation, Federal Highway Administration and the  
Montana Department of Transportation

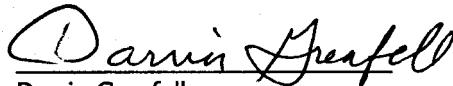
Submitted by:



Dave Hill  
Montana Department of Transportation  
Environmental Services

Date: 4-07-03

Reviewed and  
Approved for  
Distribution:



Darrin Grenfell  
Federal Highway Administration

Date: 4/1/03

The following persons may be contacted for additional information concerning this document:

Jean A. Riley, P.E.  
Engineering Section Supervisor  
Montana Department of Transportation  
2701 Prospect Ave., PO Box 201001  
Helena, Montana 59620-1001  
(406) 444-9456

Darrin Grenfell  
Operations Engineer  
Federal Highway Administration  
2880 Skyway Drive  
Helena, Montana 59602  
(406) 449-5302

# **Miles City Street Projects Environmental Assessment**

**Wilson Street  
STPU 8013(1)  
Control No. 4362**

**Stower Street  
STPU 8009(2)  
Control No. 4363**

**Strevell Avenue  
STPU 8006(1)  
Control No. 4361**

**March 3, 2003**

**Montana Department of Transportation  
Federal Highway Administration**

**In coordination with:  
The City of Miles City, Montana  
Montana State Historic Preservation Office  
U.S. Fish and Wildlife Service**

## **Abstract:**

The three proposed urban street improvement projects would involve minor widening in order to repave street surfaces and add new curbs, gutters, and sidewalks along portions of Wilson Street, Stower Street, and Strevell Avenue. The purpose of the three proposed projects is to bring the conditions of the streets up to standard and to improve vehicular and pedestrian travel movement in the surrounding neighborhood and in the City overall. Improved drainage facilities would also be provided with all three projects. Most of the improvements would occur within City-owned right of way.

The Stower Street proposed project would include an additional element—the construction of new roadway with curbs, gutters and sidewalks between Sewell Avenue to Moorehead Avenue. This new construction would require the acquisition of a portion of vacant private property for the length of two blocks to connect the eastern and western portions of Stower Street. This connection has been called for in City plans as essential for improving traffic circulation in the City and reducing congestion on other heavily traveled streets.

This Environmental Assessment presents conceptual descriptions of the proposed projects along with the anticipated effects these proposed projects would have on the natural, physical and social environment.

**Table of Contents**

**1.0 PURPOSE AND NEED..... 1**

1.1 REPORT OVERVIEW ..... 1

1.2 PURPOSE OF PROPOSED PROJECTS ..... 1

1.3 DESCRIPTION OF PROPOSED PROJECTS ..... 1

*Wilson Street* ..... 1

*Stower Street*..... 4

*Strevell Avenue* ..... 4

1.4 NEED FOR PROPOSED PROJECTS ..... 4

*Improving Travel Movements* ..... 4

*Improving Roadway Deficiencies*..... 5

*Improving Safety*..... 6

*Improving Stormwater Drainage* ..... 6

**2.0 ALTERNATIVES ..... 11**

2.1 DEVELOPMENT OF ALTERNATIVES ..... 11

2.2 NO BUILD ALTERNATIVES..... 11

*Wilson Street* ..... 11

*Stower Street*..... 12

*Strevell Avenue* ..... 12

2.3 BUILD ALTERNATIVES ..... 12

*Wilson Street* ..... 12

*Stower Street*..... 14

*Strevell Avenue* ..... 15

**3.0 IMPACTS ..... 16**

3.1 EFFECTS ON THE TRANSPORTATION SYSTEM..... 17

*Access and Traffic* ..... 17

*Pedestrians & Bicycles*..... 19

*Parking*..... 19

3.2 EFFECTS ON THE COMMUNITY ..... 20

*Community Resources*..... 20

*Land Use* ..... 23

*Right-of-Way and Relocations*..... 24

*Noise*..... 25



*Visual Impacts*..... 25

*Local and Regional Economics* ..... 26

*Environmental Justice - Executive Order 12898/Title VI* ..... 27

*Cultural/Archaeological/Historical Resources* ..... 28

*USDoT Section 4(f)*..... 30

*Parks and Recreation/NL&WCF – Section 6(f)*..... 30

**3.3 EFFECTS ON THE NATURAL & PHYSICAL ENVIRONMENT** ..... 30

*Floodplains (E.O. 11988)*..... 30

*Water Quality*..... 31

*Wetlands (E.O. 11990)*..... 32

*Biological Resources* ..... 33

*Threatened and Endangered Species*..... 34

*Farmlands*..... 35

*Irrigation* ..... 35

*Air Quality*..... 36

*Contaminated Sites/Hazardous Materials* ..... 36

**3.4 SECONDARY AND CUMULATIVE IMPACTS** ..... 37

**3.5 CONSTRUCTION** ..... 37

*Utilities*..... 37

*Other Actions Required* ..... 38

*Permits Required*..... 39

**4.0 COMMENTS AND COORDINATION**.....**40**

4.1 AGENCY CONSULTATION ..... 40

4.2 COOPERATING AGENCIES ..... 40

4.3 PUBLIC INVOLVEMENT ..... 40

4.4 OPPORTUNITIES FOR COMMENTS ..... 42

**5.0 LIST OF PREPARERS** .....**43**

**6.0 DISTRIBUTION LIST**.....**44**

FEDERAL AGENCIES..... 44

STATE AGENCIES..... 44

LOCAL AGENCIES..... 44

**APPENDICES**



## 1.0 Purpose and Need

### 1.1 REPORT OVERVIEW

The Montana Department of Transportation, City of Miles City and Custer County are proposing three roadway rehabilitation projects for Miles City including:

- Stower Street, Control Number 4363, STPU 8009(2)
- Wilson Street, Control Number 4362, STPU 8013(1)
- Strevell Avenue, Control Number 4361, STPU 8006(1)

This Environmental Assessment presents conceptual descriptions of the proposed projects along with the effects these proposed projects are anticipated to have on the natural, physical and social environment. This Section provides the purpose and brief descriptions of the proposed projects, in addition to the needs the proposed project would fulfill for the Miles City community. Section 2 describes the design of the proposed projects (the Build Alternatives), in addition to the No Build Alternative. The environmental documentation and analysis for all three projects is provided in Section 3. Finally Section 4 provides a summary of the comments and participation of the community residents and stakeholders and affected agencies received through the project process.

### 1.2 PURPOSE OF PROPOSED PROJECTS

Miles City is located in Custer County along Interstate 94 at the confluence of the Yellowstone and Tongue Rivers. Figure 1 shows the location of Miles City in relation to the state of Montana. The proposed projects are all located in the southeastern portion of Miles City, between Main Street and Interstate 94. The proposed projects are urban street improvement projects, which would involve minor widening in order to repave street surfaces and add new curbs, gutters, and sidewalks along portions of Wilson Street, Stower Street, and Strevell Avenue. Figure 2 shows the location of the three projects in the City. *The purpose of the three proposed projects is to improve vehicular and pedestrian travel movement in the City and surrounding neighborhood, while also bringing the conditions of the roads up to standard.* Improved drainage facilities would also be provided with all three projects. General project descriptions are provided below, and photos of the three project corridors are provided at the end of this section. Specific elements of the three projects are described in more detail in Section 2.

### 1.3 DESCRIPTION OF PROPOSED PROJECTS

#### ***Wilson Street***

A safer road and improved driving surface is proposed for a section of Wilson Street. The project would begin at the intersection with Strevell Avenue and Wilson and extend east 0.8 km (0.5 miles) to Haynes Avenue. The roadway would be widened to 13.02 m (42.7 ft) to include parking lanes, measured from face of curb to face of curb. The surface would be rehabilitated and new curb and gutter would be added. A new enclosed stormwater drain facility would be installed to replace the existing exposed ditch along the south side of the street. A new continuous sidewalk would be added between the new stormwater facility and the south edge of the street.

Figure 1. Project Vicinity

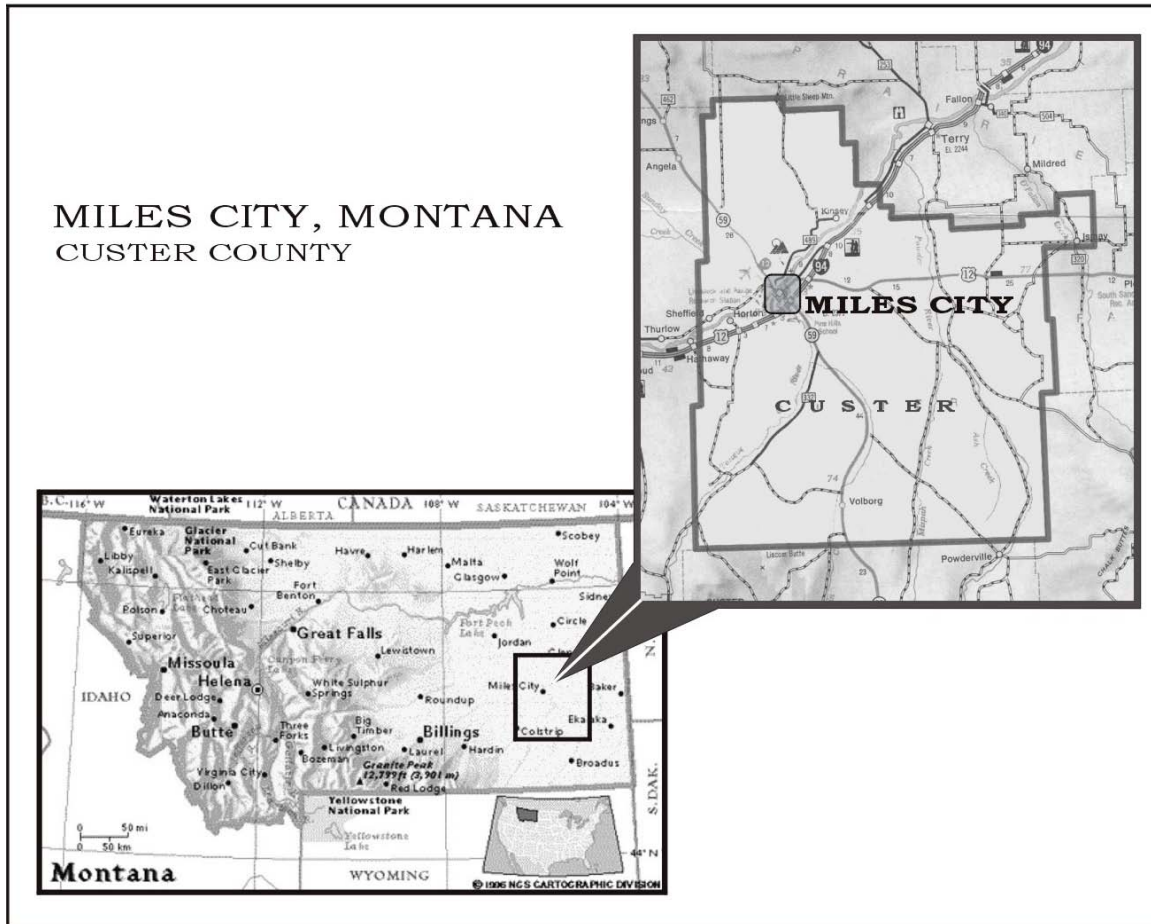
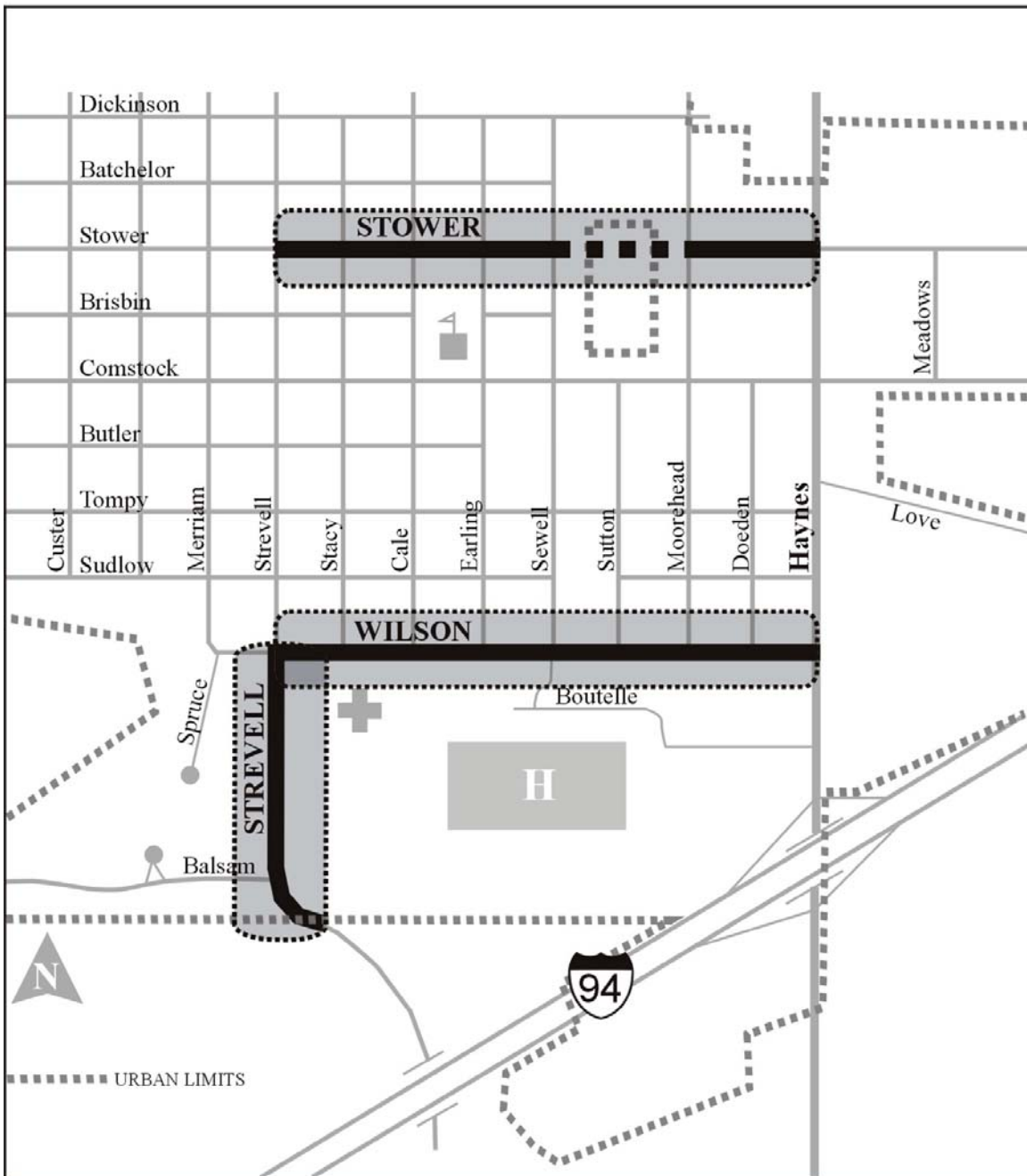


