

**Volume III**  
**Appendix D Part 2**  
**Response to Comments**

**Kearl**  
**Module Transportation Project**  
**Finding of No Significant Impact**

**Module Transport and  
Required Utility and Road Modifications**



February 2011

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## D.2 Electronically Submitted Letters, E-Mails, and Transcripts of Telephone Calls and Messages

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1 { Why should you ask for comments, just do the transport. The complainers can use another road to get to their destination. Just having a pulse makes some idiots complain.

Mary Anne Aafedt  
[Maafedt1952@gmail.com](mailto:Maafedt1952@gmail.com)  
 Helena, MT

**AAFEDT, MARY ANNE**

1. Comment Noted

Please put these comments in the record:

An EA is not an adequate assessment of this project.

- 1 { 1) Damage to rivers and stream beds have not been assessed
- 2 { 2) This should be considered a federal, not just a state, project
- 3 { 3) Long term road and bridge damage has not been addressed
- 4 { 4) The long range implications of a "high and wide" corridor
- 5 { 5) damage to wildlife along Hwy 12, a major animal corridor, has not been addressed.
- 6 { This project should have a full EIS assessment.

Thank you,  
 Carla Abrams  
 Missoula MT 59802

**ABRAHMS, CARLA**

1. See responses to Common Comment I and O.
2. See response to Common Comment A.
3. See responses to Common Comments L and M.
4. See response to Common Comment K.
5. See response to Common Comment I.
6. See response to Common Comment B.

PRIOR MSG. SENT WITHOUT SIGNATURE AND CONCLUDING REMARKS. SEE BELOW, BENEATH LINE....

Dear MDT Staff and Tom Martin:

Do NOT issue the permit for moving the gargantuan tar sands equipment over Montana highways. Not over any MT highways.

- 1 { Reasons: Practical: (1) We absolutely should not destroy the new roadwork (widening, paving) between Four Corners and Augusta.
  - 2 { (2) Do not degrade the surfaces and roadbed of all other MT highways over which this huge equipment passes
  - 3 { (3) Do not tie up local and cross-country traffic through MT for a year and a half for this purpose
- Moral: MT should not, by issuing a transport permit, subsidize the environmental destruction coal tar development in Canada will bring.
- This is an outrageous proposal and should be denied for reasons noted above and for a host of environmental and global warming issues not mentioned here but submitted by others.

Thank you for listening. Thank you for DENYING the permit.  
Bob Adams  
1029 State Street  
Helena, MT 59601  
406-443-3248

**ADAMS, ROBERT**

- 1. See response to Common Comment L. Module movement will not destroy the new road work.
- 2. See response to Common Comment G.
- 3. See response to Common Comment E1 and P.

To the Montana Department of Transportation  
Re: Public Comment on Kearl Module Transport Project Environmental Assessment  
May 14, 2010

I am writing on behalf of Adventure Cycling Association, headquartered in Missoula, Montana. Adventure Cycling is the largest membership cycling non-profit in North America, with 44,500 dues paying members. Our non-profit charitable mission is to inspire people of all ages to travel by bicycle.

- 1 { We believe that the current EA under consideration is deficient in many ways and is not an adequate tool for determining the environmental, tourism, cultural and economic impacts of the enormous Kearl Project. In particular, this project will have a major impact
- 2 { on Montana tourism in general and specifically on bicycle travel, which is a major activity throughout Montana and nationally.

**ADVENTURE CYCLING ASSOCIATION,  
JIM SAYER**

- 1. Comment noted.
- 2. See response to Common Comment M.

3 { The planned Kearsarge corridor will directly impact at least 175 miles of bicycle travel routes that have been mapped by Adventure Cycling since 1976. They include the Trans America Trail (<http://www.adventurecycling.org/routes/transamerica.cfm>), the Great Parks North Trail (<http://www.adventurecycling.org/routes/greatparks.cfm>), the Lewis & Clark Trail (<http://www.adventurecycling.org/routes/lewisandclark.cfm>), and the Great Divide Mountain Bike Trail, the longest mapped mountain bike route in the world (<http://www.adventurecycling.org/routes/greatdivide.cfm>). Every year, thousands of cyclists use these routes because they are relatively safe and quiet, with low vehicle traffic volumes, and only intermittent truck traffic. This could radically change with the addition of hundreds of huge vehicles on scenic, bike-friendly highways like Highway 12 and Highway 200. There are no safe, nearby alternatives for cyclists to these corridors, which would now be dominated by wide-load truck traffic carrying the modules.

4 { Deterring thousands of high value tourists from cycling the roads of Montana would be economically detrimental to countless Montana businesses, including restaurants, markets, campgrounds, hotels, and bicycle and camp stores. It has been documented in a number of states around the country that bike travel is a large and growing tourism sector. Bicycle tourists tend to have higher average discretionary incomes. Overnight bicycle travelers spend more than average tourists (on average, \$98 per day for the bicycle tourist versus \$60 per day for a tourist traveling by motor vehicle) because of their added need for shelter and other services. States with a reputation for excellent cycling can reap huge economic rewards. A report released in January 2010 demonstrated that the State of Wisconsin realizes \$530 million annually from out-of-state visitors who come to Wisconsin to bicycle on quiet country roads ([http://www.bfw.org/uploads/media/Valuing\\_Bicycling\\_in\\_Wisconsin\\_Final\\_Report\\_January\\_2010%5B1%5D.pdf](http://www.bfw.org/uploads/media/Valuing_Bicycling_in_Wisconsin_Final_Report_January_2010%5B1%5D.pdf)). Other places that have emphasized bicycle travel – from Summit County, Colorado to Quebec Province in Canada -- are reaping large financial returns by promoting cycling, especially in rural, undeveloped areas, such as the terrain that the Kearsarge Project would impact.

5 { The EA utterly fails to address the harmful impact of the Kearsarge Project on bicycle tourism and the Montana communities that benefit from this environmentally low-impact activity. The EA also fails to address the broader impact on Montana's reputation as a tourism mecca. At a time when the State of Montana is advertising its scenic attractions on billboards and buses from Chicago to Seattle, there appears to be no focus on the reputational damage that will occur to the "Last Best Place" by allowing an extraordinary peleton of massive module-carrying vehicles on what are now relatively quiet, low-traffic rural highways.

3. The proposed route is an existing transportation corridor that currently facilitates oversized and commercial loads. The KMTP moves would occur at night on most of the routes. Impacts to bicyclists are not expected.

4. See response to Common Comment M.

5. See response to Common Comment M.

<p>6 { Adventure Cycling Association strongly urges MDT and all appropriate agencies to subject this massive and disruptive project to a full Environmental Impact Study (EIS) process, as mandated under the National Environmental Policy Act.</p> <p>Jim Sayer          Executive Director  <a href="mailto:jsayer@adventurecycling.org">jsayer@adventurecycling.org</a>          t. 800 755 2453 ext 201 or 406 721-1776 x201          150 East Pine Street, Missoula, Montana 59802  <b>Adventure Cycling Association</b>  <i>Inspiring people of all ages to travel by bicycle</i></p>	<p>6. See responses to Common Comments A and B.</p>
<p>MDTCommentsKearl May 14, 2010</p> <p>1 { I am a resident of Ovando, former resident of Potomac, and have read the environmental assessment regarding the Kearl project. It seems to me to be a document that was designed from the outset with an attitude to accommodate this company rather than to truly consider the interests of the residents of the state of Montana and the potential environmental and safety impacts. The alternatives cannot be described as “unfeasible” just because they would cost the company more money. The EA does not do its job objectively if it merely parrots the point of view of the company. A truly objective full Environmental Impact statement should be prepared before this proposal is considered by the Montana State Department of Transportation. There are indeed alternatives for this company and even if there were not it is the job of our state government to protect our state not to cow tow to every corporation that wants to use us for their own purposes even if that use constitutes an abuse.</p> <p>2 { The routes that they propose to use through Idaho and Montana were not designed for interstate commerce as were the interstate highways. These are local scenic routes along relatively narrow roadways through fragile rural, montane and riverine ecosystems that will be damaged by this intrusion of extremely heavy large dimension cargo both by their shear mass, the proposed road alterations and the risk of accident, and allowing this ‘one time’ use sets a very dangerous and unacceptable precedent for other companies to presume they can use these routes for similar purposes with similar potential negative impacts on the environment and quality of life of our residents. Having turn-outs added to the roadway every 5 miles is not a ‘lasting benefit’ to us and their construction and use hold the potential to endanger the Blackfoot river at several of the proposed locations, especially near the Sperry access. The statement that the new turn outs would always be at least 100’ from streams, irrigation canals or wetlands seems highly unlikely to be possible in all cases as the highway comes very close to the river at several points along its course. The EA again did not</p> <p>3 {</p>	<p><b>AITKEN, DONA BOGGS</b></p> <p>1. See response to Common Comment B.</p> <p>2. See responses to Common Comments H1, H2, D2, and K.</p> <p>3. See responses to Common Comments, I, O, and K.</p>

4 { do its job when it stated there would be “no impact” expected on water resources. It is their job to consider the impacts of construction and potential tip-overs in ‘worse case scenarios’. At public meetings there was a suggestion by MDT that the turnouts could be removed after this year long project is over, implying some recognition of their negative impact and yet in the EA statement they are listed as a lasting benefit. You can’t have it both ways and I don’t think anyone believes that once there they would ever be removed and doing so could recreate the potential hazards to the river that putting them there in the first place caused.

5 { Removal of overhead signage on interstates is accepted as inconsequential by the EA providers eager to accommodate this company rather than being objectively considered with respect to the safety issues for drivers. Overhead signs were much more expensive to put up in the first place when the option of roadside signs was always there. Hence there was a good reason for doing it and that probably was because it much improves visibility to all drivers reducing errors in navigation that can lead to accidents.

6 { These scenic routes are used by our tourist industry that would be negatively impacted by the big rigs. They are also used by bicyclists and other recreationist all sorts, by school buses, farm equipment and all manner of such uses typical of rural roads and not typical of interstate highways that were designed for interstate commerce use in contrast to these routes that were not. This fact alone implies innumerable safety hazards that have been all too readily dismissed by this less than objective EA report. We deserve better than that and we demand better than that from our state government.

Dona Boggs Aitken  
609 Old Trailhead Road  
Ovando Mt 59854

1 { I forgot to mention another concern about the big rigs coming through highway 200 at night. I know from personal experience using this road late at night that there are numerous elk herds along this highway, with one of the largest herds regularly hanging out ON and beside the highway at night between Clearwater junction and the Sperry access. They are especially likely to be there in winter when it can be difficult to stop in a small car let alone a 600,000 lb big rig with tremendous inertia. Hence I submit it is extremely likely that these big rigs will kill hundreds of elk along this route at night. Just one more negative environmental impact not considered in your inadequate biased EA.

Dona Boggs Aitken  
609 Old Trailhead Lane  
Ovando MT

4. Comment noted.

5. Signs would be modified or replaced in a manner to maintain safety to the traveling public.

6. See responses to Common Comments G, H2, H3, J, and M.

**AITKEN, DONA BOGGS**

1. See wildlife section in response to Common Comment I.



609 Old Trailhead  
Ovando, MT 59854  
2010-05-14  
406 793 5836

**AITKEN, GARY**

MDT Environmental Services Bureau  
P.O. Box 201001  
Helena, MT 59620-1001

Dear Sirs:

This letter is to comment on the proposed Kearl Module Transport Project Environmental Assessment.

Please include this letter in its entirety in the official record.

**Perspective**

This EA was clearly prepared from an entirely inappropriate perspective. It begins with the statement in the abstract:

“The purpose of the proposed project is for Imperial Oil to improve Montana infrastructure to facilitate a safe and efficient movement of over-dimension loads (height, widths, and weight) through Montana to the Canadian border and return trailers through Montana to the Idaho border.”

This is absolutely not the case. The purpose of this project is to allow Imperial / Exxon to save money by moving oversize structures which were built overseas, but which could have been built in Canada or the United States and not required travel over this route, by the least expensive means to their project in Alberta.

MDT and Imperial/Exxon stressed in their presentations at public hearings that this was a one-time event, not a long term plan. That statement directly contradicts the purpose stated in the abstract: "... to improve Montana infrastructure to facilitate a safe and efficient movement of over-dimension loads". If the purpose was to improve Montana infrastructure to facilitate a safe and efficient movement of over-dimension loads, one would spend a significant effort doing long-range planning to decide where we want to route over-dimension loads for the next 50 or so years. No such study was even undertaken. That should have been the first step in this process. We already have a highway system specifically designed for carrying industrial traffic – the interstate highway system. Any plans for the movement of major quantities of oversized and overweight industrial equipment which are incompatible with the existing industrial route should seriously investigate, in depth, the challenges and costs involved in upgrading the designated industrial route so that it may handle that traffic.