Figure 2. Miles City Proposed Projects



## ***Stower Street***

The Stower project would extend east 0.8 km (0.5 miles) from Strevell Avenue to Haynes Avenue. It would be composed of three sections: the western section from Strevell to Sewell; the middle section from Sewell to Moorehead; and the eastern section from Moorehead to Haynes. In both the eastern and western sections, the roadway would be resurfaced. The western section would be widened and would include the addition of new curb, gutter and continuous sidewalks along both sides of the street. Currently no road exists in the middle section between Sewell Avenue to Moorehead Avenue. A new road would be constructed in this section with curbs, gutters and sidewalks along both sides. This new roadway construction would connect the western and eastern sections of the existing Stower Street to each other. This middle portion would necessitate acquiring new right-of-way for a length of 0.2 km (0.12 mi). The roadway width for the western and middle sections would be 13.02 m (42.7 ft), while the roadway width for the eastern section would remain 14 m (45.9 ft) wide. Roadway widths are measured from face of curb to face of curb.

A new stormwater detention pond would be added in the middle section. It would be located off of Stower Street, between Moorehead and Sewell Avenues. It would be rectangular in shape and would measure approximately 6 m (20 ft) wide by 9 m (30 ft) long, though the exact measurements would be determined during final design. It would be surrounded by a six-foot chainlink fence, and landscaped with native vegetation.

## ***Strevell Avenue***

A safer road and improved driving surface is proposed for a section of Strevell Avenue. The Strevell Avenue widening project would begin at the intersection with Wilson Street and would extend south 0.4 km (0.24 miles) to the urban limits of Miles City. The roadway would be widened to 10.16 m (33.3 ft), measured from face of curb to face of curb. All surfacing would be rehabilitated and a new curb, gutter and sidewalk would be installed along the east side of the street to encourage pedestrian access and improve drainage.

## **1.4 NEED FOR PROPOSED PROJECTS**

The need of the proposed projects is to improve travel movements, roadway conditions, and vehicular and pedestrian safety within the City, as is described in more detail in this section. This section describes how each of the proposed projects are anticipated to meet these needs of the Miles City community.

### ***Improving Travel Movements***

Transportation planning is an ongoing process for Miles City and Custer County. Urban street projects are one important element of the Miles City transportation planning efforts. For the last five years, Miles City staff and elected officials have been identifying their plans to reduce traffic congestion and improve circulation patterns in the urban area for the community. The City's goals and traffic plans have been discussed at past City Council meetings and other public meetings, dating back to 1984 (Appendix A provides copies of these meeting minutes). Specifically, the City has cited the need to alleviate the increasing traffic congestion on Haynes Avenue and Main Street and the need for improving east-west connectivity. The City has taken



other steps toward implementing this plan including installing a new traffic signal at Stower and Haynes and replacing the four-way stop at Main and Strevell with a two-way stop. The City has also identified that making improvements within City-owned right-of-way to such streets as Stower, Wilson and Strevell would be an effective and low-cost means to improve transportation patterns in the city. The proposed projects would provide local and regional drivers with better access to such main arterials as Haynes Avenue and would help alleviate the congestion on other adjacent local streets.

### **Wilson Street**

The Wilson Street proposed project would not include construction of new roadway segments and is not anticipated to significantly change existing traffic patterns. However, the Wilson Street improvements would improve pedestrian facilities and roadway conditions for vehicles traveling to the Holy Rosary Health Care medical center and the Haynes Avenue commercial corridor.

### **Stower Street**

Of all three projects, the Stower Street proposed project is anticipated to improve circulation for the City overall the most. By completing the missing section of Stower Street between Moorehead and Sewell Avenues, Stower would provide direct access to the commercial development along the Haynes Avenue corridor. This connection would alleviate the existing traffic congestion along Main and Haynes by providing a more direct route to these two corridors. The Stower Street connection would also improve direct access for emergency vehicles that currently use neighborhood streets to travel to the Holy Rosary Health facility. Stower Street improvements would also serve college and Veterans Hospital traffic, thereby providing some relief to Dickinson Street, a large carrier of college traffic. Dickinson, east of Sewell, is an area with a higher incidence of pedestrian/vehicular conflicts due to the college buildings in the vicinity. Therefore, development of the Stower Street link may assist in reducing the traffic hazards on Dickinson in the college area by providing an alternative route to access the college.

### **Strevell Avenue**

The Strevell Avenue proposed project would not include construction of new roadway segments and is not anticipated to change existing traffic patterns. However, the Strevell Avenue improvements would improve driving conditions to access two cemeteries and several rural subdivisions to the south.

## ***Improving Roadway Deficiencies***

The condition of the existing pavement on the three roads is poor and will require repaving regardless of the proposed projects. Also, the existing streets currently do not meet MDT design criteria for a level of service (LOS) B for local urban streets. The present paved surfacing width for the existing streets is approximately 7.92 m (26 ft) compared to MDT's standard of 8.4 m (28 ft) for urban roadways. In addition, the current streets provide little if any room for pedestrian activity, with partial sidewalks provided at best. In many places a 0.3 m (1 ft) shoulder is provided, while the MDT standard shoulder width for this type of roadway facility is 0.6 m (2 ft). The three proposed projects would retrofit the streets to meet MDT standards. The proposed projects would bring the streets up to standard, along with making them consistent with other improved roads in the urban area. For example, the Strevell Avenue proposed project would improve Strevell south of Wilson to match the dimensions of the existing improved Strevell

Avenue north of Wilson. Resurfacing and improving the overall condition of the roads would also assist in reducing long-term maintenance costs of the streets.

### ***Improving Safety***

MDT conducted an accident analysis for the proposed projects in August 2000. The reports of recorded accidents that occurred in the proposed project corridors from 1997 through 1999 listed in the following table were reviewed. An engineering study evaluation was not performed because detailed accident analysis data and statewide average accident rates were not available for Urban Routes within city limits. The majority of these accidents occurred at intersections of the project streets. The improvements associated with the proposed projects are anticipated to assist in reducing accidents at intersections as sight distances would improve at these locations with the widened streets and shoulders.

#### **MDT Recorded Accidents for Stower, Wilson and Strevell**

<b>Street Name</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>
Wilson Street	1 accident	2 accidents	1 accident
Stower Street	1 accident	7 accidents	3 accidents
Strevell Avenue	2 accidents	0 accidents	1 accident

*Source: MDT, 2000*

Pedestrian safety is a notable concern as the existing project corridors include limited, if any, continuous sidewalks. As few continuous sidewalks are provided, pedestrians currently must walk along the edge of the roadways, creating an unsafe condition and the potential for vehicular conflict. A key element of the proposed projects is the inclusion of new, standardized sidewalks along all three proposed project corridors, which would reduce the safety risk to pedestrians associated with the existing conditions.

Currently, little to no designated parking is available along the three corridors. The proposed projects would provide designated parking locations and identify restricted parking conditions. Under existing conditions, there is insufficient room for two lanes of traffic to pass each other when cars are parked on both sides of the street. Designated parking spaces would remove this hazard, as well as provide room for people to safely enter and exit their parked cars, while traffic passes.

Safety would be enhanced by other elements of the proposed projects as well. Drivers would be better able to see and react to pedestrians and bicyclists due to widened travel lanes and shoulders. Safety would be improved by the addition of curb and gutters as they would define designated access locations onto the streets better. Currently vehicles enter traffic flows indiscriminately. Providing curb cuts to designate access improves driver expectancy. Finally, the three proposed projects would include improved signing and pavement markings.

### ***Improving Stormwater Drainage***

Under existing conditions, drainage is less than optimal, as portions of the three proposed projects do not have gutters to allow stormwater to drain effectively. During and after large storms, portions of the three streets are inundated with run-off. Stormwater currently drains by runoff from the existing roadways and adjacent drainages into an existing stormwater drain ditch, which parallels Wilson Street. This ditch, along the southern edge of Wilson Street, is open and tends to collect trash and poses as a safety hazard to pedestrians.

The Wilson Street proposed project would eliminate this problem by replacing the existing ditch with an enclosed drainage facility located under the new sidewalk on the south side of this corridor. The Stower Street project would include the addition of a new detention pond. The Strevell Avenue proposed project would include providing a "v-ditch" along the east edge of the sidewalk (on the east side of the street) which would convey stormwater to the drain at Wilson and Strevell. In addition, new gutters would be installed under all three proposed projects. Thus, all three proposed projects would include making improvements to the drainage system over existing conditions. However, it should be noted that the budget for the proposed projects does not include the funds needed to replace the underground drainage system in the vicinity of the project corridors.

### Wilson Street (Existing Conditions)



Wilson St. at Sewell Ave. (looking west down Wilson)



Wilson St. at Sewell Ave. (looking east down Wilson)

**Stower Street – Western Section (Existing Conditions)**



Stower St. at Strevell Ave. (looking east down Stower St.)



Stower St. at Cale Ave. (looking east down Stower St. and at school grounds at right)



Stower St. at Sewell Ave. (looking west down Stower St.)

**Stower Street – Eastern Section (Existing Conditions)**



Stower St. at Sewell Ave. (looking east at vacant field and commercial properties on east side)



Stower St. at Moorehead Ave. (looking north down Moorehead)



Stower St. at Moorehead Ave. (looking south down Moorehead)

**Strevell Avenue (Existing Conditions)**



Strevell Ave. at Wilson St. (looking south down Strevell)



Strevell Ave. (looking north down Strevell)

## 2.0 Alternatives

### 2.1 DEVELOPMENT OF ALTERNATIVES

The Build Alternatives were developed by the City of Miles City as a means to meet the needs described in the previous section. The City and County have discussed the transportation needs of the community in several public meetings over the past years, as documented in Appendix A. The City and County reached consensus that the top recommended transportation projects should include the Wilson, Stower and Strevell proposed projects. In an effort to capitalize on Federal and State urban funding monies available, the City of Miles City approached Montana Department of Transportation with these projects.

The three projects were prioritized by the City of Miles City and Custer County to be constructed in the following order:

- 1st: Wilson Street
- 2nd: Stower Street
- 3rd: Strevell Avenue

The projects were prioritized in case funds are insufficient to construct all three projects. If funds aren't available, the Strevell Avenue proposed project would be postponed.

In the preparation of the environmental documentation for these projects, MDT led a public meeting on February 28, 2002 that reviewed the Build Alternatives in detail. Slight modifications were made to the design, based on comments expressed during that meeting. These modifications have been incorporated in the descriptions provided below. (A summary of the public comments received during the project is provided in Section 4.)

The No Build and Build Alternatives for the three proposed projects are described and evaluated in this Environmental Assessment. The No Build Alternatives are required to be considered in accordance with the National Environmental Policy Act.

### 2.2 NO BUILD ALTERNATIVES

Under the No Build Alternative for each corridor, existing conditions in the corridors of the proposed projects would remain. No improvements are assumed in any upcoming city projects. The characteristics of the streets as they are today, as shown under the "Existing Conditions" column in Table 1, would be perpetuated and are described in this section.