1. See response to Common Comment C2.
2. See response to Common Comment D2 and C2.

<p>3 { The modifications proposed in this EA would turn some of our scenic highways into alternate industrial corridors. As such, this is a long-term decision affecting all Montana citizens for generations to come. Surely we can do a little long-range planning to route industrial traffic where it belongs – where it has the least impact in the long term, not the least cost to the largest corporation in the world in the short term..</p>	<p>3. See responses to Common Comment J and K.</p>
<p>The EA states</p> <p>"Since the returning haul trailers ..., the interstate return trailer route was selected to minimize public impacts and for efficiency."</p> <p>4 { This clearly implies that the interstate is both more efficient and has fewer public impacts. As the recognized industrial transportation corridor, it should be the chosen route for module transport as well as the return vehicles. MDT's first responsibility is to the long-term interests of Montana and its citizens, not to minimize Imperial / Exxon's costs. It has clearly abrogated its obligation to do long range planning, which would involve asking the question</p>	<p>4. See response to Common Comment D2. See Section 4 of Decision Document regarding clarification of return trailer route.</p>
<p>"Where do we want monster industrial traffic traveling?"</p> <p>5 { Indeed, this is a golden opportunity to do just such planning and finance some of this beneficial and needed work.</p>	<p>5. Comment noted.</p>
<p>6 { In section 2.2, under "Alternatives Considered in Detail", the alternative routes are dismissed as being "infeasible". Worse, the alternatives of manufacture in various places in North America are not even mentioned. None of the alternatives is, in fact, infeasible. All of them would be more expensive for Imperial / Exxon. Again, MDT's primary responsibility is not Imperial / Exxon's bottom line; it is the long-term interests of Montana citizens.</p>	<p>6. See responses to Common Comments D1, D2, and D3.</p>
<p><b>Need</b></p>	
<p>The abstract further states:</p>	
<p>"...The proposed project is <i>needed</i> to transport specialized processing equipment through Montana to Alberta, Canada." [emphasis added]</p>	
<p>7 { To the contrary, the project is definitely not needed. It is <i>desired</i>, by Imperial / Exxon. It is not desired in any way by many Montana citizens, whose long-term well-being should rightfully be MDT's primary responsibility.</p>	<p>7. Comment noted.</p>

**Required Sourcing in Korea**

The EA states

“The overall Kearl Project involves ... specialized manufacturing capability ... that *require* sourcing of various pieces of equipment including modules that are manufactured in Korea.” [emphasis added]

8 { Nothing about this project *requires* sourcing anything in Korea. Imperial / Exxon stated in the public hearing in Lincoln that the modules could just as well have been manufactured in Edmonton, AB, Canada, thousands of miles closer to the site where they will be used. A site that by their own admission had the capability to manufacture them. They are manufactured in Korea solely to save money. At the public hearing in Lincoln, Imperial / Exxon was asked about this directly -- "What would you do if you were not allowed to use this route?" The answer was they would have to consider other options, not that they would have to abandon the project.

Consequently, the perspective used by MDT when evaluating this project, that it is required and must somehow be accomodated, is false.

The EA touts the economic benefits due to road projects from this project. But no comparative data is available for economic benefits should the modules be constructed in Canada or the United States. Imperial / Exxon refused to even hint at the cost savings they are obtaining by manufacturing overseas. Those numbers are huge direct economic losses to North America, far in excess of any benefits obtained by this small transportation project.

**Benefits**

9 { The EA goes to great pains to present supposed long-term economic benefits of this project. In doing so, it totally ignores the negative impacts of converting two of our scenic corridors (highway 12 and highway 200) into industrial corridors. It justifies this by saying this is a one-time event, and that it may require Imperial / Exxon to remove some of the “improvements”.

"Turnout and road modifications include construction ... to allow adequate turning radius for the load *and other* long vehicles." [emphasis added]

What *other* long vehicles? This implies permanent changes to accommodate future industrial loads.

10 { The discussion of adverse impacts is limited to direct impacts of solely the 200 loads Imperial / Exxon is seeking to use under this permit. It totally ignores long-term adverse impacts of increased industrial traffic. We are 100% guaranteed to have increased long-term industrial traffic as a result of this project – other firms have already applied for permits to use this route to get oversized equipment to the tar sands area in Canada.

8. See response to Common Comment D3.

9. See response to Common Comment K.

10. Please see response to Common Comment K

11 { The EA touts economic benefits due to road modification construction projects. Because it fails to do any in-depth evaluation of alternatives such as the existing interstate industrial corridor, no data is available for comparison. It is virtually certain that the economic benefits due to this project are a pittance, both short- and long-term, when compared to those from improving the existing industrial corridor along the interstates. In particular, modifying highway overpasses on the interstates through Montana to add on- and off-ramps would have massively greater economic benefits in terms of construction jobs and long-term economic visitation to the surrounding areas. It would increase property values along this already designated industrial corridor, and provide additional opportunities for businesses serving the interstate highway system. As such, the people of Montana are being shortchanged in this analysis, similar to the pittance given to Native Americans in exchange for their valuable lands years ago. We are being exploited almost as a third world nation.

**Ten Minute Rule**

12 { The EA takes great pains to mention, many times over, the MDT ten minute rule for traffic delays.  
 "The proposed project must adhere to a 10-minute maximum traffic delay rule and minimize potential for adverse impacts to the built and natural environment, the public, local businesses, and current uses."  
 Yet the proposal is full of data showing that it will be guaranteed to violate that rule. The maximum speed is stated as 30 mph. That means a maximum distance between pull-outs of 5 miles. Furthermore, as any 16 year old can tell you, you do not accelerate a 600,000 pound load from zero to 30 mph very quickly regardless of your monster trucks hauling the load. As any Montana resident who has braked to avoid a deer, elk, moose, bear, or other animal can tell you, you do not decelerate very quickly either. In addition, speed must be reduced to 5 mph over bridges. Finally, there are both uphill and steep downhill grades involved, further slowing travel. The obvious conclusion is that the maximum distance between pull-outs must be significantly less than 5 miles. If average speed between two pullouts is reduced to 25 mph, the pullouts must be a maximum of 4.2 miles apart.  
 The EA lists eight distances between pull-outs which are over 5 miles apart, and more when you look at a more realistic limit such as 4.2 or 4.5 miles. Consequently, the proposal is guaranteeing it will violate the MDT Ten Minute Rule in numerous places along the route.  
 If these simple calculations concerning a significant portion of the EA are representative of the quality of the overall work in this EA, it should be rejected out of hand as

11. See response to Common Comment D3.

12. See response to Common Comment G and Appendix 2 of the MTP.

insufficient, inaccurate, and totally inadequate; and the quality of the engineering firm which prepared it as totally unacceptable.

**Distances to Streams**

13 { The existing turnout at mile marker 62.9 on highway 200 is not 137 feet from the stream; it is directly adjacent to a backwater directly connected to the stream, approximately 20' away. This may be ascertained easily from aerial photos or Google Earth. There is always water from the river in this area, and it floods through this area during spring high water.

13. See response to Common Comment O.

**Bridge Integrity**

The extreme weight and length of these modules is passed off on pp 4, Table 3, section 1.6.2, with the simple statement "Requires Bridge Bureau Approval." Indeed, the total weight of a truck plus module is not even listed in the EA; only the (misleading) module weight alone is given. When the trailer weight is also considered, the total weight is in excess of 600,000 pounds. According to the EA, MT DEQ has stated that

"...the loads may be too heavy for some of the bridges and he was afraid that might lead to water pollution or a possible spill..."

Yet no additional investigation or supporting data appears to have even been undertaken.

14 { From the national bridge inventory, the route along highway 200 contains bridges rated as H 15, HS 15, HS 20, and HS 20+Mod, plus one rated Unknown. The length of some of these bridges is more than the length of the trailers in this project, meaning the entire weight must be born by the structure alone. No data is provided to even remotely address this issue. The only hint of concern is the speed reduction to 5 mph, even less than the uphill speed. The obvious implication to any engineer is that speed is being reduced to hopefully prevent structural damage from vibration under extreme load. A vibrating extreme load is the equivalent of an earthquake whose epicenter is on the bridge. Some of these structures were built as far back as 1939 and 1949, and were in no way designed to handle loads in excess of 600,000 pounds. According to the Montana department of commerce,

"There are over 5,200 bridges in Montana. Of these, 85 percent (4,433) receive regular inspections in accordance with federal guidelines. Nearly 25 percent of the inspected bridges are rated as "structurally deficient" or "functionally obsolete."

"While counties delay funding to maintain, reconstruct or replace the most deficient bridges, the bridge inventory continues to age. We simply are not repairing or replacing our bridges at anywhere near the same rate at which they are deteriorating."

14. See response to Common Comment L. MDT has approved the axle loadings on the transporters for travel over the proposed route.

Yet bridge integrity is not even addressed, despite specific concerns having been mentioned.

**Financial Responsibility**

In section 2.2.1.2 the EA states

"Once hauling is complete, Imperial Oil will pay for any needed repairs to roadways and bridges due to their activities ..."

15 { Unfortunately, damages to roads and road structures are often not readily apparent. Bridges may be weakened or internally damaged, with no obvious outward signs showing for a significant period of time, sometimes years. When the damage is finally apparent, the company responsible for it has long since been absolved of its responsibility, gone bankrupt, or been dissolved after being bled of its assets by its controlling interest. As demonstrated in its more than ten year procrastination and legal wrangling over the *Exxon Valdez* damages, which it eventually lost, Exxon is not likely to voluntarily assume responsibility for any delayed appearing damages.

15. See response to Common Comment L.

**Sign Bridge Removal**

16 { Two sign bridges are to be removed on Interstate 90. Since sign bridges are considerably more expensive to build than roadside signs, they were almost certainly installed in the first place for improved public safety. Replacing them with roadside signs would therefore make these routes less safe. MDT is choosing to put the Imperial / Exxon bottom line ahead of the public safety of Montana citizens. What was once deemed a benefit for public safety is now deemed unnecessary for Imperial / Exxon's short-term economic benefit.

16. Signs would be modified or replaced in a manner to maintain safety to the traveling public. . It should be noted that the two sign bridges on I-90 would be re-installed following project completion. Also, see Section 4.3 of the FONSI.

**Spills**

17 { Under "Contaminated Sites / Hazardous Waste", the EA states there will be a slight risk of spill with minimal impacts. Some of the most likely places for accidents and spills are immediately adjacent to the river along highway 200. You cannot have a minimal impact in that case. Furthermore, under "Wildlife and Fisheries" the EA states that no impact is expected. You can't have no impact if you have even a slight risk of spill.

17. See response to Common Comment H1.

**Accident Prevention**

18 { The EA does an admirable job of talking about spill prevention and clean-up plans, and of agencies to be contacted when something goes wrong. Unfortunately, as the leaking oil well in the Gulf of Mexico and mine tailings blowouts have repeatedly demonstrated, plans are often totally inadequate when priceless natural resources are involved. Contacting agencies may relieve one of some legal responsibilities, but it does little to mitigate the disaster.

18. See response to Common Comment H1.

**Emergency Traffic**

19 { The assumption when discussing emergency traffic is that everything will be working according to plan. This may well not be the case. Emergencies tend to be of higher frequency during bad weather, precisely the time when road conditions are difficult and accidents / problems with the modules are more likely. The EA states that modules will not travel when weather does not permit, but weather changes quickly and those are objective decisions easily made in error and pushed past prudent behavior when huge economic consequences of delays are bearing down. What will the response be when a module totally blocks the road and cannot be moved in a timely manner?

19. See responses to Common Comments H1, H2, and H3.

**Photographs**

20 { Figure 2, on pp 13, is presented as representative of the oversized loads. This is hardly the case. It is relatively small, being only about 18 ft wide and 22 ft high (estimated). To illustrate the potential impacts, a photo of the largest load should be used, both head on and from the side, with both passenger vehicles and a standard tractor-trailer present for comparison.

20. Appendix E of the EA has several drawings that show the perspective of the module size next to a standard commercial vehicle.

**Traffic Control Officers**

21 { Will additional highway patrol officers be hired? If not, this is a diversion of officers already stretched and needed for other normal duties.

21. Imperial Oil will enter into a contract with Montana Highway Patrol to pay for vehicles, gas, and salary (including overtime pay). Off duty Patrolmen will be used on a voluntary basis, therefore it will not impact normal Highway Patrol services.

**Out-of-hand Rejection of Other Alternatives**

22 { Discussion of all alternatives simply indicate that an obstruction was found, no possible detours exist, and the entire route rejected. One could do the same thing with the preferred route being discussed.  
Instead, construction is being undertaken to make the route feasible. For the alternative routes, the obstructions could be replaced with new facilities which could pass the modules, just as is being proposed for this route. Such construction might take longer, and / or be more expensive for Imperial / Exxon, but that is their problem, and of no concern to MDT and the people of Montana. Indeed, given the amount of traffic the tar sands project is likely to generate, such improvements, if one takes the "long term benefits" touted in this EA for Montana as truth, would be net benefits to either Canada or Montana and highly desirable. For the alternative along the interstate through Montana, building on/off ramps for existing overpasses along the interstate highway system is likely the best, and most suitable, expenditure of effort.