#### ***Wilson Street***

The existing Wilson Street corridor, parallel and to the south of Stower Street, does not have curbs, gutters, or sidewalks on either side of the street. The northern side of the road is lined by residences, while the Holy Rosary Health Center borders the southern side of the road along with scattered residences also. A 0.6 m (2 ft) wide open grass drainage ditch is located on the southern edge of the road. The current roadway is 11.58 m (38.0 ft) wide. In several locations along the northern side of the road, adjacent property owners have made improvements, such as landscaping, in the City-owned right-of-way.

## ***Stower Street***

The Stower Street corridor, located in a residential neighborhood, is just north of the other two project corridors. The project corridor is composed of three sections. The western section, from Strevell to Sewell Avenues, is adjacent to houses, a church and an elementary school playground. The eastern section, from Moorhead to Haynes Avenues, is adjacent to commercial properties. The middle section of the Stower Street corridor, from Sewell to Moorehead Avenues, is a vacant pasture. No road exists to connect the western and eastern sections. Curbs, gutters and an existing drainage system are in place. Only portions of sidewalks exist in various locations along the paved street in the eastern and western sections. The dimension of the existing street is 9.4m (30.8 ft) wide in the western section and 14m (45.9 ft) wide in the eastern section.

## ***Strevell Avenue***

The Strevell Avenue project is the southern most project corridor and extends along Strevell Avenue from Stower to Wilson Streets. The Holy Rosary Health Center is located on the east side of the street, just north of an open field. Residential houses are located on the western side of the street. An open grass drainage ditch approximately 0.6 m (2 ft) wide exists along the eastern shoulder of the road with no curbs or gutters, while the western side is lined by a concrete curb and gutter. No sidewalks are provided on either side of the street. The west side neighborhood covenants prohibit the installation of sidewalks on the west side of the street. The existing width of this street is 8.4 m (27.6 ft).

## **2.3 BUILD ALTERNATIVES**

The Build Alternative for each of the three proposed project corridors are described below. Common elements to all projects include resurfacing, and the addition of curbs, gutters and sidewalks. Elements specific to each proposed project are listed in Table 1 and described below. The preliminary design plans of the proposed projects are provided in Appendix B.

## ***Wilson Street***

The **Wilson Street** proposed project would begin at RP(MP) 0.0 on Strevell Avenue and run east-west for 0.8± km (0.5± miles) to RP(MP) 0.51± at the Haynes Avenue intersection.

The proposed Wilson Street project would include resurfacing and rehabilitating a portion of this street. The project would begin at the intersection with Strevell Avenue and Wilson and extend east 0.8 km (0.5 mi) to Haynes Avenue. The roadway would be widened to 13.02 m (42.7 ft), to include two 3.6 m (11.8 ft) driving lanes and two 2.91 m (9.5 ft) parking lanes on each side of the street. The surface would be rehabilitated. New curb and gutter would be provided on both sides of the street. A new 1.525 m (5 ft) sidewalk would be provided on the south side of the street. The existing open drainage ditch on the southern side of the street would be replaced with a new enclosed stormwater drain. The vertical and horizontal alignments would not be modified. Safety would be enhanced with new signing and pavement markings. The widening of the street, the new sidewalk and the enclosed drainage ditch would also enhance safety.



Table 1: Measurements and Elements of Proposed Projects

Proposed Project	No Build Alternative	Build Alternatives		
	Existing Measurements and Elements	Proposed Measurements of Roadway Width *	Right of Way Envelope	Additional Elements
Wilson Street	11.58 m (38.0 ft) -no curbs, gutters, or sidewalks -drainage ditch on south	2 lanes @ 3.6m (11.8ft) each 2 parking lanes @ 2.91m (9.5ft) each Total: 13.02m (42.7ft)	Existing ROW = varies from 20.8m (68ft) to 26m (86ft) Roadway improvements to occur within City- owned ROW Drainage facility may require acquiring strip of private property at the southern edge of the ditch less than 0.41 ha (0.35 acres)	Add curbs, gutters on both sides Add a 1.525m (5 ft) sidewalk on south side; no sidewalk to be provided on north side Construct new enclosed drainage system Width of total typical section = 15.03 m (49.3 ft) from back of new curb to back of new sidewalk
Stower Street	Western section: 9.4 m (30.8 ft) Eastern section: 14 m (45.9 ft) -includes curb, gutter -includes discontinuous sidewalk in locations -includes drainage system	Western & Middle: Two lanes 3.6m (11.8ft) each Two parking lanes 2.91m (9.5ft) each Total: 13.02m (42.7ft) Eastern Section: Two lanes 3.6m (11.8ft) each Two parking lanes 3.4m (11.2ft) each Total: 14m (45.9ft)	Existing ROW = 20.8 m (68.0 ft) From Sewell to Moorehead, need to acquire 0.415 ha (1.02 acres) of new ROW for street and less than 0.2 ha (0.5 acres) for detention pond Other improvements to occur within City- owned ROW	Add curb, gutters on both sides Add new 1.525m (5 ft) sidewalks on both sides of street Between Sewell and Moorehead Avenues, add new sidewalks at 1.525m (5 ft) each and curb, gutters Construct detention pond for new roadway portion at either northeast or southeast quadrant of Sewell/Stower intersection Width of total typical section = 16.55 m (54.34 ft) from back of new sidewalk to back of new sidewalk
Strevell Avenue	8.4 m (27.6 ft) -includes curb, gutter on west -drainage ditch on east -no sidewalks on either side	2 lanes @ 3.6m (11.8ft) each 2 shldr @ 1.48m (5 ft) each Total roadway width: 10.16m (33.3 ft)	Existing ROW = 20.8 m (68.0 ft) All improvements to occur within City- owned ROW	New roadway width would match the width of Strevell Ave north of Wilson Add one sidewalk on east side 1.525m (5 ft). No sidewalk to be provided on west side. Improve existing drainage on east side of new sidewalk by adding "v-ditch." Uses existing curb on west side and install new curb on east side. Width of total typical section = 12.165 m (39.9 ft) from back of existing west side curb to back of new sidewalk on east side

\* As selected and approved by Miles City Council at the 5/28/02 public meeting.

Source: MDT Project Plans, 2002 and Preliminary Field Reports, 2000.

Limited additional right-of-way may be required along the southern side of the drainage ditch. It is anticipated that this additional strip of property would measure approximately 1.525 m (5 ft) in width and total less than 0.41 ha (0.35 ac) in order to allow for the maintenance of the new drainage facility. Exact measurements of additional right of way would be determined during final design if the proposed project proceeds.

## **Stower Street**

The **Stower Street** proposed project would begin at reference post (RP) (milepost (MP)) 0.96 at the Strevell intersection with Stower Street and extend east 0.8 km (0.5 miles) to Haynes Avenue at RP (MP) 1.47±. The proposed improvements to Stower Street would include resurfacing and rehabilitating the street, and constructing a new section of the street. The project would begin at the Strevell intersection with Stower Street and extend east 0.8 km (0.5 mi) to Haynes Avenue and would include three sections.

In the western section, between Strevell and Sewell, the existing roadway would be widened within the city-owned right-of-way and resurfaced. The western section would also include the addition of new curb, gutter and continuous sidewalks along both sides of the street. The roadway width for the western section would be 13.02 m (42.7 ft) with two 3.6 m (11.8 ft) driving lanes and two 2.91 m (9.5 ft) parking lanes.

The roadway in the eastern section, between Moorehead and Haynes, would be resurfaced but not widened. In this section, milling of existing plant mix would occur next to the existing curb and gutter so that the new overlay would match the elevation of the existing curb. The existing curb, gutter and sidewalk would remain in place for the eastern section. The roadway width for the eastern section would remain 14 m (45.9 ft) wide, with two 3.6 m (11.8 ft) driving lanes and two 3.4 m (11.2 ft) parking lanes.

No road currently exists in the middle section between Sewell Avenue to Moorehead Avenue. In this section, a new road would be constructed for the length of approximately 200 m (656 ft) with curb, gutter and sidewalk, as well as new stormwater drain facilities. The new roadway in the middle section would match the dimensions of the western section (at a 13.02m (42.7ft) width with two 3.6 m (11.8 ft) driving lanes and two 2.91 m (9.5 ft) parking lanes). Acquisition of new right-of-way would be required for this middle section. No new right-of-way would be required in the western and eastern sections along the existing roadway.

The vertical and horizontal alignments would not be modified for the eastern and western sections. There is no existing alignment for the middle section. Safety would be enhanced with new signing and pavement markings.

A new stormwater detention pond would be added in the middle section. It would be located along Stower Street between Moorehead and Sewell Avenues, though the exact position has not been determined at this time. It would be rectangular in shape and estimated to measure approximately 6 m (20 ft) wide by 9 m (30 ft) long, though the exact measurements would be determined during final design if the proposed project proceeds. It would be surrounded by a six-foot chainlink fence, and landscaped with native vegetation and is not anticipated to be an attractive nuisance or a hazard. The new detention pond would be reserved for the drainage associated with the proposed roadway and would not provide capacity for drainage associated with any future development that could occur on the vacant parcel.

Concrete valley gutters would be installed on streets that intersect Stower Street. This would additionally improve drainage by providing areas for surface drainage to drain at intersections.

## ***Strevell Avenue***

The **Strevell Avenue** proposed project would begin at RP(MP) 1.01 at the intersection with Wilson Street and extend south 0.4± km (0.24 miles) to the urban limits of Miles City at RP(MP) 1.25.

The Strevell Avenue project, which would include resurfacing and rehabilitating a portion of the street, would begin at the intersection with Wilson Street and extend south 0.4 km (0.24 miles) to the urban limits of Miles City. The roadway would be widened to 10.16 meters (33.3 ft), to include two 3.6 m (11.8 ft) driving lanes and two 1.48 m (5 ft) shoulders, and it would be repaved. New curb and gutter would be installed on the east side of the street. (The existing curb would remain on the west side of the street.) A new 1.525 m (5 ft) sidewalk would be provided on the east side of the street only, as the west side of the street borders a neighborhood that is under the guidance of a homeowner association which prohibits the installation of sidewalks. A "v-ditch" would be provided along the eastern edge of the new sidewalk to convey stormwater runoff to the drain located at Wilson Street and Strevell Avenue. The vertical and horizontal alignments would not be modified. Safety would be enhanced with new signing and pavement markings. The widening of the street and the new sidewalk would also enhance safety. Additional right-of-way would not be needed for this project.

## 3.0 Impacts

This section provides an assessment of how the proposed projects would likely affect the social, economic, and physical environment. The impacts and effects of the Build Alternative are compared to the No Build Alternative for the three projects. Effects are categorized in this section as those relating to the transportation system, those relating to the community, those on the natural and physical environment, and secondary and cumulative impacts. Long-term effects on social, economic, environmental and transportation factors associated with the Proposed Actions are described in the sections noted below, with the exception of short-term effects or those anticipated to occur during construction of the Build Alternative, which are described in the "Construction" section.

### Effects on the Transportation System

- Access & Traffic
- Pedestrians & Bicycles
- Parking

### Effects on the Community

- Community Resources
- Land Use
- Right-of-Way and Relocations
- Noise
- Visual
- Local and Regional Economics
- Environmental Justice
- Cultural/Archaeological/Historical Resources
- U.S.D.o.T. Section 4(f)
- Parks and Recreation/NL&WCF Section 6(f)

### Effects on the Natural and Physical Environment

- Floodplains (E.O. 11988)
- Water Quality
- Wetlands (E.O. 11990)
- Biological Resources
- Threatened and Endangered Species
- Farmlands
- Irrigation
- Air Quality
- Contaminated Sites

### Secondary and Cumulative Impacts

#### Construction

- Utilities
- Other Actions Required
- Permits

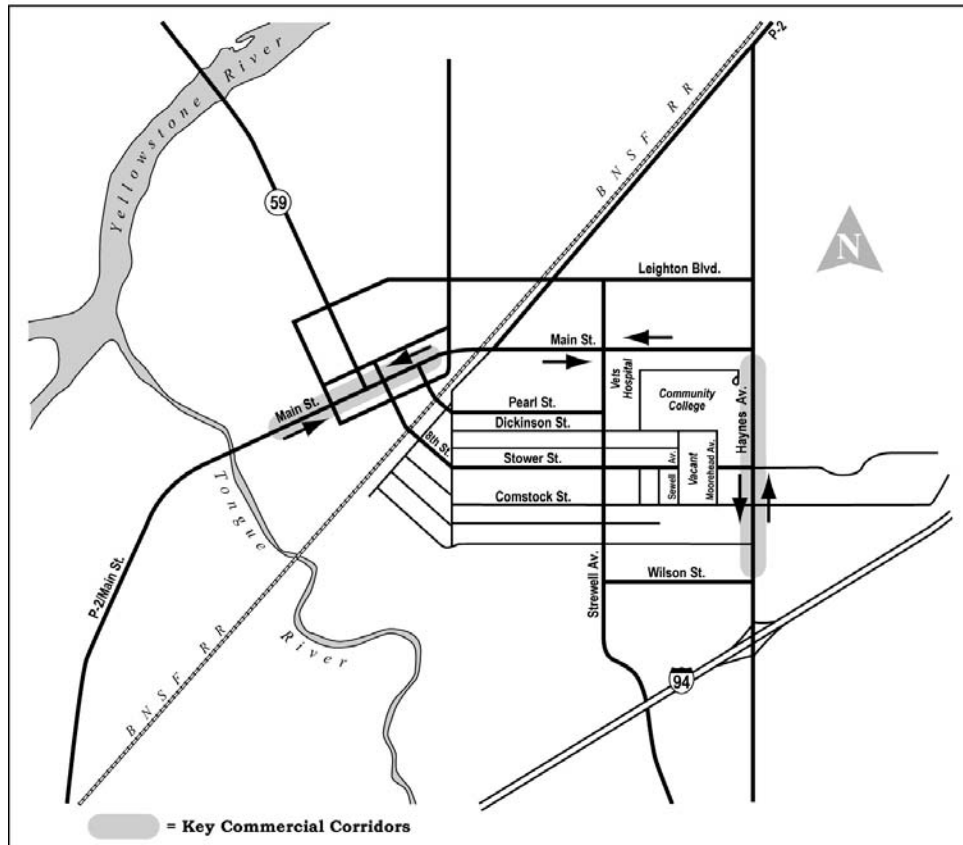
For most topics in this section, conditions and impacts are common to all three projects and are therefore described together. When impacts and/or mitigation differ among projects, they are called out separately.

### 3.1 EFFECTS ON THE TRANSPORTATION SYSTEM

#### Access and Traffic

**Access:** The three projects have been identified in Miles City planning efforts as essential in improving access for local and regional travelers. As shown in Figure 3, the number of east-west through streets that connect the two main commercial sections of town, the Main Street and Haynes Avenue corridors, is limited and therefore increases the amount of out of direction travel. Travelers from each side of town must head north to Main, cross over and then turn south to access the businesses along either corridor (as shown by the arrows), or take a circuitous path using neighborhood collector streets. Stower is one of only a few streets that would be able to provide direct connection between the east and west commercial corridors because it lines up directly with 8<sup>th</sup> Street. If the connection was made between Sewell and Moorehead to make Stower continuous, it would provide improved direct access and connectivity between the west and east sides of town. In addition the Stower Street connection would improve access to the Veterans Hospital, for staff, visitors and emergency services, and to the Community College for college-related traffic which currently relies on Dickinson Street. Opening up Stower Street between Sewell and Moorehead Avenues has been a long-term plan of the City's, and the basis for installing a signal on Haynes Avenue at the Stower Street intersection.

Figure 3. Miles City Street Network



**Traffic data:** MDT compiled traffic data for the streets that would be affected by the proposed projects and have provided in Table 2. MDT used historic growth rates to produce traffic volume forecasts for the Build and No Build scenarios. The historic growth rates include the following: 2.0% for Stower Street, 1.28% for Wilson Street, and 1.4% for Strevell Avenue. For the No Build scenarios, no additional percentage increases were factored into the projections beyond using the compounded historic growth rates.

**Table 2 Current and Projected ADT Data for No Build and Build Alternatives**

Project	2000 Year ADT	2002 Year ADT	2022 Year ADT (No Build Alternatives)	2022 Year ADT (Build Alternatives)
Wilson	1,430	1,510	1,890	1,890
Stower	2,280	2,370	3,520	8,060
Strevell	730	790	1,170	1,170
Main	7,920	9,380	12,380	8,060

Source: MDT, 2003

Traffic projections associated with the Build Alternatives are also listed in Table 2. Traffic volumes are anticipated to continue to increase on Wilson Street and Strevell Avenue from 2002 to 2022 at the historic rates with no additional increases between the No Build and Build Alternative scenarios. It was assumed that any changes in traffic patterns under the Build Alternatives would not yield a discernable adjustment in traffic volumes.

For the Stower Street proposed project, however, traffic is projected to increase above the historic rate associated with the No Build Alternative.

As shown, a notable relationship is projected between traffic forecast for Main and Stower Streets under the No Build and Build Alternatives. If constructed, the Stower Street proposed project would serve to alleviate the traffic along Main Street to the point where the traffic forecast for both streets would be similar under the Build Alternative for year 2022. This is likely due to the construction of the middle section of Stower Street, between Sewell and Moorehead Streets, which would enable Stower Street to serve as another direct east-west route in town.

Traffic speeds and number of lanes for all streets in the table are assumed to remain constant under all scenarios.

Additional traffic data is scarce. A traffic study was conducted before building the WalMart facility at the northeast corner of Stower and Haynes. This study estimated, that upon build-out, 5,700 cars would use this intersection per day. This data, coupled with the City's traffic plans, led to the construction of a traffic light at this location.

While traffic volumes would increase on Stower Street under the proposed project compared to the No Build Alternative, traffic volumes on other streets, including Main, Dickinson and Comstock Streets, would likely decrease as travelers on these streets could choose to use Stower Street as an alternate east-west route. The total sum of traffic in Miles City is not anticipated to increase due to the construction of the proposed projects. As stated earlier, the rerouting of traffic patterns has been a longstanding City goal in order to improve traffic circulation, as noted in the transportation plans of City staff, Planning Board and City Council and has been communicated to the public on several occasions, as is documented in Appendix A.

## ***Pedestrians & Bicycles***

Pedestrian facilities and sidewalks are found in many parts of Miles City. However sidewalks are currently not present along the Wilson and Strevell proposed project corridors, and are only present in some areas along the Stower Street proposed project corridor.

The proposed widening of Wilson between Strevell Avenue and Haynes Avenue would include the installation of new curb, gutter, sidewalks and a new stormwater drainage facility.

The proposed improvements to Strevell Avenue, south of Wilson Street, would include providing a new sidewalk along the east side of the street. The new sidewalks included in the proposed projects would benefit pedestrians by improving access and safety. In addition, improved crosswalks, signage and wider clear zones associated with the proposed projects would enable motorists to see pedestrians at crossing areas better.

Designated bicycle routes would not be included as an element of the proposed projects. However, the wider shoulders and lanes would allow more room for bicyclists to travel on streets safely. The City has begun work on a bicycle master plan that would become part of the State's Transportation Enhancement Plan. The draft identifies potential designated bicycle routes along Haynes, Stower, Wilson and Strevell. There is interest for creating a bike path on Strevell Avenue to serve rural subdivisions on the south side of town, but this would not be developed as part of this proposed project. The proposed projects, with their widened travel lanes and shoulders, would serve the designated bicycle routes well.

## ***Parking***

Informal parking currently exists in few scattered areas along the project corridors. There is inadequate space for parking currently along the Wilson Street corridor. As described in Section 2, spaces for parking would be improved and formally identified under the proposed projects. Parking would be provided along both sides of Wilson Street and in more areas along Stower Street. Designated parking spaces would be available for church members. The Strevell proposed project would not change the existing parking conditions. The proposed projects would generally improve parking over the conditions associated with the No Build Alternative.

## ***Impacts***

Overall the Build Alternatives would serve to improve the transportation system in Miles City. When completed, the Build Alternatives would improve access and safety for vehicular traffic. Residents and visitors would benefit from improved connectivity between the east and west sides of town. The response time for emergency services would decrease under the proposed projects. The Build Alternatives would also provide positive effects of improved pedestrian facilities, access and safety.

However, under the Stower Street proposed project, adjacent property owners would be affected by increased traffic volumes along that street more so than those increased volumes associated with the No Build Alternative. The Highland Park Elementary School, bordered by Stower and Comstock, may experience the effect of less traffic driving in front of the school and more traffic driving along the back side of the school property, on the other side of a six-foot chainlink fence. The First Lutheran Church, of which the side is adjacent to Stower Street, would also experience the increased traffic volumes along Stower. However the bulk of traffic volume increases would likely occur between Sewell and Haynes.

While localized impacts would occur and increased traffic volumes beyond historic increases are projected for the proposed Stower Street project, the speed limits and number of travel lanes would not change in the proposed project corridors from existing conditions. Localized impacts often occur in order to benefit the community as a whole.

The No Build Alternative would not result in traffic increases on Stower Street. It would have none of the benefits, however, to the City's overall traffic patterns and access associated with the Build Alternatives. It would also not bring streets up to design standards and therefore would not serve to improve safety of traveling conditions with wider lanes and shoulders and clear zones at intersections. It would not provide the positive effects of improved pedestrian facilities, access and safety.

### **Mitigation**

If the Stower Street proposed project were to be implemented, the City and MDT would work with concerned adjacent property owners to design mitigation measures for the increased traffic volumes on Stower Street. For example, the City is considering the use of speed control measures or installing speed zones. (A speed zone is an area where speed is limited based on traffic engineering recommendation.) The City has no plans to consider promoting Stower Street as a freight truck route. In addition, crosswalks and other safety measures would be implemented in the vicinity of the Highland Park Elementary School and the First Lutheran Church. Mitigation measures to be taken during construction are discussed later in this section.

## **3.2 EFFECTS ON THE COMMUNITY**

### ***Community Resources***

This section summarizes the effects of the projects on the community resources in the project corridors. Figure 4 shows the location of several community resources described in this section.

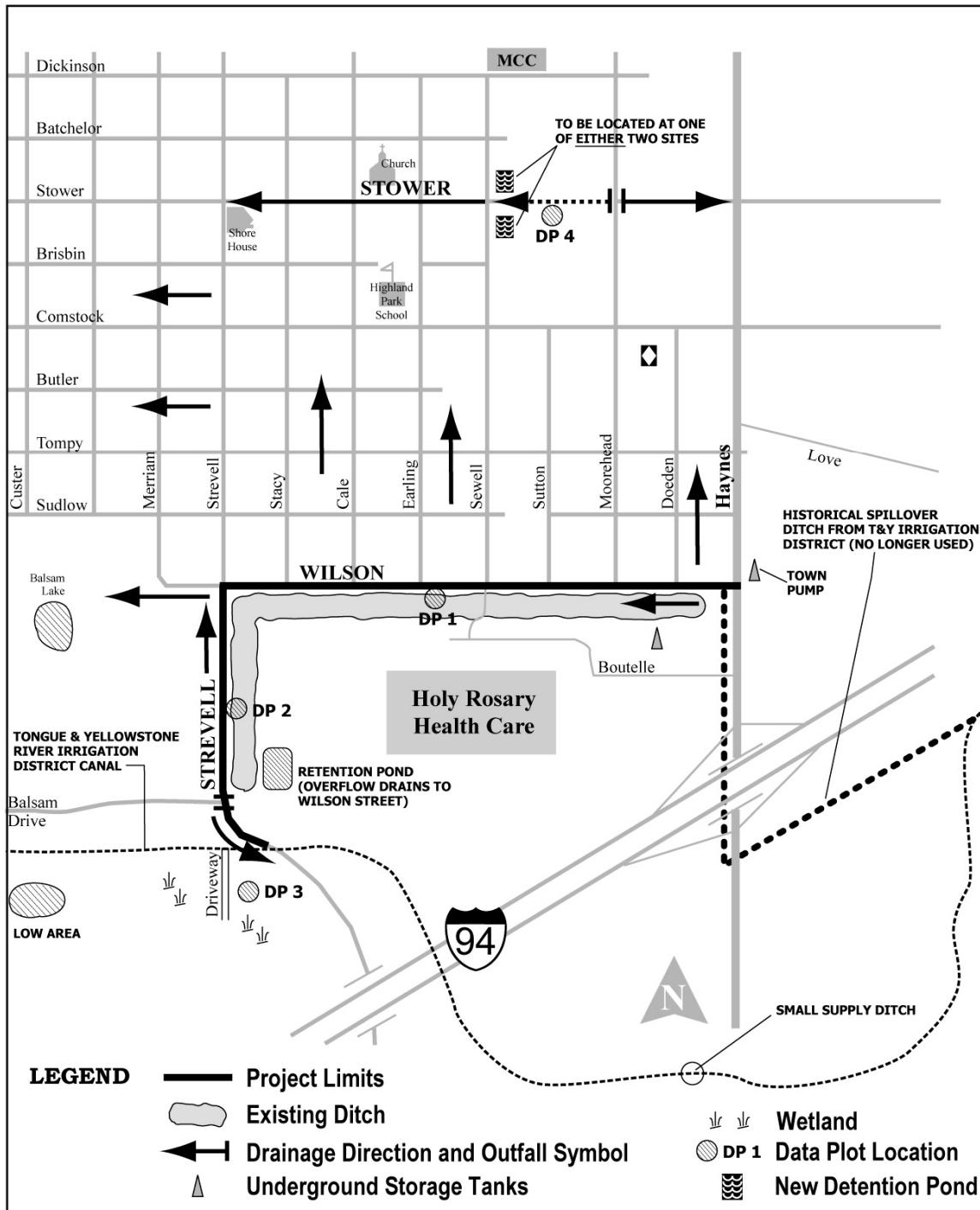
#### **Schools**

The Miles City school system has five public elementary schools, one middle school, one high school and one community college. One public school is affected by the proposed projects. The Stower Street proposed project borders the north edge of the Highland Park Elementary School grounds, between Cale and Earling Avenues. A large number of residents and parents are concerned about the safety of young students in the vicinity of the school, especially in light of the recent tragic death of a young boy on Comstock. They are concerned with the projected increase in traffic volumes associated with the Stower Street proposed project.