22. See responses to Common Comments D1, D,2 and D3.

**Wildlife Impacts**

23 { The discussion of wildlife impacts limits itself to the actual construction work for infrastructure modifications. No mention is made of the long term impacts of increased industrialized use of the highway 200 and highway 12 corridors. There will undoubtedly be increased wildlife mortality due to collisions with the increased number of vehicles over the long term. Anticipating such problems would call for, at a minimum, the construction of wildlife over- or under-passes in several locations.

Elk, deer, and bear are routinely encountered and killed on these roads during the hours proposed for travel. Due to load inertia and the difficulty of stopping, numerous animals could be killed in a single encounter. At times an entire herd of elk is milling about in the roadway.

**Summary**

In short, this project has about as much long term benefit to the citizens of Montana as a case of brain cancer.

Respectfully, Gary Aitken

The Alberta Pressure Vessel Manufacturers’ Association (APVMA), founded in 1987, is an industry association comprised of twenty major Alberta pressure vessel and heat exchanger manufacturers. Information about the association is available at [www.apvma.ca](http://www.apvma.ca).

It should be noted that pressure vessels and heat exchangers are the main process elements built into the modules being manufactured in South Korea.

The pressure vessels and heat exchangers built in Alberta have in many cases involved unique designs and materials being in many cases designed for a specific specialized purpose. Our members are “world class” and noted around the world for manufacturing “world class” products.

Complementing our sector is a highly experienced modular construction industry that has fabricated large complex modules for the oil sands and other related energy projects for many years. It would be safe to say that there have been thousands of modules designed, assembled, delivered and installed on project sites in Alberta.

1 { Our main concern is the reasoning utilized by the Kearn Lake Project’s owner Imperial Oil to justify the manufacture of these modules in South Korea. Imperial Oil has said that the modules require “very specialized fabrication” by a large manufacturer with a proven record for assembling this particular equipment and that specialized manufacturing was required that couldn’t be done in Canada. We do not believe that these are the true reasons for Imperial Oil's decision as Alberta’s pressure vessel and heat exchanger industry is “world class” and the

23. See wildlife section in response to Common Comment I.

**ALBERTA PRESSURE VESSEL MANUFACTURERS' ASSOCIATION, BOB SAARI**

1. Comment noted.



modular construction industry has built thousands of units that are operating today. There is absolutely no doubt that these modules could have and should have been built in Alberta.

- 2 { An additional concern is the route proposed for these modules. This is not a “one shot” project!  
 This route will become the “highway” for energy related products from not only South Korea  
 3 { but even lower wage suppliers such as China and Vietnam. This will not only hurt employment  
 in our industry in Alberta, but will also have a major impact on the large pressure vessel and  
 heat exchanger industry in the United States.

Better reasons than those provided by Imperial Oil should be required to justify the inconvenience to the public that will be the result of the transportation of these modules through Washington, Idaho, Montana and Alberta.

R.W. Saari, P.Eng.  
 Manager, APVMA  
 Alberta Pressure Vessel Manufacturers' Association  
 5815 - 143A Street  
 Edmonton, AB  
 T6H 4G4  
 Phone: 780/438-4196  
 Email: [vessels@apvma.ca](mailto:vessels@apvma.ca)

2. See response to Common Comment K.  
 3. Comment noted.

Many of my comments are reflected in the City of Missoula’s resolution submitted as a comment however, as an individual I want to make three points--one emphasizing a conclusion of the resolution and two on subjects not covered in the resolution explicitly.

- 1 { 1. The scope of the EA is fatally limited. From its inception, the Exxon project has been conceived of as a permanent corridor. The corroborating evidence exists throughout the record, including MDT Directory Lynch’s presentation to the Montana Legislature as well as in the Port of Lewiston’s application for ARRA funds to expand its port. The only place where the Exxon project is evaluated as a disconnected request for a one-time permit from one Montana border to another is in the official document reviewing its impact. MDT must use common sense (as authorized by the State of Montana’s Administrative Rules) to develop a document evaluating the project that will be impacting Montanans--not the fictional segment of the project the applicant has defined exclusively for the purpose of review.

**ALDERMAN, WARD ONE, MISSOULA – JASON WIENER**

1. Comment noted.

2. The cumulative impacts of the transport project include the massive releases of greenhouse gas that will be facilitated by the installation of the equipment being transported. The omission of any consideration of this project's impact on climate change and that process's impact on Montanans is negligent. Accelerating the pace of climate change is a reasonably foreseeable outcome of the state's proposed action, a cumulative outcome that will impact Montanans and diminish their constitutionally guaranteed right to a clean and healthful environment.
3. The applicant should be denied the 32J permit requested because, although the EA fails to consider potential accidents and the negative impacts to Montana's multi-billion dollar tourism industry, the negative impacts to the existing livelihoods of Montanans are beyond the scope of what can be mitigated by the applicant.

Thanks for your consideration.

Regards,

J.

**Jason Wiener, Alderman, Ward One**

**1238 Jackson St.**

**Missoula, MT 59802**

**(406) 542-3232**

2. See response to Common Comment P.

3. See response to Common Comments H1, H2, H3, M, and G.

May 14, 2010

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

Dear Mr. Martin;

Sent via email, please acknowledge that you received these comments.

Thank you for this opportunity to comment on the Kearsarge Module Transport Project. Please accept these comments from me on behalf of the Alliance for the Wild Rockies and Native Ecosystems Council on the proposal by Imperial Oil/Exxon Mobil to run 200 super-sized trucks through parts of western Montana to the Canadian oil fields. We believe that an Environmental Impact Statement (EIS) must be completed for this project examining the full impact of this project in Montana and Idaho.

The Alliance for the Wild Rockies, Montana Ecosystem Defense Council and Native Ecosystems Council (collectively "Alliance") submit the following comments to guide the development of the environmental analysis for the proposal. The MT Department of Transportation must complete a full environmental impact statement (EIS) for this Project because the scope of the Project will likely have a significant individual and cumulative impact on the environment. Because federal money will be used for this project since Montana receives Federal Highway money, we believe the National Environmental Policy Act applies. Alliance has reviewed the statutory and regulatory requirements governing the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA), as well as the relevant case law, and compiled a check-list of issues that must be included in the EIS for the Project in order for the DOT's analysis to comply with the law. Following the list of necessary elements, Alliance has also included a general narrative discussion on possible impacts of the Project, with accompanying citations to the relevant scientific literature. These references should be disclosed and discussed in the EIS for the Project.

I. NECESSARY ELEMENTS FOR PROJECT EIS:

- 2 { A. Solicit and disclose comments from the Montana Department of Fish, Wildlife, and Parks regarding the impact of the Project on fish and wildlife habitat;
- 3 { B. Solicit and disclose comments from the Montana Department of Environmental Quality regarding the impact of the Project on water quality;

**ALLIANCE FOR THE WILD ROCKIES,  
MICHAEL GARRITY; NATIVE  
ECOSYSTEMS, SARA JOHNSON;  
MONTANA ECOSYSTEM DEFENSE  
COUNCIL, STEVE KELLY**

- 1. See responses to Common Comments A and B.
- 2. See Section 4.5 of the Decision Document,
- 3. Comments were solicited from MDEQ when the EA was distributed on April 13. See Table 2 of the Decision Document.

<p>4 { C. Disclose the biological assessment for the candidate, threatened, or endangered species with potential and/or actual habitat in the Project area;</p> <p>D. Disclose the biological evaluation for the sensitive and management indicator species with potential and/or actual habitat in the Project area;</p> <p>E. Disclose the results of the field surveys for threatened, endangered, sensitive, and rare plants in each of the project area;</p> <p>F. Disclose the level of current noxious weed infestations in the Project area and the cause of those infestations;</p> <p>G. Disclose the impact of the Project on noxious weed infestations and native plant communities;</p>	<p>4. See response to Common Comment I. Biological Assessments and Biological Evaluations are requirements for certain federal agency NEPA documents.</p>
<p>5 { H. Disclose the expected amount of detrimental soil disturbance in each unit after ground disturbance and prior to any proposed mitigation/remediation;</p> <p>I. Disclose the expected amount of detrimental soil disturbance in each unit after proposed mitigation/remediation;</p> <p>6 { J. Disclose the analytical data that supports proposed soil mitigation/remediation measures;</p> <p>K. Disclose the timeline for implementation;</p> <p>7 { L. Disclose the funding source for mitigation/remediation proposed;</p>	<p>5. All construction activities occur in areas of previous soil disturbance. See responses to Common Comments I and O.</p> <p>6. See Section 2.2.1.8 of the EA.</p> <p>7. See response to Common Comment L.</p>
<p>8 { M. Disclose the impact of climate change on the efficacy of the proposed project;</p> <p>N. Disclose the impact of the proposed project on the carbon storage potential of the area;</p> <p>O. Disclose the baseline condition, and expected sedimentation during and after activities, for all streams in the area;</p>	<p>8. See response to Common Comment P. Carbon storage potential of the area is outside the scope of the MEPA analysis.</p>
<p>9 { The Clean Water Act requires that federal agencies or state agencies which receive federal money comply with its provisions. The agency must protect water quality and comply with state water quality standards. Marble Mountain Audubon Soc. v. Rice, 914 F.2d 179, 182 (9th Cir. 1990); Oregon Natural Resources Council v. U.S. Forest Service, 834 F.2d 842, 848 (9th Cir. 1987); Northwest Indian Cemetery Protective Ass'n v. Peterson, 794 F.2d 688, 697 (9th Cir. 1987); 33 U.S.C. 1323(a) ("Each department, agency, or instrumentality of the executive [branch] . . . shall be subject to, and comply with, all Federal, State, interstate, and local requirements, administrative authority, and process and sanctions respecting the control and abatement of water pollution").</p>	<p>9. See response to Common Comment O.</p>

9 { Section 303(d) of the CWA (33 USC §1313(d)) requires that states list water quality limited segments of bodies of water within its jurisdiction. The listed segments are not meeting state water quality standards or failing to meet designated uses due to identified reasons. The states are required to develop Total Maximum Daily Loads (TMDL) for these waters (33 USC Sec 1313 (d) (1) (c)). TMDLs are designed to address all sources of pollution limiting the water quality of the public waters and should include point and non-point sources of pollution, such as sediment generated from logging activities. In the absence of a TMDL federal agencies have a duty to avoid further degradation of WQLS stream segments. The Highway 69 project could violate this duty and thereby violates the CWA if the project puts more sediment into the Boulder River a WQLS or 303(d) listed stream.

See previous page

Federal anti-degradation regulations issued under the Clean Water Act require full maintenance and protection of existing uses from both point and non-point sources of pollution. (40 C.F.R. 131.12).

10 { This project will adversely modify critical habitat for bull trout and lynx. Please conference with the U.S. Fish and Wildlife Service. Please formally consult with U.S. Fish Wildlife Service on the impact on grizzly bears, lynx and bull trout.

10. See response to Common Comment I.

WEEDS

11 { Please address the ecological, social and ascetic impact of current noxious weed infestations within the project area. Include an analysis of the impact of the actions proposed by this project on the long and short term spread of current and new noxious weed infestations. What treatment methods will be used to address growing noxious weed problems? What noxious weeds are currently and historically found within the project area? Please include a map of current noxious weed infestations which includes knapweed, Saint Johnswort, cheat grass, bull thistle, Canada thistle, hawkweed, hound's-tongue, oxeye daisy and all other Category 1, Category 2 and Category 3 weeds classified as noxious in the MONTANA COUNTY NOXIOUS WEED LIST. State-listed Category 2 noxious weed species yellow and orange hawkweeds are recently established (within the last 5 to 10 years) in Montana and are rapidly expanding in established areas. They can invade undisturbed areas where native plant communities are intact. These species can persist in shaded conditions and often grow underneath shrubs making eradication very difficult. Their stoloniferous (growing at the surface or below ground) habit can create dense mats that can persist and spread to densities of 3500 plants per square mile (Thomas and Dale 1975). Are yellow and orange hawkweeds present within the project area?

11. Mitigation measures will be applied to limit weeds (see Section 3.13 in the EA).

Please address the cumulative, direct and indirect effects of the proposed project on weed introduction, spread and persistence that include how weed infestations have been and will be influenced by road construction.

Noxious weeds are not eradicated with single herbicide treatments. A onetime application may kill an individual plant but dormant seeds in the ground can still sprout after herbicide treatment. Thus, herbicides must be used on consistent, repetitive schedules to be effective.

What commitment to a long-term, consistent strategy of application is being proposed for each weed infested area within the proposed action area? What long term monitoring of weed populations is proposed?