However, the Stower Street proposed project may actually provide the opportunity for improving safety of the young students for two reasons. Improved sidewalks and crosswalks would be provided along Stower Street under the proposed project. This, coupled with the widened travel lanes, would improve sight of and clear zones for pedestrians traveling along Stower Street.



Figure 4. Community and Environmental Resources



SOURCE: David Evans Field Work  
October 2001

Secondly, the improved conditions of Stower Street and its new connection to Haynes may encourage local through traffic to use Stower rather than Comstock. The school actually faces Comstock, and school buses and other school-related traffic currently congregate on Comstock between Cale and Earling. Since this street is narrow and does not meet the width established by standards, this block is congested when school buses and parked cars are in the vicinity and room is often only available for one lane of through traffic.

Stower Street borders the school property at the rear of the school, and a playground, bordered by a 6-foot high chainlink fence, separates the school building from Stower Street. Most pedestrian traffic related to the school tends to use Comstock versus Stower Street. Therefore, the Stower Street improvements may serve to reduce the chance of vehicular-pedestrian conflicts on Comstock Street.

Miles Community College, located at 2715 Dickinson Street (north of the proposed Stower Street improvements) enrolls approximately 525 students. Residence halls can accommodate up to 450 students on campus. Part-time students and others travelling to the campus may have shortened and more efficient travel attributed by the proposed projects. The College administration supports the Build Alternatives as a way to improve access to and from the campus. The No Build Alternative would not create these positive travel effects for the College students and staff.

### **Churches/Synagogues**

One church is affected by the proposed projects. One side of the First Lutheran Church is located on Stower Street between Cale and Earling Avenues. It faces Cale Avenue. Members of the Church have expressed their concern regarding safety for their pedestrians under the Stower proposed project, similar to those concerns expressed by school parents. As mentioned previously, pedestrian safety would improve with the Build Alternatives due to the widened lanes and shoulders, which would allow drivers to see pedestrians easier. A new sidewalk provided along the south side of the street and a crosswalk in the vicinity would also improve the conditions for church visitors. Formalized on-street parking would be available for church visitors along both sides of the street—another improvement over existing conditions.

Two other benefits may be provided by the proposed project, if requested. Currently, when a funeral is occurring, the hearse parks on Stower and backs up to the side doors, thereby blocking the existing sidewalk. The proposed project could provide a parking location adjacent to the church for the hearse to park, which would eliminate the current safety problem. Also, no formal handicapped parking is provided in the front of the church. The proposed project could include the provision of formal handicapped parking spaces.

### **Emergency Services**

The proposed projects may have a positive effect on the emergency services provided by the Miles City Police Department, the Emergency Operations Center (EOC) and the Miles City Fire Department. Improved roadway conditions and sight at intersections, along with the new connection at Stower Street, would serve to reduce travel time needed for emergency response. The No Build Alternative would not have this benefit.

### **Hospitals**

In 1995, Miles City welcomed a new medical campus, Holy Rosary Health Center, with a hospital, clinic and extended care facility all under one roof. Sharing the medical campus is the Eastern Montana Community Mental Health Center. The health care campus is located on Wilson Street

between Strevell and Haynes and is therefore adjacent to the Wilson and Strevell proposed projects. This facility is the City's primary hospital.

The Veterans Affairs Eastern Montana Health Care System is another health care facility in town, located north of the Stower Street project, which focuses on providing extended care service. Additional medical services in Miles City include the Custer County Health Department and the Eastern Montana Cancer Center. Home health care service is also provided in Miles City.

The proposed projects would improve access to the medical facilities and reduce travel times. The No Build Alternative would not have these benefits.

### **Parks or Recreational Facilities**

The City operates approximately 225 acres of park and recreation facilities. Wibaux Park, on Strevell Avenue, is located three blocks to the north of the proposed Stower and Strevell projects. The Town and Country Golf Course, a nine-hole golf course and country club, is located three blocks to the west of the Wilson and Strevell. Due to the distance of the proposed projects, the proposed projects are not anticipated to have any effects on either Wibaux Park or the Town & Country Golf Course.

### **Impacts**

Overall, the proposed projects would have positive effects on several community resources due to improving the efficiency and connectivity of travel and safety for pedestrians and motorists using the three streets. Enhanced access, vehicle operations and safety, therefore, would benefit the community as a whole. Access for vehicles related to school and emergency service operations would also be improved.

### **Land Use**

Miles City is the county seat and urban center of Custer County, providing commercial and retail services to farming and ranching interests in the county. The proposed projects exist within the urban area of Miles City. In general, land uses in the City and the project corridors are characterized by low-density urban development including residential, commercial and scattered agricultural uses. The predominant land use is residential, followed by public/semi-public uses.

The primary land uses surrounding the three proposed projects are residential, institutional and commercial. Institutional uses in the residentially-zoned areas of the neighborhood include the following: Miles Community College, north of Stower and west of Haynes; Highland Park Elementary School (K-4), bordering Stower to the south; the First Lutheran Church bordering Stower on the north; and the Holy Rosary Health Care facility (the City's main hospital), bounded on two sides by Wilson and Strevell. Miles City's main commercial corridor is developed along Haynes Avenue, which serves as the eastern boundary of both the Stower Street and Wilson Street proposed projects. WalMart is now located at the intersection of Haynes and Stower. Unique to the area, an urban agricultural vacant lot lies in the path of the proposed Stower Street extension. The parcel, a vacant lot, is being used as grazing land for horses.

The future uses of the urban agricultural parcel, if Stower Street is extended through, would depend on the next owner and possibly require rezoning. The current landowner of this parcel is considering selling his property. Commercial or institutional uses, such as Miles Community College, may be interested in purchasing the property.

## Impacts

There would be no impacts to land uses under the No Build Alternative. Overall, the make-up of the existing land uses would not be directly impacted by the proposed projects, with one exception. The Stower Street proposed project would affect the vacant parcel of agricultural land, located between Sewell and Moorehead Avenues, as it would divide the parcel and make it accessible by traffic. It would ultimately be the decision of the individual property owner and the City Planning Board as to how the two new parcels (bisected by Stower Street) would be developed.

## Mitigation

No mitigation would be required for either the No Build or Build Alternatives.

## *Right-of-Way and Relocations*

### Impacts

**Wilson Street:** All roadway improvements would occur on City-owned land. No additional right of way is needed for the **roadway** portion of this proposed project.

However, limited additional right-of-way may be required along the southern side of the drainage ditch and proposed sidewalk. It is anticipated that this additional strip of property would measure approximately 1.525 m (5 ft) in width and total less than 0.41 ha (0.35 ac) in order to allow for the maintenance of the new drainage facility. Exact measurements of additional right of way would be determined during final design if the proposed project proceeds.

**Stower Street:** The Stower Street proposed project is the only project that would include the construction of new roadway, new curbs, gutters and sidewalks. The new portion of roadway that would be constructed in the middle section through a vacant field between Sewell and Moorehead Avenues, would connect the western and eastern sections of the existing Stower Street to each other. It would necessitate the acquisition of additional right-of-way for a length of 0.2 km (0.12 mile) beyond that which is owned by the City—approximately 25 percent of the total Stower Street proposed project length. The newly constructed portion would match the dimensions of the widened western section of Stower Street. New right of way would also be needed for the new detention pond along Stower Street, between Sewell and Moorehead Avenues. For the Stower Street project, therefore, it is anticipated that a total acquisition of new right of way would sum approximately 0.60 hectares (1.5 acres) in the form of land from the single private property owner. Of this newly acquired property, 0.415 hectares (1.03 acres) would be used to construct the new roadway, and the remaining property would be used for the new detention pond. This acquisition would occur in the middle section of the proposed project; no new right of way would be required for the western or the eastern sections of the Stower Street proposed project.

**Strevell Avenue:** All improvements would occur on City-owned land. No additional right of way would be needed for this project.

For the Wilson and Stower Street proposed projects, some adjacent property owners have expressed concern that they would lose trees, landscaping and parking in front of their properties. Some mature trees and landscaping, which have existed on City-owned land, would need to be removed for this project. Cognizant of this concern, MDT made modifications to the original proposed project plans in an effort to save as many trees as possible.

## Mitigation

No relocations of residences or businesses would be required for the proposed projects. The property needed for the proposed Stower Street project (for the middle section between Sewell and Moorehead) would be acquired from the single private property owner at fair market value. If it is determined that a strip of land is needed along the south edge of the proposed Wilson Street project sidewalk, the property would be acquired from the Holy Rosary Medical Facility and the other private property owner at fair market value. Right-of-way acquisitions are presented to provide a general indication of the extent of the street improvement projects' impacts. During the process of final design, if the proposed projects proceed, specific right-of-way needs would be identified and individual landowners contacted. Permits required during the construction of the proposed projects are described in Section 3.5.

## Noise

The Wilson and Strevell proposed projects are not Type 1 projects, as defined in 23 CFR 772. A Type 1 project is defined as one that adds travel lanes, significantly changes the horizontal or vertical alignment, or builds a new road on a new location. A noise analysis is not required on projects that are not Type 1. Additionally, traffic volumes for these proposed projects are not expected to be different for the Build Alternative compared to the No Build, and travel speeds will not change.

The Stower Street proposed project involves new construction, which is predicted to increase existing traffic volumes. This project falls under the definition of a Type 1 project in 23 CFR 772. A preliminary noise assessment has been completed using the following assumptions:

- Existing Year ADT of 2370, peak hour volume of 10% and 3% trucks (split between medium and heavy)
- Design Year ADT of 8060, design hourly volume of 10% and 3% trucks (split between medium and heavy)
- Existing and Design Year speed limit of 30 mph (48 kph)
- Setback distance for residences of 56 ft (17m)

The predicted hour noise levels and associated hourly traffic volumes, broken down by vehicle class are as follows:

<b>Existing Year 2002</b>	200 Autos	3 Medium Trucks	4 Heavy Trucks	55 dBA
<b>Design Year 2022</b>	777 Autos	12 Medium Trucks	12 Heavy Trucks	61 dBA

According to this preliminary assessment, noise levels would increase six decibels over existing levels to 61 dBA in the Design Year, which is below the Federal Noise Abatement Criteria of 67 dBA and below Montana's Noise Abatement Criteria of 66 dBA for residential neighborhoods. Additionally, the increase in noise levels is well under Montana's definition of a "substantial noise

increase," an increase of 13 decibels or more over existing levels. Based on this preliminary assessment there will be no noise impacts as defined in 23 CFR 772 and Montana's *Traffic Noise Abatement and Analysis: Policy and Procedure Manual* (June 2001).

Because of the predicted increase in traffic volumes for the proposed project, MDT will conduct ambient noise monitoring in the neighborhood to assess the existence of non-traffic noise sources and to verify distances from susceptible receivers to the roadway. A final noise analysis will be completed prior to the final determination of environmental impacts.

### **Visual Impacts**

The No Build Alternative would not change the present appearance of the project corridors. However, it would not improve the appearance of the exposed drainage ditch that parallels the south edge of Wilson Street. However, all three proposed projects would include the addition of roadway enhancements, including wider travel lanes and the addition of curbs, gutters and sidewalks. The Wilson and Stower Street proposed projects would also require the removal of portions of landscaped vegetation and several trees that exist in the city's-owned right-of-way.

**Wilson Street:** No impacts would occur to the visual environment beyond those mentioned above that are common to all three projects. However, the appearance of the existing drainage ditch that parallels the south side of Wilson Street may be improved by the proposed replacement of the ditch with an enclosed underground drainage ditch.

**Stower Street:** The Stower Street proposed project would have additional impacts to the visual environment. The construction of new roadway between Sewell and Moorehead Streets would be a change from the vacant open lot that exists presently. The new roadway in this section would bisect the vacant lot into two parcels. Residential properties in this vicinity would still be adjacent to open lots and still have views of the vacant parcels, with the addition of a roadway and a new detention pond. The new roadway would not be adjacent to any existing structures. The detention pond would likely be surrounded by a six-foot chainlink fence and landscaping.

**Strevell Avenue:** No impacts would occur to the visual environment beyond those mentioned above that would be common to all three projects.

### **Mitigation**

The changes to the visual environment associated with the proposed projects are not considered to be major, and therefore no mitigation is required.

### **Local and Regional Economics**

The top four industries of Custer County include services, agriculture, retail and government. Although agriculture is a main regional industry, Miles City provides a large area of southeast Montana with educational, medical, cultural and commercial services. As the county seat and urban center of Custer County, Miles City provides commercial and retail services to support the farming and ranching interests in the County.

The US 2000 Census lists the population of Miles City as 8,487 (Custer County is 11,696). The Census recorded a similar Miles City population number in 1990. Despite the even levels of population over the 10-year period, the commercial and retail services along Haynes Avenue have been increasing in number, including the addition of a WalMart at the intersection of Stower and Haynes.

## **Impacts**

Plans for any future development in the City are unknown at this time. The degree to which commercial services grow is often linked to the population growth of the city and county. The proposed projects would not directly increase the overall total volume of sales for the regional or local economy.

However, the proposed projects may serve to enhance economic benefits to the City in several ways. As mentioned previously, access to commercial corridors would be improved, which may increase sales revenue. The Stower Street proposed project, by providing the new link between Sewell and Moorehead Avenues, would create a more direct connection to the businesses along Haynes Avenue and Main Street (see Figure 3 in previous section). Therefore, it would improve the travel convenience to businesses along both the Haynes Avenue corridor and along Main Street in downtown Miles City by local patrons that currently have to meander along neighborhood streets.

In addition, Main Street businesses have vocalized their support of the Stower Street project because they feel it may encourage more sales by regional and out-of-town patrons. Many visitors enter Miles City from I-94, at the south end of Haynes Avenue, and stay at hotels along Haynes Ave. The visitors often do not venture beyond the newer developed Haynes Avenue corridor to explore the retail opportunities of the historic downtown located on the west end of Main Street. A more direct connection to this area, provided by the Stower Street project for example, may serve to encourage more trips to Main Street businesses.

Also, the commercial viability of the vacant parcel between Sewell and Moorehead Avenues may be enhanced by the Stower Street proposed project. The eastern half of this parcel is adjacent to other commercial properties. The addition of infrastructure enhancements to the vacant parcel (not covered by City funds) may make it more viable from a commercial standpoint, and therefore potentially more desirable to developers. Turning a portion of the vacant parcel into commercial development would provide the opportunity of increased tax revenues for the City.

No relocations of residences or businesses are anticipated to be required for the proposed projects. Once constructed, the proposed projects would not permanently impede access to any business property.

The No Build Alternative would not provide any economic benefits to the Miles City community.

## **Mitigation**

Long-term economic impacts associated with the Build Alternatives may be beneficial and would therefore not require mitigation. Local businesses may experience inconvenience, however, during the construction of the proposed projects. Mitigation for short-term impacts is described later in Section 3.5 Construction.

## ***Environmental Justice - Executive Order 12898/Title VI***

Executive Order 12898, issued in February 1994, directs all Federal agencies to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low income populations in the United States..."

Using U.S. 2000 Census data, the demographic composition of the population within Custer County is predominantly Caucasian, with a representation of 3.0 percent for minorities (including American Indians, Eskimos, Aleut, Asian and Pacific Islanders, other races and Hispanics). The

2000 estimated percentage of minorities in Miles City is 3.3 percent. The estimated percentage of minorities within the state of Montana in 2000 was 9.4 percent.

According to the 2000 Census, the per capita personal income in 1999 for Custer County residents was \$15,876 while the citywide average per capita income was \$16,449 and the statewide average per capita income was \$17,151. The percent of the population living under the poverty level in Custer County is higher than that for the state (15.1% compared to 14.6%) or for Miles City's percentage of 14.7%.

The neighborhoods surrounding the proposed projects do not have higher percentages of lower income or minority people than other areas in Miles City.

## **Impacts**

The improvements associated with the proposed projects would benefit all travelers and pedestrians in Miles City, regardless of ethnicity or income level. The adverse effects associated with the proposed projects would not be borne by low income and minority populations more than others.

From guidance provided by the Department of Transportation's Final Environmental Justice Strategy, it can be determined that there is no "disproportionately high and adverse effects on minority or low-income populations." This determination was made based on the following criteria.

- The adverse impacts from the projects would not be predominantly born by minority populations and/or low-income populations; and
- The adverse impacts to the minority or low-income populations would not be more severe or greater in magnitude than the adverse impacts to the non-minority population and/or non-low-income populations.

The proposed projects would not disproportionately impact low income or minority populations, and mitigation is not necessary.

## ***Cultural/Archaeological/Historical Resources***

Historic and cultural resources are defined in Section 301 of the National Historic Preservation Act (NHPA) of 1966, as amended, as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register of Historic Places (NRHP) [16 USC 470W]." Cultural resources are determined for listing on the NRHP through consideration of established criteria. In order to be eligible for listing on the National Register, the property in question must be important in American history, architecture, archaeology, engineering, or culture, while also possessing integrity of location, design, setting, materials, workmanship, feeling, and association. In addition, properties must meet at least one of the following criteria:

- A. Association with events that have made a significant contribution to the broad patterns of the area's history.
- B. Association with the lives of persons significant in the area's past.
- C. Embodiment of distinctive characteristics of a type, period, or method of construction, or representation of the work of a master, or possession of high artistic values, or representation of a significant distinguishable entity whose components may lack individual distinction.



D. Has yielded, or may be likely to yield, information important in prehistory or history.

The cultural resources inventory for the proposed projects was conducted by the Montana Department of Transportation in compliance with federal guidelines, including Sections 106 and 110 of the NHPA, 36 CFR 800. In compliance with these laws and regulations, and specifically 36 CFR 800, a survey was conducted to identify resources listed on or eligible for listing on the NRHP that are in the study area of the proposed projects. MDT identified one property in the Stower Street proposed project corridor that may be eligible for NRHP listing.

### Impacts

**No Build Alternative:** The No Build Alternative would have no impact on historic and cultural resources within the combined study area.

**Wilson Street:** No historic resources were identified along this proposed project corridor.

**Stower Street:** One historic resource, the Thomas Shore Residence (24CR916), has been identified in the Stower Street proposed project corridor. The historic residence, including the craftsman-style structure built in 1914 and surrounding property, is located at 602 South Strevell (at the corner of Stower Street), adjacent to the proposed Stower Street project corridor as shown on Figure 4. It has been surveyed and deemed eligible for listing on the National Register of Historic Places according to MDT. The property has been nominated for listing on the National Register of Historic Places.

The Build Alternative for the Stower Street proposed project would have no physical impacts on the Thomas Shore Residence. Curb, gutter and sidewalk would be added along the Stower Street side of the property (the property faces Strevell Street), which is within the City's right-of-way. A portion of this property owner's fencing and landscaping is currently within the City's right-of-way and would need to be removed to install the sidewalk, curb and gutter. MDT completed a Determination of Effect (DOE) for the proposed Stower Street project, attached in Appendix C. This DOE finds that the project would not be a substantial encroachment on the Thomas Shore Residence or diminish the qualities that make the site eligible for listing. Therefore, the qualities that make the site eligible for listing would be perpetuated, and the proposed project would not *adversely* affect the Thomas Shore Residence. The Montana State Historic Preservation Office concurred with this determination of effect, as demonstrated by the copy of the letter included in Appendix C.

**Strevell Avenue:** No historic resources were identified along this proposed project corridor.

### Mitigation

MDT has confirmed the Stower Street proposed project improvements in the vicinity of the Thomas Shore Residence would occur within the city-owned right-of-way and would have no adverse effect on the Thomas Shore Residence. No construction easements would be needed from this property owner. MDT initiated discussions with the property owners and created a Memorandum of Agreement to mitigate the effects of the proposed Stower Street project on their property. As part of this MOA, MDT nominated the property to the National Register of Historic Places. The nomination was approved by the Montana State Board in October 2002 and has been forwarded to the Keeper of the National Register. A copy of the MOA is included in Appendix C.

### ***USDoT Section 4(f)***

Title 23 of the Code of Federal Regulations 771.135 Section 4(f) (49 USC 303) of the U.S. Department of Transportation Act states that “the Administration may not approve the use of land from a significant publicly-owned park, recreation area, or wildlife and waterfowl refuge or any significant historic site unless a determination is made that:

- (i) there is no feasible and prudent alternative to the use of land from the property; and
- (ii) the action includes all possible planning to minimize harm to the property resulting from such use.

The applicability of these provisions cited above was assessed for the three proposed projects. The findings are summarized as follows.

None of the proposed projects would be near a publicly-owned park, recreation area or wildlife/waterfowl refuge. Although there is a school playground along Stower Street, the proposed project would not use or impact this recreational facility. The proposed projects would not use or impact the Wibaux Park or the Town & Country Club Golf Course.

The only potentially historic site identified near the proposed projects is the Thomas Shore Residence (24CR916) at 602 South Strevell, which faces Strevell Avenue at the corner of Stower and Strevell. This site, which is eligible for the National Register of Historic Places (NRHP), sits adjacent to the proposed Stower Street project.

MDT staff have determined that the proposed project would have no adverse effect to the Thomas Shore Residence, and the Montana SHPO concurs with this determination (see copy of letter provided in Appendix C).

Although this historic site is adjacent to the proposed Stower Street project, no construction easements from or use of the historic site would occur. No other impacts have been identified that would substantially impair the historic integrity of the site. Based on this assessment, Section 4(f) is not applicable to any of the three proposed projects.

### ***Parks and Recreation/NL&WCF – Section 6(f)***

No Section 6(f) National Land and Water Conservation Fund Act (16 USC 460) properties have been identified within the vicinity of the projects. No acquisition or use of Section 6(f) properties would occur. There would be no impacts on such properties from the proposed projects.

## **3.3 EFFECTS ON THE NATURAL & PHYSICAL ENVIRONMENT**

### ***Floodplains (E.O. 11988)***

Executive Order 11988 defines “floodplains” as lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in a given year. Executive Order 11988 and FHWA’s floodplain regulation (23 CFR 650, Subpart A) require an evaluation of the proposed project to determine if any of it would encroach on the “base” floodplain. The “base” floodplain is defined as the area covered by water from a “100-year” flood. The “100-year” flood represents an event, which has approximately a one percent (1±%) chance of occurring on any day, or the probability of occurring once in a century. The Federal Emergency Management

Agency (FEMA) has delineated approximate 100-year floodplain boundaries for the Yellowstone River and the Tongue River. The proposed projects are located a distance of 1.6 kilometers (1 mile) or more away from the two rivers.

## **Impacts**

Neither the No Build Alternative nor the Proposed Projects cross the Yellowstone or Tongue Rivers or are located in the 100-year floodplain boundaries. No mitigation is anticipated to be needed for the No Build or Proposed Alternatives.

## **Water Quality**

The Yellowstone River flows easterly north of the proposed project area. The Tongue River runs southeasterly just west of the project area. The proposed projects are located a distance of 1.6 kilometers (1 mile) or more away from the two rivers. No major or minor creeks are in the project area. However, stormwater ditches are present in the corridors of the proposed projects. These ditches and the direction of stormwater flow in the project corridors are shown in Figure 4.

Wilson Street contains an earth-lined stormwater ditch on the southern side of the road. This area only contains water during storm events.

Stormwater currently collects in concrete gutters along the sides of the existing Stower Street, flowing east and west to the City's enclosed trunk line, which flows north along Strevell and Haynes to a settlement pond near the Yellowstone River. This water then drains into the river after being filtered in the settlement pond (Mengel, 2002).

Strevell Street contains an earth-lined stormwater ditch on the eastern side of the road. An irrigation canal exists at the southwestern end of Strevell Avenue. The irrigation canal channels seasonal water through a culvert into a low depression area on the southwestern side of the road, on private property adjacent to the project limits.

Stormwater from Wilson Street and Strevell Avenue flows west and north to the intersection of these two streets. The stormwater then discharges into an outfall, which empties into Balsam Lake, located less than 305 meters (1,000 feet) west of the intersection of Strevell Avenue and Wilson Street. Balsam Lake has been described by Miles City staff as a 'catch-all' for stormwater drainage that tends to flow south/southwest from the residential areas just north of Wilson Street, following a natural drainage course.

## **Impacts**

Stormwater would continue to be collected and treated by the City in Balsam Lake and a settling pond near the Yellowstone River.

All three proposed projects include the provision of new gutters along the length of the three corridors. The Wilson Street proposed project includes replacing the existing drainage ditch on the south side of the street with a covered concrete ditch. The Stower proposed project includes the construction of a detention pond on either the northeast or southeast corner of Sewell and Stower. This detention pond is not anticipated to be a nuisance or a hazard. The Strevell Avenue proposed project also includes replacing the existing ditch on the east side of the street with a v-ditch on the east side of the new sidewalk, to convey the drainage running off the new sidewalk to the north. None of these improvements would affect the management of the existing water quality.

No permanent impacts to water quality would result from the Build Alternatives for this proposed project. The improvements to the gutters and drainage system would not have an effect on the current water quality. Construction techniques would adhere to MDT's standard specifications for stream protection and implementation of erosion control Best Management Practices (BMPs) as shown in the Erosion Control Plan. No long-term mitigation would be required. Short-term mitigation to be employed during construction is described later in this section.

### ***Wetlands (E.O. 11990)***

Wetlands are regulated by Section 404 of the Clean Water Act, Executive Order 11990 Protection of Wetlands and E.O. 11998 Floodplain Management. The Army Corps of Engineers (COE) is the primary regulating agency in Montana. Under both the COE's 33 CFR 328.3 and the EPA's 40 CFR 230.0, "wetlands" are those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

All wetland areas that may be affected by proposed projects are delineated under criteria developed by the U.S. ARMY'S Corps of Engineers (COE). These criteria require the presence of three parameters: 1) hydric soils, 2) hydrophytic vegetation, and 3) a hydrologic regime for an area to be classified as a wetland.