Rare Plants

- 12 { The ESA requires that the conservation of endangered and threatened species of plants as well as animals. Local native vegetation has evolved with and is adapted to the climate, soils, and natural processes such as fire, insect and disease infestations. Any management or lack of management that causes these natural processes to be altered may have impacts on native vegetation, including threatened and sensitive plants. Herbicide application – intended to eradicate invasive plants – also results in a loss of native plant diversity because herbicides kill native plants as well as invasive plants.
- What threatened, endangered, rare and sensitive plant species and habitat are located within the proposed project area? What standards will be used to protect threatened, rare, sensitive and culturally important plant species and their habitats from the management actions proposed in this project? Describe the potential direct and indirect effect of the proposed management actions on rare plants and their habitat.

Thank you for your time. Please put us on your mailing list for this project.

Sincerely,  
/s/

And on behalf of:

Michael Garrity  
Alliance for the Wild Rockies  
P.O. Box 505  
**Helena, Montana 59624**  
406-459-5936

Sara Johnson  
Native Ecosystems Council  
P.O. Box 125  
**Willow Creek, MT 59760**

And for  
Steve Kelly  
Montana Ecosystem Defense Council  
P.O. Box 4641  
Bozeman, MT 59772

12. All construction activities occur in areas of previous soil disturbance, which is not habitat for any of the listed plants.

To whom it may concern,

1 { I urge you to use diligent care in considering the request by Imperial Oil to transport enormous equipment over 350 miles of two-lane highways, to implement tar sands exploitation. The environmental and public health impacts have not been adequately addressed in the Environmental Impact Assessment. Aside from the substantial risk of highway accidents that would be highly destructive, the disruption of precious lands like the Lochsa River corridor, and of

2 { people's lives who live and work along those highways, would be huge. Most importantly, the development of the tar sands would contribute immensely to global warming over the crucial years to come. The state of Montana, the U.S., and the planet simply cannot afford this contribution to climate change.

Thank you for your attention to my concerns.  
Janet R. Allison

**ALLISON, JANET R.**

1. See response to Common Comment H1, H2, and J.
2. See response to Common Comment P.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 {
  - o Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 {
  - o Require real alternatives to be considered;
- 3 {
  - o Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 {
  - o Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Steven Allison-Bunnell  
418 Woodford Street  
Missoula, MT 49801

**ALLISON-BRUNELL, STEVEN**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

This note is from Tom Alsaker--11600 Mullan Road--Missoula Mt. 59808  
 I wish to state my strong support regarding the Kearl Module project in Montana. I have attended several meetings in the Missoula area and believe a well organized minority is using any and all tactics at their disposal to disrupt the development of the Canadian Oil Sands Project. I know those opposed to the project are recruiting comment and "coaching" as I have received e-mails requesting help in their effort. I have looked at the highways 12, 93, 200, and I-90 as to safety, emergency vehicles, environmental accusations, tourist issues, and highway infrastructure concerns. I have the fullest confidence that the Montana Dept. of Transportation will adequately oversee the project and the companies responsible for getting the job done will do so as planned. ----- I urge that the Dept.Of Transportation grant the request as quickly as possible.

Sincerely,  
 Tom Alsaker

**ALSAKER, TOM**

1. Comment noted.

As a lifelong Montana native, a hunter, fisherman, outdoorsman, hiker, kayaker, and businessman, I think this project is a disaster. There is nothing good about it for anybody but the Port of Lewiston and Imperial Oil. All the cost-benefits calculated here are window-dressing, and omit the effect on the people using the corridor and the actual long-term effects on the quality and beauty of the travel using the highway. Alberta can make its own decisions about how it should use its resources, and I don't have anything to say about that - but I do not believe in us ruining an incredible, unique wild and scenic corridor, and mucking up our other highways in order to help them do their thing. My biggest concern is the Lochsa/Lolo/ Highway 12 corridor, which is obviously going to become a massively expanded, major trucking conduit for these rigs and everything else that follows. This is the worst possible place for these rigs and this traffic. It will ruin one of the most beautiful highways I've ever driven anywhere in the US, and deeply compromise the use of all the recreation resources that so many of us enjoy. It will totally ruin the highway as a tourist route, and for all the people who travel it for business and pleasure. I fail to see why one use up in Canada should trump everything else of importance to us here. I also fail to see the logic for why a wild and scenic corridor should be ground zero for the ultimate in high impact commercial travel. The reason the corridor is useful to them is that it has not been developed, and a major reason it has not been developed is that it is designated wild and scenic. So its use in this way is a direct contradiction. We have few enough places like the Lochsa and Highway 12 corridor left, we should not sacrifice one of the best.

Doug Ammons  
 Missoula, MT

**AMMONS, DOUG**

1. See response to Common Comment J.



Dear Sirs:

**AMMONS, DOUG**

1 { I already wrote in about the plan, but I forgot to add that I would greatly appreciate an extension of the comment period to at least 90 days beyond what is currently set. I was on the Idaho site and your site a month ago, and did not see the project listed, and so could not comment. Perhaps I'm blind and stupid, and missed it or was in the wrong web page, but I surely would appreciate the extra time. The extension would allow us to read things more closely and offer better comments.

Thank you,  
 Doug Ammons  
 douga@dougammons.com  
 415 Keith Ave.  
 Missoula, MT 59801  
 No affiliation, although I am a member of American Whitewater. I've lived in Montana for 53 years.

1. See response to Common Comment F1.

1 { As an engineer, I understand the need to transport large equipment on occasion. However, when I learned about the route along several ID and MT rivers I must comment that alternative routes must be considered with less risk to Montana's important streams. I believe that inadequate consideration to routing and a rush through the EA process has occurred. While there may be some short term gain for Montana with the proposal, the long term impacts suggest little benefit to the state or even the US. The development of tar sands in Canada, marginal at best, should not be promoted by MDT. I would respectfully ask for further consideration of environmental impacts and look at alternative routes away from surface waters.

2 {

**ANDERSON, SCOTT**

Thank you  
 Scott Anderson  
 Helena, MT

1. See response to Common Comment D1 and Common Comment D2.
2. See responses to Common Comments E1 and O.

I am for the transportation of the Canadian Oil Equipment through Missoula and Montana.

**ANONYMOUS**

1 { Please do not let a few radical people effect your decision.  
 We would not have highways, Interstate Highways, or transcontinental railroads today if we listened to the fringe element. They are just louder nowadays.

1. Comment noted.

1 { I don't believe that environmental impacts of making the alterations along the proposed route in Montana can be justified given that Montanans will receive very little benefit from the project. Surely a Canadian route can be found for a Canadian project.

**ANONYMOUS**

1. Comment noted.

Dear MT Department of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Thank you, Jennifer Anthony  
 Jennifer Anthony, PE, SE - Fearless Engineers PLLC  
 201 South Fourth Street West #2 Missoula, MT 59801  
[fearlessengineers@msn.com](mailto:fearlessengineers@msn.com) (406) 721-7833  
 licensed AZ, CA, CO, ID, OR, MT, NM, SD, UT, WA & WY

**ANTHONY, JENNIFER**

Form Letter 1

1. See response to Common Comment C2.
2. See response to Common Comment D1 and response to Common Comment D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

1 { **Christine at the Missoula Public Library states that as of this date the MLP has not received a copy of the Kearl EA. This off course limits the public's ability to make comments, I'm trying to reach the University library, but as yet have not been able to get any response from anyone there who has information on whether they would have it.**

**I request extension of the Comments period so the public has a decent chance for input.**

**Darrel Armstrong**  
**537 E. Pine, #3**  
**Missoula, MT**  
**59802**  
**406 992 2174**  
**or this email address**

**ARMSTRONG, DARREL**

1. FedEx recorded the delivery of the EA to the Missoula Public Library on April 13 at 10:23 am. A follow-up call to the library indicated that the document was received and recorded on April 13 and placed in the public reading room.

**Cultural Resources Comments for the Kearl Module Transportation Project**  
**Environmental Assessment**

1 { “The responsible federal agency first must determine whether an undertaking could affect (directly or indirectly) historic properties, which by definition include prehistoric as well as historic resources. The agency must identify the appropriate SHPO, or for lands within the exterior boundaries of a reservation, the Tribal Historic Preservation Office, (if so established), to consult with during the process. The agency must also identify other interested parties with which to consult including other agencies, the public, and Indian Tribes (whether or not the project occurs on tribal lands). Both the SHPO and appropriate THPO can provide initial information on known historic properties, the probability of unidentified historic properties, tribal contacts, and

**ARMSTRONG, DARREL**

1. MDT is not a federal agency. The EA did review the historic properties in the areas of disturbance and evaluated the impacts (see Section 3.3 of the EA) and worked with SHPO and appropriate THPO (see section 4.1.1.2 and Section 4.1.2 of the EA)

other critical information at this stage.”

Montana Historic Preservation Services Directory 9

**I. THE LAW: THE LEGAL FRAMEWORK FOR HISTORIC PRESERVATION, (p 12)**

“Significant archaeological resources affected by a project should be protected and preserved. If such resources must be disturbed, mitigation measures should be undertaken.”( p. 11)

2 { The Kearl Module EA as it presently exists does rightly address these concerns, but in my opinion does so inadequately. The scope of the project being one of a major movement of extra heavy equipment in hundreds perhaps eventually thousands of loads, if Imperial Oil & Exxon/Mobil take the option of re-use of the corridor’s establishment after the initial physical alterations are already in place, on our state and federal highways impacting not only hundreds of miles of the state’s environment, parks, Scenic waterways, water quality, local communities, our economy...on both statewide and local levels, a variety of animal and plant endangered species, current emergency services, and driving conditions, goes well beyond in complexity in all those areas what a simple Environmental Assessment was ever intended to do, a full EIS is necessary, and demands greater consideration historic preservation and archaeological work if cultural resources are to be adequately addressed. Federal land managers have obligations under the National Historic Preservation Act to safeguard known historic and prehistoric sites as well as those not yet discovered underground. In addition to direct impacts, indirect, secondary, and cumulative impacts must be evaluated, and if not avoided then mitigated.

3 { MDOT has legal obligations under both federal and state law to ensure this is properly done in both the letter and spirit of the law to protect those cultural resources and the public interest. It does not seem this is happening with appropriate rigor and the Kearl Module Environmental Assessment as it presently exists for a project of this magnitude leaves much in doubt. This situation will need to be addressed eventually if the proposed action proceeds mostly likely at the expense of the Montana taxpayer or in degradation of our overall physical and heritage environmental quality. As someone with both training in cultural heritage management and considerable on the ground experience in the survey, recording of archaeological sites, there are several things in the Cultural Resources section of the EA that bother me, or not in the EA that should be. I will review them here to give MDOT a chance to correct them, but intend also to contact the Advisory Council on Historic Preservation (ACHP) for their opinion, as anyone has the right to do so....just as the NHPA accords anyone to file suit in federal court to ensure its compliance. These are important provisions for the public good in the present political atmosphere. In a public document like this, while our Governor is pushing rapid, perhaps sometimes reckless, energy development and our Congressman seeks to find ways to exempt Montana from the Federal Antiquities Act, it is all the more important that ordinary citizens as

2. See responses to Common Comments K and B.

3. MDT has evaluated the effects on historical and cultural resources and concludes there will be no adverse impacts (see Section 3.3 of the EA).

well as resource professionals can get the necessary information to have an informed judgment on whether our common resources are in fact being protected.

Kearl Module Section 3.2 defines cumulative impacts very reasonably, following Montana Code, before giving a list of past transportation projects, then states:

4 { “Since most, if not all, of construction work identified below would not occur at night when the majority of the module transportation would occur at night, there would be little to no cumulative impact.” This is a curious mixture of archaeological good sense and wishful thinking. All ground breaking activities at least MUST occur during daylight to avoid exposure of prehistoric remains by mauling them unnecessarily with heavy equipment. To due otherwise usually means destroying a site or component of one in order to find it. In the case of primary impacts, such as digging trenches to accommodate moved utility lines and trenches and especially the numerous and frequent pull out construction or widening. The latter requires actual visual survey of the land with shovel testing before any equipment is used, and if cultural deposits are found of course trained and permitted professional excavation as well as the necessary reporting of the finds to the State Historic Preservation Office. Monitoring of all groundbreaking by heavy equipment is also archaeological good practice, (as the Blackfeet THPO has indeed requested and I think the applicants have already agreed) where ever it is feasible and in the case of this project it certainly is, and if even after previous shovel testing has taken place cultural materials are found, work should stop immediately until they are properly recorded, removed and reported. While

5 { monitoring is not always required in the western states due to relieve budgets on smaller projects, it should be the practice here. The major linear slice of the project and particularly the pull outs amounts to many acres of actual ground disturbance, and at the any million dollar scale of the project certainly adds insignificantly to costs. Trained archaeologists familiar with Montana diagnostic material, and in the case of on or near tribal lands or areas previously known to be regularly used by the tribes, monitors familiar with native cultural traditional practices and culture, should be used.

The above methodology *in toto* should be routine for cultural resource work, but in practice often is not, If it is what is intended it should be specified in the EA, and is not.

6 { The document suffers needlessly from either under reporting of necessary detail or excessive editing. Any educated member of the public should be able to read what is intended at this level of detail, not just resource professionals, since we certainly are in no position to judge how well the work has been carried out until after the resource has been destroyed. This is the essence of cumulative impact. I much prefer the ‘No Action’ alternative.