On November 9, 2001, a field investigation was conducted to determine the presence and extent of jurisdictional wetlands along the proposed project corridors for approximately a width of 20.7 meters (68.0 feet) at a minimum for the three projects. The Stower Street project corridor additionally includes the acquisition of 12.6 meters (41.3 feet) of new right-of-way through a vacant field (between Sewell and Moorehead Avenues). The vegetation, soils, and hydrology of the site were examined at each data plot according to the *Corps of Engineers Wetland Delineation Manual* (U.S. COE, 1987). These methods require that evidence of three parameters (a dominance of hydrophytic vegetation, hydric soils, and wetland hydrology) be simultaneously present for a jurisdictional wetland determination. Details are provided under separate cover in the Biological Resources Report dated May 2002.

*The National Wetland Inventory* (NWI) map identifies one wetland area located outside the boundaries of the Strevell Avenue proposed project. This area at the southwestern end of the Strevell Avenue, approximately 6.1 meters (20 feet) from the proposed Strevell Avenue project site boundary, displayed the presence of the three parameters of positive wetland identification (hydrophytic vegetation, hydric soils, and wetland hydrology) during the site investigation. Therefore, this site was confirmed as a jurisdictional wetland. It is formed from a topographical depression and from the accumulation of stormwater that is diverted into this area through an irrigation canal and a series of culverts. Conceptual plans for the proposed projects show that the wetland area is located outside the area of disturbance and would therefore not be impacted permanently by the proposed project.

### **Impacts/Mitigation**

No long-term impacts to wetlands, including the wetland identified south of the Strevell Street proposed project, would be caused by the Build Alternatives or the No Build Alternatives. Short-term impacts and mitigation associated with the construction are described later in this section.

## **Biological Resources**

The Biological Resource Report, dated May 2002, describes in detail the common terrestrial and aquatic species found in the vicinity of the proposed projects.

The vegetation in the project sites consists primarily of ornamental trees and shrubs, such as blue spruce, columnar poplar, ponderosa pine, bur oak, American elm, common chokecherry, plains cottonwood, and ryegrass. Most of the vegetation in the project corridors is composed of residential lawns and includes a herbaceous layer of planted ryegrass. The area at the southwestern end of Strevell Avenue, adjacent to the project site, is located on rural residential property and contains primarily western snowberry, sandbar willow, and plains cottonwood.

**Terrestrial Species.** Upland game birds may be present in the vicinity, but none were observed during fieldwork. Western neighborhood bird species, such as American robin, black-capped chickadee, common crow, song sparrow, mountain bluebird, northern flicker, mourning dove, common poorwill, chimney swift, red-headed woodpecker, western wood-peewee, swallows, black-billed magpie, white-breasted nuthatch, gray catbird, northern mockingbird, black-headed grosbeak, and common grackle, are likely to occur in the project corridors.

Raptors may occur in the project corridors including the red-tailed hawk and American kestrel. Several other species such as the northern harrier, great horned owl, and osprey may be in the vicinity, closer to the riparian areas of the Yellowstone and Tongue Rivers or in more remote settings outside the residential areas. Great horned owls are known to nest in the project vicinity (Sickerson, 2001). Nesting season occurs in February.

Bald eagle is a species of special concern, according to MNHP. The nearest documented bald eagle nest is located along the Yellowstone River, approximately 6.4 kilometers (4 miles) southwest of Miles City (MNHP, 2002). Bald eagle wintering activity may occur on the Yellowstone River, approximately 1.6 kilometers (1 mile) from the project sites (MNHP, 2002). The project sites are not within line-of-sight vision of the rivers, no nests are documented within 1.6 kilometers (1 mile) of the project sites, and no wintering habitat is present in the project sites.

According to MNHP (February, 2002), there are also two plant species of special concern that could possibly occur in the vicinity of the projects, though neither are known to occur within the project corridors. These species include the Schweinitz' flatsedge and white-bract stickleaf plant species.

**Aquatic Species.** The Yellowstone River and the Tongue River are located approximately 1.6 kilometers (1 mile) west of the project vicinity. Fish species commonly found in the Yellowstone and Tongue Rivers include shovel nose sturgeon, brown trout, pike, channel catfish, black bullhead, largemouth bass, small mouth bass, black crappie, white crappie, perch, walleye and other species.

According to correspondence from MNHP in 2002, there are four aquatic species of special concern that could possibly occur in the vicinity of the projects. These are found in or associated with the Yellowstone and/or Tongue Rivers and include: the paddle fish; the sturgeon chub; the blue sucker; and the spiny softshell.

As mentioned in the previous section, the proposed projects would not impact water quality in the vicinity of the projects. The treatment of stormwater would not be altered.

## Impacts

**Terrestrial Species.** There would be no overall impact to terrestrial resources as a result of the proposed projects because the project corridors are located in residential, developed settings. Impacts would be limited to areas immediately adjacent to the existing roads in the city-owned right-of-way and in the vacant parcel of land on Stower, between Sewell and Moorehead Avenues. The majority of the vegetation and habitat that would be affected is located in existing residential areas and is landscaped ornamental vegetation, with the exception of the vacant parcel on Stower Street. In the vacant parcel, native terrestrial resources have already been highly disturbed from horse grazing activities.

Bald eagle wintering activity on the Yellowstone River would not be affected, because the project sites are not within line-of-sight vision of the Yellowstone River and are 1.6 kilometers (1 mile) or more from potential habitat along the river.

Some bird species that may be found in the project corridors, while not species of special concern at the federal or state level, are protected by the Migratory Bird Treaty Act of 1918. Under this Act, destruction or damage of suitable habitat is prohibited during nesting season without a permit issued by the USFWS. The great horned owl begins nesting in the vicinity after February 1st. Although bird nests may be located adjacent to the existing roads or in the project corridors, none were observed during the field survey. Therefore, it is unlikely that migratory bird nests would be affected by the construction of the proposed projects.

Regarding plant species of special concern, the proposed projects would not affect Schweinitz' flatsedge because this species is commonly found in sparsely vegetated sand dunes on the plains and suitable habitat does not exist in the project corridors. The Stower Street proposed project may affect, but is not likely to adversely affect, white-bract stickleaf in the vacant middle segment of this proposed project.

**Aquatic Species.** The project corridors are located 1.6 km (1.0 mile) from the Yellowstone and Tongue Rivers. Stormwater from the corridors would not drain directly into the Yellowstone or Tongue Rivers. The proposed projects would not alter the existing stormwater drainage pattern. Stormwater would continue to drain through the City's stormdrain system to holding ponds near the Yellowstone River for settling and filtering prior to discharge into the river. Therefore, the three proposed projects would not affect fish or aquatic reptile species.

## Mitigation

Because the three proposed projects would have no impact to aquatic species or their habitat and no impact to the terrestrial resources in the project area, mitigation would not be required. No mitigation beyond common best management practices is recommended. Efforts to be undertaken during construction are described later in this section.

## ***Threatened and Endangered Species***

The Endangered Species Act (ESA) directs federal agencies to ensure that actions authorized, funded, or carried out by them are not likely to jeopardize the existence of any threatened, endangered, or candidate species, or result in the destruction or modification of their critical habitat. The Biological Resource Report (BRR), completed for the proposed projects, was conducted primarily to assist MDT in its coordination with the U.S. Department of the Interior's Fish & Wildlife Service (USF&WS) to assure compliance with the ESA of 1973, as amended. Procedures outlined by the USFWS were followed in completing the BRR for all species that may occur in the vicinity of the projects.

No Threatened or Endangered species were identified within 1.6 km (1.0 mile) of the proposed project areas. Correspondence from the USFWS in 2001 states that "the Service does not anticipate any project-related adverse impacts to T/E, proposed, or candidate species, or any critical habitat" (Appendix D).

### Impacts

There would be no impacts to Threatened or Endangered terrestrial species or habitat as a result of the proposed projects. Vegetation removal and disturbance would be limited to areas immediately adjacent to the existing roads and in the newly acquired right-of-way for the middle segment of the Stower Street project, between Sewell and Moorehead Avenues. The vegetation and habitat that would be primarily affected is ornamental in a residential area and is already being impacted from vehicles and humans.

The project corridors are at least 1.6 kilometers (1 mile) away from the Yellowstone and Tongue Rivers, or any other water body. The proposed projects would not alter the existing stormwater drainage pattern. Stormwater from the proposed projects would not flow directly into any river systems, but would continue to drain through the City's stormwater drain system to holding ponds and Balsam Lake, outside the boundaries of the project corridors. Therefore, none of the three proposed projects would have an effect on Threatened and Endangered fish or aquatic reptile species or their habitat.

### Mitigation

Because there would be no impact to Threatened or Endangered terrestrial or aquatic species or habitat in the project corridors, mitigation would not be required.

### Farmlands

The 1981 Farmland Protection Policy Act (FPPA) requires the examination of effects of proposed highway projects prior to the acquisition of farmland. Pursuant to the FPPA, an inventory of farmland in the proposed project corridors was completed. The majority of land adjacent to the proposed projects is urban developed land and used for residential and commercial purposes. One undeveloped, privately-owned parcel, used primarily as pasture for horses, exists in the Stower Street proposed project corridor, between Sewell and Moorehead Streets. This parcel is actually located outside the city limits, although it is bordered on all sides by city-designated land and is considered within the urbanized planning boundaries designated by MDT. According to a review of the Important Farmland mapping provided by the U.S. Department of Agriculture – Natural Resources Conservation Service (NRCS), the *western half* of the vacant parcel on Stower Street would be considered prime farmland *if it were to be properly irrigated*.

Consultation with the NRCS has confirmed, however, that the 13.02m (42.7ft) wide corridor of new right of way needed for the proposed Stower Street project, between Sewell to Moorehead Streets, would not negatively impact the potential prime farmland along the western section of the vacant parcel. No mitigation would be required.

### Irrigation

No irrigation facilities are located in or cross the corridors of the proposed projects. An irrigation canal exists in the vicinity of the southwestern side of Strevell Avenue. The irrigation canal, shown on Figure 4, channels seasonal water through a culvert into a low depression area on the

southwestern side of the road, on private property outside of the proposed project limits. This canal would not be impacted by the No Build and Build Alternatives. No mitigation would be needed.

### ***Air Quality***

The proposed projects are located in an unclassified/attainment area of Montana for air quality under 40 Code of the Federal Regulations CFR 81.327, as amended. As such, the proposed alternatives are not covered under the U.S. Environmental Protection Agency's "Final Rule" of November 24, 1993 on Air Quality Conformity. Therefore, the No Build Alternative and the Build Alternatives would both comply with *Section 176(c)* of the *Clean Air Act* (53 U.S.C. 7521 (a), as amended. No mitigation is required for either the No Build or the Build Alternatives.

### ***Contaminated Sites/Hazardous Materials***

The Montana Department of Transportation completed contaminated site and hazardous waste reviews and initial site assessments for the three proposed projects, using data supplied by the UST list and PFRR.

### **Impacts**

**No Build Alternative:** The No Build Alternative would have no impact on any contaminated sites.

**Wilson Street:** Two sites have been identified along the Wilson proposed project corridor and are shown on Figure 4. An 8,000-gallon underground storage tank is located at 2600 Wilson Street at the Holy Rosary Health Center, but is not a leaking site and is located a considerable distance from the proposed project boundaries. Another site, located at the east end of Wilson Street at 1210 S. Haynes (at the Town Pump), contains ten to twelve 10,000-gallon tanks. Some of these tanks at this site have been known to leak. One such tank at the intersection of Wilson and Haynes (in the vicinity of the Town Pump business) was documented to leak in the past. After being evaluated by a MDT hazardous materials specialist, it has been determined that the proposed project would not impact this site. Because the proposed project would not involve water line or stormwater drain work in the vicinity of Haynes Avenue, there would be no impact to solid or hazardous waste sites.

According to the Miles City staff representative, contaminated sites near Wilson Street east of Haynes have been found to be in compliance as of 2001.

**Stower Street:** No sites have been identified as being located adjacent to the Stower proposed project, and therefore the project would not impact these sites.

**Strevell Avenue:** No sites have been identified as being located adjacent to the Strevell Avenue proposed project, and therefore the project would not impact these sites.

### **Mitigation**

MDT has concluded that the No Build and Build Alternatives for these projects would not impact the contaminated materials sites. No impacts are anticipated to exist for the Stower and Strevell proposed projects. The proximity of the leaking sites at the east end of Wilson Street is not anticipated to be a problem as long as construction of the proposed project does not exceed beyond five feet below the soil surface.





### 3.4 SECONDARY AND CUMULATIVE IMPACTS

No other City or MDT projects have been identified as occurring within the vicinity of the three proposed projects. The sum of the effects of the three proposed projects is not anticipated to be greater than the effects of the three proposed projects individually. However, the improvements associated with the Stower Street proposed project may result in a change in traffic patterns as previously discussed in this section. The impacts of this anticipated change in traffic patterns on individual topic areas has been discussed in previous sections. Most notably, this change in traffic patterns could serve to encourage development to occur along Stower Street between Sewell and Moorehead Avenues.

### 3.5 CONSTRUCTION

#### *Utilities*

In general, no new right-of-way would be needed for the proposed projects in order to rehabilitate the roadways to current MDT standards. New right-of-way would need to be acquired, however, through a vacant parcel for the Stower Street project between Sewell and Moorehead Avenues. It is also possible that a small strip of right of way would be needed along the south edge of the new drainage facility along the south side of Wilson Street.