Section 3.3 gives a long list of known site types that fall along the route. In the cases of particularly the forts, lithic scatters, historic dumping grounds, culturally scarred trees, buffalo jumps and uninhabited historic buildings, and all other sites not currently protected by

4. The quote is referring to all cumulative effects, not just historical or archaeological effects. Turnout construction would occur during the daytime. Most utility work will also occur during the daytime. However some utility work along Highway 93 between Lolo and I-90 will be conducted at night. These areas were already disturbed and no archaeological material likely still exists there. Ground disturbing activities associated with traffic structures will be done during the daytime. If historic or cultural materials are discovered during ground disturbing activities, construction will cease immediately and a qualified archaeologist or historian will be consulted to evaluate the significance of the artifacts. As appropriate, SHPO, THPO, and MDT will be consulted.

5. MEPA does not mandate a pedestrian archaeological survey, shovel testing or monitoring of construction areas. Pedestrian survey and site evaluation for National Register of Historic Places eligibility is required under Section 106 of the National Historic Preservation Act of 1966, As Amended. The KMTP is not considered a federal undertaking so Section 106 has not been triggered. However, a USFS approved archaeologist will monitor construction activities along the 10 Mile Plow route on USFS land.

See response below.

6 { observation, I strongly recommend placement of pullout as far as possible from the resource, and when useful fencing. Sites of this type can lose all diagnostic artifacts very quickly due to the actions of illegal collectors and the pullouts will improve access for such pothunters, and for vandalism generally. Regrettably such mitigation is appropriate as unauthorized collection and site defacement rank with careless unmonitored construction activities as prime causes of site obliteration. To state as 3.3.2.1 does that on all eighty legal sections containing 140 known and potentially addition unknowns near construction activity of this project will be unaffected unaffected by the Kearsarge Project since they are stretches the truth archaeologically, Secondary impacts and cumulative degradation are bound to occur. This is especially true in that re-survey often adds additional sites or cultural features, and rigor and methods in archaeological surveying evolve. Simple record searches may suffice for small ventures, but this project has too major an overall impact the assumption that since they are 100 feet away “These types of sites would not be disturbed because they are outside the area of any potential disturbance, and the turnout work would not change the historical setting.” defies the experience of cultural resource professionals.

7 { It invites long term looting and defacement of these sites, a walk of one hundred feet is hardly taxing for a vandal conveniently parked at your turnouts, when they are otherwise unoccupied. If I were to such a statement on even an archaeological site form and ignoring such glaring ‘potential impact’ threat when I work for the Forest Service, I likely would be sent packing, and it certainly is very out of place in an actual Environmental Assessment, as it goes in the face of reasonable archaeological practice and the Montana Antiquities Act intent, substituting language that simply ‘sounds good’ for actual cultural resource compliance.

8 { This is particularly true on lands owned by the federal government, like the whole of Interstate 90 and Federal Highways 12, 93, 89, and 287 all of which are in the route and the crossing into Canada presumably involves Interstate 15 as well. This necessitates real compliance with the Federal Highways Act (with ) provisions designed to protect heritage resources, and in passing close to sites on federal land (Lolo and Helena National Forest lands 3.3.1 and BLM and possibly BIA administered land) as I’m sure some of these sites are necessitates up to date review by the responsible federal agencies and departments. The EA document vaguely claims such contacts are being made, but gives the reader no information about what is decided, or what, if any, concerns are being addressed. An EIS would insure adequate compliance to both NHPA 4 (f) and NHPA and other federal legislation. It is of course up to the MDOT and Montana SHPO to enforce the Montana Antiquities Act, and all others relevant state statutes like the burials laws. If human remains of some apparent antiquity are found, the local coroner as required by law alone might be enough for narrow reading of the law, but simultaneous calls to the State Forensic lab or University of Montana forensic archaeologists, AND the nearby tribes would likely be appropriate, so that both NAGPRA provisions for Native claims might be dealt with and a proper scientific investigation conducted to determine, if such human remains were in fact Native

6. Section 3.3.2.1 Turnout Construction and Road Modifications addresses the impacts from the turnout work on historical resources, indicating that work on existing turnout will not affect historical resources and that sites within 100 feet of ground disturbing activities were evaluated individually. Turnout work occurs in areas of previous disturbance.
7. The EA does not disclose information on which turnouts are located within 100 feet of a known site. A 100 foot buffer is commonly used to protect cultural resources from construction activities. Long-term looting and defacement is not anticipated.
8. Ground disturbing activities would occur in areas that have previous disturbance. There are no federal funds involved in the project.

People, possible tribal affiliation, burial data collection, and so on. The later requires both physical and archaeological expertise...and since much ethnic determination these days relies on genetic evaluation it might be best if the coroner took responsibility of securing the site, but didn't actually touch them at all. Proper methods of dealing with burials over fifty years old usually fall far beyond the training of county coroners, while more recent ones may involve a prosecutable crime or missing person, but require very different evidential procedures.

9 { I understand the Nez Perce generally oppose the Project and may be hard to work with as a result, which as it affects another state is outside this EA perview, which wouldn't necessarily be the case with a full EIS, but the Flathead tribes and Blackfeet Nation, along with their historic tribal allies, who often shared the land with them should be kept fully informed, and the Hellgate Canyon area being an area which the groups frequently came into deadly conflict may still contain burials that could be effected if work is required to modify the Interstate. I'm left a little confused that the DOT or applicants contacted the University of Montana for site records, but neglected to give the University of Montana a copy of the EA as the University is of course one of the places, where the people of Montana have the greatest level of expertise on environmental, social, economic, and cultural impacts. It almost appears, especially with the scarcity of hardcopies of the document in Missoula that MDOT and the applicants were trying to frustrate those they felt might want to comment on the EA in the best educated and most populous area the project passes through.

10 { If the previous damages to sites 24TT260, 24PW380, 24LC1191, and even 24TT556 are indeed as great as given in the report were determined by only a file search, it is likely that the measures suggested are adequate, but the sites should still be visited on the ground by professional archaeologists to see if further protection is necessary, if this has not already been done and with the understanding that if surface artifacts do still in fact exist they should be surface collected scientifically as soon as possible rather than left for unauthorized removal, and the sites should be test excavated (shovel test or formal test units), if they haven't already had this treatment to determine if there are subsurface components at the discretion of the archaeologists. While the change of plans on 24MO282 (lithic scatter) by the utility probably is adequate, fencing should be considered. The boring should be moved if possible farther from historic site 24LC235, and determination that 24LC235 and 24 LC1210 will be unaffected even though additional work is being done next to them and they are from the description in easily trafficked areas, it would be to their greater long term good if they, too were fenced off outside of their known surface peripheries.

9. No ground disturbing activities would occur in Hellgate Canyon and the interstate would not be modified there. The EA was available on the internet and several people from the University of Montana commented on it.

10. The review of the impacts on cultural sites determined there would be no additional effects on these sites, therefore, there was no need to revisit them. Additional protection is not necessary.

11 { The avoidance of sites 24 LC1089 and 24LC1211 entirely is good, but the National Historic Landmark Lolo Trail/Nez Perce Trail is a very valuable major site, but due to the missing portions a challenge to all who try to protect it. The National Historic Landmark status should mean review by NPS might be a good idea for those portions not actually on the Forests, and Fort Fizzle area impacts should be thoroughly examined as well as the Travellers' Rest. Missoula County Historic Preservation Officer Philip Maechling should be consulted on how to do the Bonner tree thinning if he feels it is a good thinning to do at all, if he hasn't already been consulted, it lies in his landscape area of expertise as well as in his territory. Philip also works in conjunction with the City of Missoula's Historic Preservation Commission; if they haven't already been included in the process they should be consulted. The Historical Preservation Commission is approved by the National Park Service community preservation program and a recognized part of the NHPA process. Missoula has formulated its own historic preservation ordinances, and some may be applicable here. In addition to immediate impacts to all these areas, long term cumulative effects due to increased foot traffic, and increased vehicle access long after the proposed end of the project should always be considered as should the prospect that of Imperial-Exxon/Mobil or others re-applying for a future use of the same corridor and continuing impact to sites and historic districts long into the future. Our street system can not accommodate hundreds or thousands of heavy equipment. Life costing accidents and serious delays of emergency services, especially around the hospital at Fort Missoula are inevitable. Fort Missoula is a very mixed case of crossed private, state, and private ownership and is a historic district of several aspects beyond being a military fort and prison, eg it served as a POW/ Japanese-American Internment Camp during WWII. It deserves an EA all it's own...and unknown and underground cultural resources from the different periods may well extend as far as Reserve Street.

12 {

13 { For any number of reasons both professional and as a general citizen, I hope for the never accepted EA option of No Action, or that at least a full EIS to help control the damage is done. Imperial Oil and Exxon/Mobil do emphatically NOT have good safety records generally and the fact that this project feeds the exploitation of the oil sands development in Alberta, where notoriously lax enforcement of environmental and safety laws is predominant in the rush to produce profits for oil companies despite the fact that increased oil dependency is the last thing we need is very relevant to Montana's understanding of the larger situation. Many Chippewa Cree people have already died from the water pollution generated by tar sands exploitation as have several pipeline welders and emergency workers in the Dakotas from unsuitable thin wall pipelines pushed by the industry to keep the costs low. Protest groups have mobilized as far away as Ireland and London to the mad pace and greed that drive this inappropriate black gold rush, while Montanans generally are still ignorant of the context of the project, even though one track of the pipeline is being developed in eastern Montana creating unacceptable risks for Montana

- 11. MEPA does not mandate consultation with Certified Local Governments but Philip Maechling and the Missoula County Historic Preservation Office may comment on the EA. No "tree thinning" will occur. See corrections and clarifications in Section 4.5 of the Decision Document regarding consultation with National Trail Coordinators. See response to Specific Comment D and Common Comment N.
- 12. See response to Common Comment H3. There would be no effects on Fort Missoula from the construction work or the module hauling. No KMTP activities would occur on the Fort Missoula grounds.
- 13. See responses to Common Comments B, E1, H1, H2, and H3.

pipe workers and a potential for loss of their lives as well as the potential for an ecological disaster in the eastern part of the state that could dwarf the ongoing BP drilling catastrophe in the gulf and the infamous Exxon Valdez destruction of Arctic coast and waters in Alaska. We are expected to believe the monster trucks moving through western Montana will abide by all applicable environmental, cultural and safety laws even while these same companies have not done so elsewhere.

14 { We are told our economy will benefit to the tune of a few million dollars, a tiny amount compared to our state budget, even though the if successful the oil companies expect hundreds of billions of profit off the oil...but tar sands technology and the instability of oil prices are undependable and could just as easily go bust, doing much damage to western plains business and the US as a whole as well as Canada.

We can only hope that the bulk of the workers employed for this project the out of area specially trained truck drivers, who won't contribute much to our economy, are US citizens, who can read Montana road signs and understand the Highway Patrol as they drive down our passes in deep winter. If they are from South Korea like the equipment or part of the Chinese work gangs that actually do much of the work in Alberta's oil sands, this may not be the case. Has the Montana DMV been consulted on driver requirements?

That, too, belongs in a proper EIS.

Sincerely,

Darrel Armstrong

[citizen of Missoula & Montana

former employee of around 11 national forests & parks (usually Cultural Resource Management)

...and former professional representative (archaeologist) with the City of Missoula Historic Preservation Commission]

537 East Pine, #3

Missoula, MT 59802

(406) 992 2174

14. See response to Common Comment Q.



1 { I do not believe you have accounted for all the costs associated with this project. There was a very good letter to the editor May 6, 2010 in the Missoulian outlining some of the things you missed. In addition what about all the costs residents of Montana will incur from waiting for these loads especially when one slides off the ice road and it takes hours or days to remove it from the river. I addition KMTP should not be “reimbursing” MDT for snow plowing sanding etc. They should be reimbursing and paying extra.

2 { KMTP should also be paying all the volunteer fire departments along this route for the services they will provide for the accidents that this project will cause. Finally I have read that each load will cost the KMTP about \$1600 in permits and fees. That is not nearly enough. It should be costing them about \$20,000 per load. If we the tax payers of Montana are going to have to deal with the delays and effects caused by such a project we should be compensated for it. Otherwise let the KMTP move their equipment along some other route or better yet hire people to build it in place. If Exxon wants to out source all the good jobs associated with the tar sands project at least we should be charging them all the true costs for moving this equipment through our state. Otherwise we are just a door mat for Exxon.

3 {

Matt Arno  
 PO Box 956  
 Potomac, MT 59823  
 (406) 244-5858

**ARNO, MATT**

1. See response to Common Comment G , H1, H2 and L.
2. See response to Common Comment L.
3. There is no indication that the oversized loads would cause additional accidents. MDT has not seen an increase in accidents related to other oversized loads permitted in the past.

1 { I am writing to say that I oppose the routing of ExxonMobile’s oversized equipment on Highway 12 from the Port of Lewiston up to Canada. I grew up in Lewiston, Idaho. I’ve long known that Highway 12 is winding and dangerous. This huge oversized equipment does not belong on these roads. I am opposed to the widening of these roads for this purpose, as this is a Wild and Scenic River area. ExxonMobil was allowed to do its own environmental analysis. They only did a cursory analysis of other routes. ExxonMobil is having the equipment made in S. Korea instead of Canada to save money, and then we carry the impacts of that decision. Why are we (America) letting Exxon Mobile jeopardize our National Wild and Scenic River corridor so they can save money – money we the taxpayers will most likely be subsidizing? (Idaho is seeking \$11 million from the feds to upgrade the Port of Lewiston to make this project and future ones like it possible. Thank you for your attention, Jean Arnold

**ARNOLD, JEAN**

1. See response to Common Comment J.

April 17, 2010

To whom it may concern,

Thank you for allowing me to comment on Exxon's tragic proposal.

Please include an alternative in your EA where Exxon dismantles their equipment in Lewiston Idaho so that it can be hauled on a truck that will negotiate HWY 12 with no road work required. A company that made 45 billion dollars in profit in 2008 the can surely afford to dismantle their equipment. This will also provide many more than 4 jobs in Lewiston.

Exxon's objectives will be met and the scenic highway in Montana will not be touched.

Montana is too great to trash for corporate profit.

If Exxon refuses to dismantle their equipment, and insists on rebuilding the road east from Lolo pass, please do not approve Exxon's proposal.

Sincerely,  
Dick Artley  
415 NE 2nd  
Grangeville, Idaho 83530  
dart\_55@q.com

**ARTLEY, DICK**

1. See response to Common Comment D3.
2. Comment noted.

**AUSTIN, DARIN**

My name is Darin Austin Residing at 816 Kern st. Missoula MT 59801; As a citizen of Missoula, Montana, I have several concerns. First: The limited time period of public comment and the short lead time to the implementation of the project.

Second: The long term impacts of creating a permanent "High and Wide Load Corridor" through national Scenic and Historic River areas.

Third: The potential for disruption of civil life and city state and public and private property. and

Fourth: Wildlife impacts.

My First comment is that it seems like a very narrow window to comment and the project slated to begin in fall of 2010 presents it like a forgone conclusion. I feel there should be more education of the public and greater participation of the citizens of Montana.

Second: Once this corridor is constructed with turnouts, road widening, MOVING OF UTILITIES; it seems to me that it will establish a permanant corridor that will infact encourage a high

1. See response to Common Comment F1.
2. See response to Common Comment K.
3. See response to Common Comment G.
4. See response to Common Comment I.
5. See response to Common Comment F1.
6. See response to Common Comment K.

volume of over over loads for the next 50 years. I do not feel this issue has been addressed.

7 { Third issue: out of state and or country hauling companies have no ties to the local area and I would almost promise that there will be broken curbs, driveways, mailboxes and other structures that cannot be forseen.

8 { Finally the Fourth issue: Wildlife has already been forced to use the night time as one of the only safe times to travel and will be stressed by over dimensional loads moving through their habitat. Please extend the comment and public education period so that the citizens ca make an informed decision. I would like to state for the record that I am opposed to this project and believe that creating a over dimensional route going through the Locksa and the Blackfoot River corridors and through the Rocky Mountain Front is a BAD idea. Thank you.

7. See response to Common Comment G.

8. See response to Common Comment I.

DON BACHMAN

3910 Sourdough Road  
Bozeman, Montana 59715  
avalpro@theglobal.net

**BACHMAN, DON**

April 27, 2010  
mdtcommentskearl@mdt.gov

VIA EMAIL:

Dwane Kaily, P.E.  
Chief Engineer, MDT  
PO Box 201001  
Helena, MT 59620-1001

Re: Kearl Module Transport Project EA

Dear Mr. Kailey:

The following are my comments on the above referenced Environmental Assessment:

**The EA does not thoroughly explore alternative routes.**

The EA accepts the proponent’s dismissal of the Canadian port of Prince Rupert due to bridge height restrictions on the Yellowhead highway 35 miles east of the port. It’s been a long time since I’ve traveled that route, but it seems that the potential of constructing a new bridge detour (temporary or permanent) should be displayed for consideration. The alternative of the Kitimat aluminum smelter off-load port to the south, which accesses the Yellowhead Highway (CA 16) east of the subject bridge via BC 37, should also be examined.

1. Imperial Oil did consider this route, however, there are four truss bridges where no detours are available.

<p>2 {</p> <p>3 {</p> <p>4 {</p>	<p>The alternative of CA 1 from the Port of Vancouver should be explored by passing the Hope overpass constraint with a detour so as to access the Crownsnest Highway, which accesses industrial sites such as the Trail Smelter and coal mines in the vicinity of Sparwood – thus accommodating oversize loads in the past (though I don’t know those haul load dimensions). This highway continues east into Alberta and I don’t believe there are insurmountable height/width constraints on through to Fort McLeod and the already planned route to Fort McMurray.</p> <p>The last alternative to be examined in the EA documentation, is to utilize the Port of New Orleans to barge the loads north to St. Paul vicinity and on to Fort McMurray through mostly the Canadian highway system. While this alternative may seem infeasible and unreasonable, the global nature of this project is of a scale which would indicate the potential for this delivery route.</p> <p><b>The purpose and need of this project is not sufficiently in the public interest to warrant issuing this permit:</b></p> <p>The development of Canadian Oil/Tar Sands petroleum resources is not in the interest of the US and could not be permitted under Federal and State laws and regulations. Thus, enabling a project which causes harm and compromises environmental and societal standards that are well established in the United States should not be considered by the State of Montana.</p> <p>(s) Don Bachman</p>	<p>2. The Hope overpass is the first of numerous restrictions that create impediments to using a route through Canada, as explained in the EA on page 14. See response to Common Comment D1</p> <p>3. See response to Common Comment D.</p> <p>4. See response to Common Comment E1.</p>
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Thank you for the opportunity to comment on this project.

I am deeply concerned about the environmental impact this project will have on our region for a variety of reasons.

- |                                  |   |
|----------------------------------|---|
| <p>1 {</p> <p>2 {</p> <p>3 {</p> | <ol style="list-style-type: none"> <li>1. The improvements required to allow these behemoths to travel from the border to the Sweetgrass area are huge in number and will benefit the equipment haulers almost exclusively. In other words, our state will accept the blight of these improvement for many years to accommodate this specific traffic.</li> <li>2. The use of the turnouts will go until the end of the specific project. At that point, the turnouts will simply sit there and deteriorate over time. Will they be reclaimed or left there? When, due to lack of on-going maintenance, one or more of the turnouts undergoes a structural failure, who will pay to fix it or remediate the damage done?</li> <li>3. On the other hand, if the establishment of this route becomes something that is then used in perpetuity by other haulers, Montanans ought to know. There ought to be some way of financing the maintenance of the turnouts if they are to continue to be used and it should not come at the expense of Montana taxpayers.</li> </ol> |
|----------------------------------|---|

**BADENOCH, GEOFF**

1. Comment noted.
2. See response to Common Comment L.
3. See response to Common Comment L.

- 4 { 4. These rigs will be very frustrating to confront in traffic. On coming traffic may not be able to go around them and be forced to pull off to let them pass. Coming up behind one will likewise be a frustrating experience. Drivers will have an incentive to pass or act otherwise unsafely to minimize the conflict. 5 miles per hour. Seriously???
- 5 { 5. What happens if one of these rigs gets a flat tire between pullouts? Or has a mechanical breakdown? No ordinary tow truck could move it. At that point, the blockage to the highway would become an ongoing problem for all motorists.
- 6 { 6. What happens if one of these rigs runs off the road and gets dumped in one of the rivers? How does it get out? If it happens in the Blackfoot, huge sections of fishing and rafting and other recreation might be affected.
- 7 { 7. I am not convinced that Montana winters, especially in the passes, have been seriously factored in to the planning of this enterprise.

- 4. See response to Common Comment G.
- 5. See response to Common Comment G.
- 6. See response to Common Comment H2.
- 7. See the MTP.

In short, I am highly skeptical of this whole enterprise. It would be preferable to not off-shore the construction work to Korea and build the drilling rigs in Canada. There are better alternatives than driving them through Montana.

Geoff Badenoch  
 336 South Fifth Street East  
 Missoula, MT 59801  
 406-728-7321

Dear Sir, Ma'am,

I would like to voice my opinion on the matter before MDT concerning the transportation of materials through Montana. I would like to voice my support for allowing these transports through the state.

- 1 { At a time when oil demand is high and the production of oil brings many jobs, I feel it is vital that such projects be undertaken. I do not agree with some who feel this will harm our scenic Montana. Oh the contrary it will bring much needed money and jobs into the state at a time of high unemployment.

Thank you for hearing my opinion,

Michael F. Badgley Jr  
 82 Ulm S Frontage Rd  
 Ulm, Montana  
 59485  
 406-866-2065

**BADGLEY JR., MICHAEL**

- 1. Commented noted.

Dear Ms. Or Mr.,

1 { I am writing to respectfully request that the Montana Dept. of Transportation require a full EIS before we issue a permit to transport permit for the massive mining equipment en route to Canada.

2 { As a native Montanan and a frequent user of our roads and highways, I foresee huge safety concerns and potential road wear issues with these transports.

{ I also have deep concerns about the ultimate use for this equipment, which is destined to help extract tar sands in Canada.

{ It seems that we are only responsible for our limited exposure to policy issues, and our livelihoods have little to do with "someone else's problems". The miners aren't making the decision to utilize the destructive tar sands, they are just collecting a paycheck doing hard work.

3 { The executives of Imperial Oil aren't out there creating a problem, they are just providing energy serving shareholders. And Montana? We're just letting these huge vehicles haul 200 convoys of oversize equipment. If you look at it this way, no one is responsible; there's no such thing as an important cross-sector issue. We all just merrily go about our own business until the redundancies that Mother Nature provided ultimately give way. That way, we can tell our kids and grandkids: it's not our fault.

4 { Please force Imperial Oil to go through the EIS permitting process. Force them to justify this link in the fossil-fuel supply chain.

Thank you.

Claire Baiz

1103 4<sup>th</sup> Avenue North

Great Falls MT 59401

Vicki Baker, Bynum, MT

**BAIZ, CLAIRE**

- 1. See response to Common Comment B.
- 2. See responses to Common Comments H1, H2, H3, and L.
- 3. See response to Common Comment E1.
- 4. See response to Common Comment B.

**BAKER, VICKI**

1 { I am in favor of the project. Anything that we can do to add to our economy in this state is a benefit. These people will be renting hotel rooms, buying fuel, gas and food. At this point even a little bit will help.

- 1. Comment noted.

1 I absolutely oppose the plan to transport oil extraction equipment over Highway 12. This highway, especially between Lewiston and Lolo, is unique in the lower 48. I am not aware of any other stretch of highway where one can drive so far through such incredibly beautiful country with so little development. Besides disrupting travel for tens of thousands of people, the plan will require extensive highway modification and tree removal. Roads like this have become virtual museum pieces. If Exxon and the Canadian government are so intent on developing the Alberta oil fields, let the Canucks provide the roads and let Exxon pay to rebuild the overpasses they will have to tear down. Better yet, ship the stuff around the horn and haul it north through Texas!

Rob Balch  
520 Hartman  
Missoula, MT  
59802

**BALCH, ROBERT**

1. See responses to Common Comments E2 and J.

Name: Bill Ballinger  
Address Line 1: 177 Briarwood  
City: Helena  
State/Province: MT  
Postal Code: 59601  
Phone Number: 406-461-9008

1 { We need to slow up and properly assess the LONG TERM impacts of allowing Oil Companies to use Montana Highways, specifically along the Blackfoot River, as their commercial main transportation routes for oil.

**BALLINGER, BILL**

1. Comment noted.

1 { I would like to comment on the transport of the Canadian Modules. I support this program folks find all kinds of reasons to oppose everything that comes along. They fight at every turn when folks are just trying to conduct business. This project would not only benefit folks in the long term but these trucks and lead cars all have to buy fuel and lodging in Mt. that helps local folks. Most folks might take notice if they took time to look at the big picture. They should take time and effort to address real problems like cell phone usage in the vehicle.

John Barker  
291 S. Tudor St.  
Victor, Mt. 59875

I drive every day to Missoula I see far more scary things on the road than nodules.

**BARKER, JOHN**

1. Comment noted.

Rick Bass

2800 Maurice Ave.  
Missoula, MT 59801

**BASS, RICK**

<<mailto:bass@lclink.com>>bass@lclink.com

May 4, 2010

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

Dear MDOT:

1 { It is my belief that your agency is being negligent in hurrying the permitting process for the proposed Kearsarge Transportation Module Project. I am strongly opposed to this foolish development that will create a major industrial transportation corridor through Montana's (and the nation's) scenic byways, ruining Montana's tourist industry.