The following activities associated with utilities are anticipated in association with construction activities related to the proposed projects:

- Wilson Street: stormwater drain, drop inlets, overhead power, adjust manholes and water valves to grade
- Stower Street: adjust manholes and water valves to grade; new water, sewer and power service to be provided from Sewell to Moorehead possibly
- Strevell Avenue: adjust manholes and water valves to grade

The following owners of utilities with right-of-way along the corridors of the proposed projects were identified and listed in Table 3 below.

**Table 3: Utility Owners in the Vicinity of Proposed Projects**

Utility	Owner
Water and Sewer	City of Miles City
Telecommunications	Qwest; Mid-River Telephone Cooperative
Cable TV	AT&T Broadband; Cable & Communications Corporation
Overhead Power	Montana Dakota Utilities Company

New right-of-way for utilities and associated construction permits would be needed for the Stower Street project through the vacant field between Sewell and Moorehead Streets. However, no major impacts to utilities, including water, power and sanitary sewer lines, along the right-of-ways for the projects have been identified for the No Build or the Build Alternatives. Coordination with utility providers in the projects' areas would be conducted prior to construction of the proposed facilities.



## ***Other Actions Required***

### **Community Impacts**

The proposed projects may impact residents and businesses in the short term due to delays related to construction. The businesses located adjacent to the proposed project corridors may be additionally inconvenienced during construction due to access limitations.

Access to the properties in the corridors would be maintained during construction. Using a "half-at-a-time" approach, traffic would be maintained through the projects' construction areas with appropriate signing and flagging in accordance with the Manual on Uniform Traffic Control Devices. The contractor of the proposed projects would determine if any detours would be needed. During construction of the projects, pedestrian and bicycle traffic in the vicinity would be redirected as needed.

The contractor selected to construct the proposed projects would be restricted from working past 6:00 pm.

### **Impacts to the Physical Environment**

Construction techniques would adhere to MDT's standard specifications for stream protection and implementation of erosion control Best Management Practices (BMPs) as shown in the Erosion Control Plan. Best management practices would be utilized to minimize effects of sediment runoff during the construction period. All work would be done in accordance with the Water Quality Act of 1987 (P.L. 100-4), as amended.

Because a wetland area is located within 6 meters (20 feet) at the south of the disturbance boundaries of the Strevell Avenue proposed project site, possible impacts to the wetland associated with the project may include equipment access during construction and sedimentation into the wetland area. Best Management Practices for Erosion Control should be placed adjacent to the road during construction at the southern end of Strevell Avenue and no equipment would be permitted in the wetland area. Every effort should be made to avoid any unnecessary impacts to the wetland area. No wetland replacement or other mitigation activities are required.

All trees, shrubs and other woody vegetation within the construction limits of the proposed projects would be removed between September 1 and February 1, before the anticipated date of construction to avoid all conflicts with the federal Migratory Bird Treaty Act (MBTA). This measure would ensure that nests of early nesting birds, such as the Great Horned Owl, would not be directly affected by the construction activities of this project. Additionally, every effort should be made to minimize the projects' effect on trees, shrubs and other woody vegetation that exist outside construction limits, to further comply with the MBTA. All project work would cease immediately if an active nest of a bird of prey species is discovered within this project's construction limits. If this occurs, a Montana Fish, Wildlife and Parks (FWP) or MDT District Project Biologist would be contacted immediately for further assistance. However, adherence to the above mitigation measure should prevent any work stoppages for migratory birds.

The proximity of the leaking sites at the east end of Wilson Street is not anticipated to be a problem as long as construction of the proposed project does not exceed beyond five feet below the soil surface. If minor contamination is discovered during construction, it would be handled through the *Standard Specifications for Road and Bridge Construction, 1995 Edition*.

Air quality may be temporarily impacted during construction due to dust and fumes emitted from construction equipment. These would be short-term effects only. MDT would follow dust suppression Best Management Practices during construction.

All construction would meet and provide for ADA requirements.

### ***Permits Required***

For all three (3) projects, temporary construction permits may be necessary to set forms for new sidewalks and ADA ramps and provide areas for the contractor to work, to perform landscaping. No other permits are identified as being required for the construction of the projects. The U.S. Corps of Engineers concurred in their letter, dated December 21, 2001, that no permit is required from the Corps because these projects would not require any work to occur in Waters of the United States. The proposed projects would require a Section 402/Montana Pollutant Discharge Elimination System (MPDES) authorization from the MDEQ's Permitting and Compliance Division. The Build Alternatives would disturb up to approximately 0.604 hectares (1.5 acres) of right of way and require a MPDES construction phase permit, which is issued in response to the 1987 re-authorization of the Clean Water Act. The Clean Water Act requires the U.S. Environmental Protection Agency to institute a National Pollutant Discharge Elimination System (NPDES) permitting program for stormwater drainage systems or to approve the state's programs.

## 4.0 Comments and Coordination

The procedures for conducting an Environmental Assessment emphasize cooperative consultation among agencies and the early and continued involvement of people who may be either interested in or affected by the projects. This chapter documents the specific elements of the public and agency involvement program.

### 4.1 AGENCY CONSULTATION

The following agencies were contacted via a letter at the beginning of the study process and were asked to provide information. These agencies were also provided an opportunity to comment on the proposed projects:

- City of Miles City
- Environmental Quality Council Federal Highway Administration
- Montana Fish, Wildlife and Parks (*124SPA* permit)
- Montana Natural Heritage Program
- Montana State Historic Preservation Office
- U.S. Army Corps of Engineers (*Clean Water Act - Section 404* permit)
- U.S. Environmental Protection Agency
- USDA - Natural Resources Conservation Service
- U.S. Fish & Wildlife Service

Responses from these agencies are provided in Appendix D.

### 4.2 COOPERATING AGENCIES

Of the agencies listed above, three were requested and accepted to be cooperating agencies requests based on the possibility of issues of the proposed projects. Cooperating agencies are those that assist in the review process of the Environmental Assessment. These agencies help to determine and review the issues that need to be addressed during the environmental documentation process and how to mitigate impacts to environmental resources that result from the projects. The following are the agencies that are the cooperating agencies for the three proposed projects:

- City of Miles City, Montana
- Montana State Historic Preservation Office
- U.S. Fish and Wildlife Service

### 4.3 PUBLIC INVOLVEMENT

The Public Involvement Plan created for these projects, written in association with FHWA guidance and MDT's Public Involvement Handbook, is provided under separate cover.

As mentioned in previous sections, the City has kept the public informed over the last five years regarding their goal and plans to recirculate and mitigate traffic. Minutes from meetings at which the three improvements projects were discussed are provided in Appendix A.

MDT as part of the NEPA environmental documentation process, facilitated a public open house held on February 28, 2002. A transcript of this meeting is provided under separate cover and available by contacting MDT. The purpose of this meeting was to present to the public the initial design plans and obtain comments and feedback on the plans. In the case of the Wilson and Strevell proposed projects, comments were provided that assisted MDT to make refinements to the alternatives. For example, residents living adjacent to the Wilson Street proposed project asked for the sidewalk to be provided on the south side of the street only.

During and since that public meeting, the City and MDT have received over 100 written comments. These comments, written on comment forms and on personal stationary, are on file with MDT.

To summarize, a large portion of the written comments support the proposed projects. They often cited the following reasons that the projects should be constructed:

- Supports benefits to downtown and economic development
- Need better connection to downtown; eliminates maze
- Improves traffic flow; would help bring two sides of town together
- Helps with congestion; Balances out traffic on other roads
- Increases safety
- Likes sidewalks
- Reduces traffic on Comstock (in front of elementary school)
- Helps direct traffic away from school; improves safety at school
- Improves emergency response time
- Benefits the Community College
- Helps pedestrians near Health Care complex
- Was in original plans and supported by Planning Board and City Council

Others, predominantly residents living adjacent to the Stower Street proposed project, expressed opposition to the project. Those who oppose the projects often listed the following concerns:

- concerned about safety of elementary school students
- concerned about speeding cars
- projects would increase traffic
- projects would diminish adjacent property values
- noise would increase
- don't want to lose trees
- don't want or need more development

An additional opportunity was provided for public discussion of the proposed projects. A discussion was held during the City Council meeting on May 28, 2002, and the public was invited to attend. At that meeting, the design details of the three proposed projects were presented. The City Council approved the three projects, although some public attendees voiced opposition to the Stower Street proposed project.

In summary, the proposed projects are generally well-received and supported by the majority of the Miles City community. Localized effects to adjacent residents and property owners along Stower Street have been voiced as the biggest cause for concern. However, as others have

commented, "It is important to keep the best interest of the City in mind, and the benefits of the three proposed projects outweigh the disadvantages."

#### **4.4 OPPORTUNITIES FOR COMMENTS**

This Environmental Assessment is available to review at the following locations:

- Miles City Library, One S. Tenth Street (Main and Tenth), Miles City
- Miles City Engineering Office, 17 S. Eighth Street, Miles City
- MDT Miles City Office, 217 N. Fourth, Miles City
- MDT Glendive District Office, 503 N. River Ave., Glendive
- MDT Environmental Services Office, 2701 Prospect Ave., Helena
- Custer County Offices, 1010 Main Street, Miles City

In addition, a copy of this document may be purchased at H & T Printing for the cost of approximately ten dollars. H & T Printing is located at 10 North Eighth Street in Miles City between the hours of 8:00 am to 5:00 pm, Monday through Friday.

Written comments related to this document will be accepted during the Public Comment Period between **April 1, 2003 through May 1, 2003**. Please direct comments to:

Jean Riley, P.E.  
MDT Environmental Services  
2701 Prospect Avenue/P.O. Box 201001  
Helena, MT 59620-1001

Email address: JRILEY@STATE.MT.US

Fax number: 406-444-7245

A public hearing will be held during the Public Comment Period at the Miles City Community College on Tuesday, April 1, 2003 in the evening for residents to express their comments verbally. This meeting will be announced in the local papers.

## **5.0 List of Preparers**

The following is a list of the project team that participated in the environmental documentation process for the Miles City proposed projects.

### **Montana Department of Transportation - Environmental Services**

Jean Riley, P.E., Engineering Section Supervisor

Jake Goettle

Tom Atkins, P.E.

### **Montana Department of Transportation - Resources Section**

Jon Axline, Historic Resources

Larry Sickerson, District Biologist

Cora Helms, Air Quality, Noise, Contaminated Sites

### **Montana Department of Transportation – Glendive District**

William McChesney, District Administrator

Ray Mengel, District Engineer

### **David Evans and Associates, Inc.**

Kristin Kenyon, AICP

Saundra Dowling, AICP

Debra Perkins-Smith, AICP

Martha Wiley, AICP

Sue Canniff, Biological Resources

Jacqueline Halvorson, Water Resources

## 6.0 Distribution List

### FEDERAL AGENCIES

DEPARTMENT OF ARMY-CORPS OF ENGINEERS  
Helena Regulatory Office  
301 South Park, Drawer 10014  
Helena, MT 59626-0014  
Allan Steinle, Montana Program Manager

U.S. DEPARTMENT OF AGRICULTURE  
Natural Resources Conservation Service  
109 Railroad Avenue East  
Roundup, MT 59072  
John Rouane, District Conservationist

USDOT FEDERAL HIGHWAY ADMINISTRATION  
2880 Skyway Drive  
Helena, MT 59602  
Dale W. Paulson, Program Engineer

U.S. FISH & WILDLIFE SERVICE  
Montana Field Office  
100 North Park Avenue, Suite 320  
Helena, MT 59601  
Kemper McMaster, Field Supervisor

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region VIII, Montana Office  
301 South Park, Drawer 10096  
Helena, MT 59626-0096  
John F. Wardell, Director

### STATE AGENCIES

MONTANA DEPT OF ENVIRONMENTAL QUALITY  
Lee Metcalf Building  
1520 East Sixth Ave., P.O. Box 200901  
Helena, MT 59620-0901  
Jan Sensibaugh, Director  
Tom Ellerhoff, Administration Officer

MONTANA DEPARTMENT OF NATURAL  
RESOURCES AND CONSERVATION  
Southern Land Office  
Airport Park, Building IP 9  
Billings, MT 59105  
Attn: Don Kendall, Area Manager

MONTANA ENVIRONMENTAL QUALITY COUNCIL  
Office of the Director  
Capitol Post Office  
P.O. Box 215  
Helena, MT 59620

MONTANA GOVERNOR'S OFFICE  
State Capitol – Room 204  
Helena, MT 59620-0801

MONTANA FISH, WILDLIFE & PARKS  
PO Box 1630  
Miles City, MT 59301  
Don Hyyppa, Regional Supervisor

NATURAL HERITAGE PROGRAM (MNHP)  
Montana State Library  
1515 East Sixth Avenue  
Helena, MT 59620  
Margaret Beer, Data Manager

STATE HISTORIC PRESERVATION OFFICE  
1410 8<sup>th</sup> Avenue, P.O. Box 201202  
Helena, MT 59620-1202  
Attn: Mark Baumler, Historian

### LOCAL AGENCIES

CITY OF MILES CITY  
17 South Eighth Street  
Miles City, MT 59301  
Pat Rogers, Public Works  
John Marks, Planning