1. See response to Common Comments K and M.

2 { We have already seen what foolish state decisions in Arizona and Alaska (on national matters) can do to those states' economies. The only thing more ludicrous than the idea is of transporting such machinery along the Lewis and Clark National Scenic Byway is the idea of trying to keep such transport on the lovely, lonely winding roads of Highway 89 north of Choteau. Don't be penny wise and pound foolish. And again, in attempting to hurry this process through in a mere 30-day window, you are being negligent, rather than seeking to examine with the full caution and care and breadth of comment an issue of this magnitude deserves.

2. See responses to Common Comments F1 and J.

Sincerely,  
Rick Bass

Rick Bass

**BASS, RICK**

2800 Maurice Ave.  
Missoula, MT 59801

<<mailto:bass@lclink.com>>bass@lclink.com

May 13, 2010

Ladies and Gentlemen:

I have more questions about the Kearsarge proposed unit, which seeks to destroy the character and quality of the state of Montana, and make a laughingstock of the office of the governor, with its claim that only 200 loads will be transported once the infrastructure is completed. The governor states it's a one-time transport even as he states his desire for Montana to become an energy corridor. This is not honest politics and casts a shadow on every subsequent utterance or



“study,” whether conducted by Imperial Oil or, in the future, the state.

I have some more questions:

1 { How will this affect the wildlife corridor from the Rocky Mountain Front to the grasslands?  
 Who will assume the full legal costs involved with this decision? Will the clean-up of Lolo Pass, the Blackfoot, the Clark Fork, the Dearborn, and other watersheds that will be affected by this transport, be passed on to the state of Montana if the project were to proceed?

2 { What will be the impact in dollars on the tourism industry in Montana?  
 Is the state of Montana for \$68 million or for any price?--willing to circumvent the will of the people and take away a state the future will never know?

3 { What, if anything yet, has been Imperial’s, or that of any subsidiary within Imperial, political contributions to elected officials involved in any way with this proposed corridor, and what means and process of transparency exist to watch for and monitor such contributions in the future?

Sincerely,  
Rick Bass

1. See response to Common Comment I and Common Comment O.

2. See response to Common Comment M.

3. Montana’s Office of Political Practices maintains information on contributions to elected officials.

1 { Why did MDOT and Imperial decide on only a 30 day comment period for such a major national (and transboundary/international) issue?

Sincerely,  
Rick Bass  
2800 Maurice Ave  
Missoula, MT 59801

**BASS, RICK**

1. See response to Common Comment F1.

1 { I must object in the most strenuous terms to the Kearn Module Transport Project (KMTP). We don't need to have these heavy trucks traveling through Montana destroying roads and endangering the lives, health, and welfare of Montanans just to support the development of one of the most environmentally destructive means of producing oil in a foreign country. Please consider ALL of the environmental impacts of this project, not just the impacts in Montana, but ALL of the destructive cumulative environmental impacts of the entire projects. And keep these huge trucks off our roads!

**BATEMAN, GUY**

1. See responses to Common Comments L, G, and E1.

1 We have always been alarmed about the Kearn Module Transportation Project, and after reading Steve Seninger's critic of the economic analysis used in MDT's environmental assessment process, we are strongly opposed! Surely we citizens deserve a comprehensive review that **thoroughly** outlines the social, economic and environmental impacts. As we witness the devastating oil spill in the Gulf Coast, we are well aware that projects associated with the oil industry, fueled by tremendous amounts of money, are often fraught with unforeseen consequences, accidents, and damage to the environment. We are very suspicious.

Thank you.  
 Donald and Rebecca Bauder  
 9236 MT Hwy 35  
 Bigfork, MT 59911  
 406 837-2142

**BAUDER, DONALD AND REBECCA**

1. See the responses to Common Comments M, H1, H2, and H3.

1 Hi, my name is Lindsay and I want to thank MDT for providing this opportunity for public comment. As someone concerned about the significant impacts of this project on sensitive riparian areas, on road and bridge infrastructure, on our recreation and tourism industries, and on the communities along the proposed route, I call on MDT to conduct a full EIS on this project - anything less is unacceptable. The current EA is woefully  
 2 inadequate: we must take all economic costs into consideration, and the current list of  
 3 alternatives is artificially constrained. In addition, in light of the short period during which the public has had a chance to participate, I hope you will extend the comment period to 90 days to allow for full and effective public participation.

Thank you,  
 Lindsay Becker  
 836 S 4th Street W  
 Missoula, MT 59801  
 (406)214-9462

**BECKER, LINDSAY**

1. See response to Common Comment B.
2. See response to Common Comments D1, D2, D3, and M.
3. See response to Common Comment F1.

Dear Sirs/Ms:

1 In light of the environmental impacts, especially climate change issues, we see no reason for the State of Montana to grant a transportation permit to Exxon Oil's subsidiary to haul 200 loads of tar sands drilling equipment. This enormous equipment presents a clear danger on Montana's two-lane highways; citizens do not deserve this risk for the economic benefit of a private enterprise that has already damaged the environment and taken twenty years to begin to make reparation for its destruction in Alaska.

**BECKER, MIKE AND STEPHANIE**

1. See response to Common Comment G, H1, H2, H3, M and P

We urge the DOT to consider the risk and deny the permit. Thank you for your attention.

Sincerely,

Mike and Stephanie Becker  
 P.O. Box 268  
 Harrison, MT 59735

<p>1 { Please do not allow the big rigs to plug Montana`s roads.                  Bill Beede                  Townsend Mt.</p>	<p><b>BEEDE, BILL</b>                   1. Comment noted.</p>
<p>Comment Regarding the Kearn Module Transport Project (KMTP)</p> <p>Although I made a public statement at the Missoula hearing on April 29, 2010 in Missoula, I feel it is imperative that I clarify my statements and add a new comment.</p> <p>1 { 1. Emergency medical access must be preserved between Lolo Canyon and Missoula as well as in the Blackfoot River Corridor. Both canyon areas have only intermittent cell phone access, so when there is a medical emergency folks have a tendency to head for the nearest hospital. Sometimes, they call in. Sometimes, they do not. The corridor between Lolo and Missoula can easily be mitigated by turning the south bound lane into a two-way road during the period that the modules are being transported. What are the guarantees that medical emergencies being transported in private vehicles will have access around the modules on Highway 12 and on Highway 200?</p> <p>2 { 2. Downdrafts are a certain reality in Lolo Canyon. They cannot be predicted although the conditions that surround them can. If a downdraft can take down millions of board feet of timber in a matter of minutes, I can imagine what it can do to one of the rigs.</p> <p>3 { In addition to the downdrafts, Lolo Canyon can also have high unpredictable winds. What type of mitigation is planned for such occurrences? At the hearing, it was stated that high winds could cause a crash or failure on the transport module, yet Imperial Oil spokespersons felt that there was no need for emergency equipment to be in place for such an accident. <i>Never</i> is not an acceptable word to use when discussing human endeavors, especially when discussing possible mechanical failures.</p> <p>3 { 3. From September through May, icy roads and icy spots are another common occurrence on Highway 12 and Highway 200. Will there be emergency clean-up equipment available?</p> <p>4 { 4. I am also concerned about the pullouts on Highway 12 and on Highway 200. How many have to be widened? How will this impact Lolo Creek? The Blackfoot?</p>	<p><b>BELANGIE-NYE, JEAN</b></p> <p>1. See response to Common Comment H3.</p> <p>2. Comment noted.</p> <p>3. See responses to Common Comments H1, H2, and H3. Module transportation would not occur during inclement weather.</p> <p>4. See response to Common Comment O.</p>

5 { 5. It has been brought to my attention that the traffic control light at Glacier and Highway 93 in Lolo is to be replaced because it has to be in sync with the new traffic control light that is being installed at Tyler and Highway 93. It has also been pointed out that the lights will swivel away from the center line to allow for the passage of the Kearsarge Module. I know that the Tyler traffic control light has been listed for replacement for several years. However, the Glacier traffic control light has never been mentioned. Therefore, are we the taxpayers of Montana being asked to replace the Glacier traffic control light when in reality it is being replaced so the Kearsarge Transport Module can proceed through the corridor? Is the price of the Glacier traffic control light included in the Kearsarge budget?

6 { In addition, is the traffic control light at Highway 93 and 12 being replaced or adapted and is that light included in the Kearsarge budget and not the Federal or Montana highway budgets?

7 { Finally, why was an EIS not conducted?  
Submitted by, Jean Belangie-Nye, 321 O'Connell Drive, Lolo, Montana 59847

5. See response to Common Comment L.

6. All traffic structure modifications would be done at Imperial Oil's expense.

7. See response to Common Comment B.

1 { As a lifelong Montanan I do not wish to join the victims of Louisiana, Alabama, Mississippi and Florida in the environmental destruction inflicted upon them by "big oil" in its insatiable appetite for unlimited profits regardless of the unnecessary risk to the life of the planet. The Alberta Tar Sands project exemplifies this risk and will make no contribution whatever to the economy or general welfare of Montana. On the contrary, it will not only do substantial damage to our natural resources but it will probably impose huge damage on the rest of the world. Our beloved state should not be aiding or abetting this ill-conceived project by allowing the Valdez catastrophe folks to clutter up this state with useless highway construction that we will have to live with long after they gorge themselves with billions gained in part by our generosity. Let them wreck B. C., Alberta and the rest of the world if they must but not Montana. Do your duty. Protect us as best you can. Gordon Bennett. 1202 Stuart Helena

**BENNETT, GORDON**

1. Comment noted.

Comment or Question:

My name is Erik Berry, I grew up in Missoula and currently go to the University of Montana studying Business and Environmental Studies. My education has shown me that ignorance was bliss, but after my eyes have been opened to the environmental destruction taking place around the globe- I am hopeful to know that people still care.

The devastation that tar sand mining produces is no secret- and neither is the profitability of Exxon. In 2007 Exxon's profits were over 40 billion dollars. In 2008 Exxon's profits were over 45 billion dollars. And in 2009 Exxon's profits were over 19 billion dollars. That comes to over 115 billion dollars in profits in the last three years. As Montana farmers were going out of business because they couldn't afford to put gas in their trucks, Exxon was thinking of ways to make even more money off of them. Many of my fellow students were unable to travel home for Thanksgiving and Christmas to see their families because they had to choose between buying gas or buying food- all while Exxon was investing millions in the Canadian tar sand mining operations. People in Montana and Canada want clean, efficient, and reliable energy- people do not want to see the rainbow and cutthroat trout die off, the water-table to drop or their favorite hunting spot to be devoured by tar sands. Why should the citizens of Montana bend over backwards so Exxon can cause even more devastation and make even more money by extracting 4 million barrels from the Canadian landscape? What will we get out of it? Will Exxon share their 115 billion dollars with the people of Montana or Canada? Can we trust Exxon to clean up their mess after they have made their money and left? I challenge anyone, including Exxon, to give good reason for use to enable this disgustingly monstrous extraction parade through our city and state. Thank You.

1

**BERRY, ERIK**

- 1. See response to Common Comment E1.

To Whom it May Concern,

Please do NOT issue a permit for oversize and heavy equipment to use Montana highways as a transport route to Alberta.

Apart from the environmental impacts of the tar sand project this equipment would serve - forest removal, increased particulates, decreased water quality, and greenhouse gas emissions - the equipment transport will disrupt communities, require otherwise unnecessary modifications of our roads and utility infrastructures, and will damage roadways.

1

Furthermore, once such a route is established, it will likely become a preferred route for all kinds of stuff we don't necessarily want being moved through Montana. If we don't say no to the first such use, it will be difficult to justify denying future requests.

2

**BIRCK, KIM**

- 1. See response to Common Comment E1, G, and L.
- 2. See response to Common Comment K.

Please consider all the impacts, and reject the permit application from Imperial Oil.

Thank you,  
 Kim Birck  
 9280 Keegan Trail  
 Missoula, MT 59808  
[kbirck@aol.com](mailto:kbirck@aol.com)

**BISHOP, JOAN AND DON**

1 { To Tom Martin, Please prepare a full environmental impact statement before you issue a permit to transport so much large equipment across Montana. Thank you. Joan & Don Bishop, Helena Mt.

1. See response to Common Comment B.

**BJORKLUND, HAROLD**

To Whom It May Concern:

1 { NO big rigs should be allowed to travel from Korea, down the Columbia, through Idaho's beautiful mountainous valleys, over Lolo Pass, down Lolo Creek Road (Hwy 12) and into Canada's tar sands. We watched the "dry run" of the first big rig and the parade of highway vehicles, flag men, power company personnel, etc. was astounding and so unnecessary. Not to mention the trees that were chopped down last fall awaiting this unnecessary spectacle. And for a measly several million in the state coffers. Brian Schweitzer should be ashamed at claiming this charade will provide thousands of jobs - perhaps in Korea, but not here.

1. Any previous loads transported on the route were not associated with the KMTP. No trees have been removed or will be removed in Montana for the KMTP.

FIND ANOTHER ROUTE - NOT ONE DAMAGING TO OUR MONTANA ENVIRONMENT.

2 { And when will the next company want to use the same route for the same purpose? Stop it now!!!! WE DON'T NEED IT.

2. See response to Common Comment K.

Signed,  
 The Bjorklund's  
 14245 Lolo Creek Road  
 Lolo, Montana 59847

<p>Montana Department of Transportation,</p> <p>1 { I support an extension of the public comment period on the Kearn Module Transportation Project. I have concerns about the impact of this massive equipment on our roadways and bridges. Can our infrastructure withstand these loads? Are the companies involved going to pay to fix our infrastructure if they damage it? I think our public officials making this decision should know that they will be held accountable if this thing turns out to be a bad deal for Montanans. Thank you, Graham Black 741 Taylor St. Missoula 59802</p>	<p><b>BLACK, GRAHAM</b></p> <p>1. See responses to Common Comments F1 and L.</p>
<p>1 { I think this is outrageous to think that this is a good idea. If this goes through there is a high potential for environmental damage, I would like to know who is hiring and paying for the engineer to inspect the roads I think that an outside source like a 3rd party should be finding and paying for the inspection. Furthermore the environmental impact statements are very incomplete and biased. I am strongly against this and think that the whole situation has been overlooked and tried to be kept quiet.</p>	<p><b>BLACK, JAMES</b></p> <p>1. See responses to Common Comments M and L.</p>
<p>1 { Please stop this nonsense of the Kearn Module Transport Project. Let them take the units by barge to Canada and across Canadian highways. After all it is Canada and Canada Exxon making all the money off the oil sands. Why should we assist in their profiteering and the exploitation of the world's environment?</p> <p>2 { Let their citizens be inconvenienced by the disruption in traffic and the potential hazards and the repairs to the highway system.</p> <p>3 { Why should Montana be left with the aftermath of fixing the roads that will be severely impacted after the weight of 100 or more loads?</p> <p>Absolutely ridiculous idea which should be put out to pasture immediately.</p> <p>Robert Blanchet Executive Vice President-Senior Credit Officer First Montana Bank 201 N. Higgins Ave. Missoula, MT 59802 406-829-2675</p>	<p><b>BLANCHET, ROBERT</b></p> <p>1. See response to Common Comment D1.</p> <p>2. See response to Common Comment G.</p> <p>3. See response to Common Comment L.</p>

Dear MDT folks,

1 { Please do a full Environmental Impact Statement on the permit to move Alberta tar sands equipment through Montana.

2 { When I first read about tar sands petroleum development, it made my hair stand on end. It is destruction on a scale that is hard to imagine. It will impact Montana by generating pollution, warming our climate, and destroying habitat used by our migrating birds.

3 { We should not disrupt our traffic in order to facilitate all this damage. Please do a full EIS that examines the cumulative impacts, so we can make a decision that takes into account the full repercussions.

Sincerely,  
 D. Blank  
 Box 953  
 Whitefish, MT 59937

**BLANK, D**

1. See response to Common Comment B.
2. See response to Common Comment E1.
3. See responses to Common Comments G and B.

Name: Erica Bloom  
 Address Line 1: 515 E. Pine St. #3  
 City: Missoula  
 State/Province: MT  
 Postal Code: 59802  
 Email Address: bloom1erica@yahoo.com

Comment or Question:

1 { Hi, my name is Erica Bloom and thanks to MDT for providing this opportunity for public comment. As someone concerned about the significant impacts of this project on sensitive riparian areas, on road and bridge infrastructure, on our recreation and tourism industries, and on the communities along the proposed route, I call on MDT to conduct a full EIS on this project - anything less is unacceptable. The current EA is

2 { woefully inadequate: we must take all economic costs into consideration, and the current list of alternatives is artificially constrained. In addition, in light of the short period during which the public has had a chance to

3 { participate, I hope you will extend the comment period to 90 days to allow for full and effective public participation.

**BLOOM, ERICA**

1. See response to Common Comment B.
2. See response to Common Comment M, D1, D2, and D3.
3. See response to Common Comment F1.



**MASSIVE MINING EQUIPMENT TO BE MOVED THROUGH MONTANA TO ALBERTA TAR SANDS**

1 { My comments on the proposed project: I am greatly concerned by the environmental impacts of this project, especially the cumulative, long-term impacts. Just how bad does it have to get before we start to “just say no” to the big oil companies???

Jenifer Blumberg  
38892 Morris Rd.  
Charlo, MT 59824

**BLUMBERG, JENIFER**

1. See Table 1 of the EA, Conclusion and Summary of Effects.

In regard to permit movement of Kearn Co Oil sands equipment over Montana highways.

I want to register my opposition to letting convoys of Kearns equipment use Montana highway.

1 { This equipent is so grossly oversized that it will undoubtly lead to damage to our roadways in additional to severe disruption of traffic in our state. The roads are for residents and tourists to use and other Montana economic interests, not some massage Canadian Boondoggle. In addition  
2 { the MDT should prepare a full environmental impact study on the transport of this equipment, effects not only on Montana, but also on the rest of our environment.

Sincerely  
David P Boggs, MD

**BOGGS, DAVID**

1. See response to Common Comment G and Common Comment L.
2. See response to Common Comment B.

Dear MT Department of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

I fear this route will be both dangerous for traveler and bad for our state’s tourism industry. This high and wide traffic will promote bad experiences for tourist visiting our lovely state. This billion dollar corporation needs to find an alternative to getting their equipment to the drilling location.

**Lindsey Bona,**  
**(406) 258-4219**

**BONA, LINDSEY**

Form Letter 1

1. See response to Common Comment C2.
2. See response to Common Comment D1 and response to Common Comment D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

Bonner Milltown Community Council  
Box 655  
Milltown MT 59851  
11 May 2010

Dwayne Kailey  
Montana Department of Transportation  
PO Box 201001  
Helena MT 59620-1001

Dear Mr. Kailey

1 { The Bonner Milltown Community Council respectfully requests an extension of the public  
comment period for the Kearsley Oil Sands process module transportation project now being  
2 { planned for Highway 12 and Highway 200 in Western Montana. We request that MDT provide  
more information about the project, including an evaluation of possible alternative routes and a  
3 { comprehensive comparison of costs and benefits to the Montana communities along the proposed  
route. Of particular concern to us is the possibility of accidents with the module transportation  
4 { vehicles, particularly likely during winter. Because of the very large size of the modules, we  
expect there would be great difficulty in dealing with accidents. We would appreciate the  
5 { opportunity of knowing about the feasibility of contingency plans for normal and emergency  
vehicular use of the highways in the event of an accident during module transportation. We are  
similarly concerned about impacts to our local economy and way of life that might be caused by  
disruption to recreational and tourist services focused on the Blackfoot River. We would like to  
know more not only about impacts of the currently planned project but also long term impacts  
should the route become a permanent "high and wide" industrial transportation corridor from the  
Port of Lewiston.

Sincerely,  
Chuck Erickson, President

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;

**BONNER MILLTOWN COMMUNITY COUNCIL, CHARLES ERICKSON**

1. See response to Common Comment F1.
2. See the response to Common Comment D1.
3. See the response to Common Comment H3.
4. See response to Common Comment M.
5. See response to Common Comment K.

**BOOKHOUT, YAICHA**

1. See response to Common Comment C2.
2. See response to Common Comment D1.

- 3 { • Thoroughly examine the impacts to the wildlife, endangered/threatened species and critical habitat in detail;
  - 4 { • Re-examine the impacts to our water resources;
  - 5 { • Extend the comment period to 60-days, ExxonMobil got two years to submit a plan Montana deserves more time to weigh the benefits and costs;
  - 6 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
  - 7 { • Come up with an extensive emergency response plan if the trucks need to be removed from the road due to a crash, rollover, tip, lose module, etc.;
  - 8 { • Include the public in the process more it is important to include us since it will impact us;
  - 8 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts
- Thank you,  
Yaicha Bookhout

726 Stephens Ave Apt A  
Missoula MT 59801  
952 836 9461

- 3. See response to Common Comment I.
- 4. See responses to Common Comments I and O.
- 5. See response to Common Comment F1.
- 6. See response to Common Comment M.
- 7. See responses to Common Comments H1 and H2.
- 8. See response to Common Comment A.

- 1 { Please consider the devastating cumulative environmental impacts of tar sands development – especially its contribution of global warming. Please don't issue the permits to transport the massive equipment across Montana.

Thank you,  
Donna S. Bowie

*Donna S. Bowie*  
*Certified Public Accountant*  
*352-377-2900*  
*352-377-5740 Fax*

**BOWIE, DONNA**

- 1. See responses to Common Comments E1 and P.

Hello,

My comments AGAINST allowing heavy hauling along Highway 12 (Lochsa River “Wild and Scenic” corridor):

First – what part of the phrase “Wild and Scenic” do you not understand?

Why is it even “possible” for you to consider altering a beautiful tourist highway for a short-term use?

The best "jobs creation" that will come of this is:

1) Unnecessary road "improvements" on an already "just improved" beautiful road.

This highway has very many and regular pull-offs all along it's length – it doesn't need more!

I am sure the widening and straightening will mean “shaving off” tight corners and cutting trees quite a bit back.

This will effectively ruin the character of this WILD AND SCENIC highway.

2) Incidental "fill-in" jobs, like flag-people and peripheral escort vehicles.

3) You know they will have to have their own support trucks for Gasoline and repairs.

The local restaurants will ultimately lose many more meals and hotel visits because of lots of tourists avoiding this highway.

Why are people so quick to jump up and down about anything that promises "Dollars", without looking long-term at the overall costs against short-term benefits.

Remember - this isn't some huge contract worth billions that is going to employ hundreds or thousands of Montanans for years to come...

It is a temporary shot of paltry dollars that comes at a cost of other significant tourist dollars and alters a road that is revered around the country as a "perfect" road as it is right now.

The way I look at it, they've made a decision to scrap their original plan of going thru the Midwest in order to save a few bucks by turning a wild and scenic highway into a temporary heavy industrial road...

It is simply not necessary.

Sincerely,  
 Greg Boyd  
 311 Knowles St  
 Missoula, MT 59801  
 406/327-9925

**BOYD, GREG**

1. See response to Common Comment J.

2. See response to Common Comment M.

Clifford Bradley  
 510 East Kent Ave.  
 Missoula MT 59801

Comments re: Kearl Module Transport Project

My comments regarding the Environmental Assessment for the Kearl Module Transport Project are in three areas.

1. The 32J permit should be denied. An environmental assessment for issuing an oversize load permit and associated permits for turnouts etc. is not the appropriate venue for an action of this scale and potential impact. The process for issuing permits for oversize loads and minor road modifications do not anticipate loads of this size or a project of this magnitude.
1. The permanent road modifications, turnouts, logistical support, modifications to the port of Lewiston Idaho and indeed statements by the Director of the Montana Department of Transportation all clearly indicate the intent to create a permanent corridor for loads of this type. A decision of this magnitude cannot be reduced to consideration of specific permits and oversize loads in Montana.
2. At a minimum this action requires a comprehensive Environmental Impact Statement of regional scope. Potential economic and environmental impacts and need for mitigation go far beyond the effects of the loads on roads and need for new turnouts in Montana. This project results in permanent modifications to federal highways, and creates a permanent “high wide corridor” with regional impacts. Hundreds of loads of unprecedented size and weight will cross state boundaries, US Forest Service land and tribal lands. Road modifications and potential accidents will affect major river systems in Idaho and Montana; rivers with pristine water quality, wildlife habitat, high value tourism and recreation, and which supply irrigation and municipal water. The EA is totally inadequate in considering the potential economic, social and environmental impact of an accident with one of these loads.
3. The Montana Department of Transportation does not have the breadth of staff expertise, nor regulatory authority to assess or mitigate the impacts of this project; the review process needs to be led by a Federal agency with the formal participation of multiple federal, tribal, state and local agencies in evaluating regional impacts impacts and mitigation.

**BRADLEY, CLIFFORD**

1. See response to Common Comment K.
2. See responses to Common Comments B, H1, H2, H3, O, I, and M.
3. See response to Common Comment A.

<p>4 { 3. <u>The consideration of a bond is totally inadequate.</u> If this project is approved Imperial Oil needs to post a bond of sufficient value to mitigate impacts of an accident or other event that might affect rivers, towns, human health and loss of income. The formulas used to assess bonds based on potential wear to pavement and bridges etc. do not begin to calculate potential damage from this action. The company should be required to post a bond of at least \$10 billion. Imperial/Exxon has the political and economic power to make it very difficult, time consuming and expensive for the State of Montana or people affected by this action to ever effectively recover mitigation for adverse impacts. In setting a bond (and indeed in even approving this project), the MT Department of Transportation should review and consider the record of Imperial/Exxon corporation in dealing with environmental and economic impacts resulting from their operations. The citizens of Alaska affected by the Exxon Valdez disaster decades ago have still not received full compensation due to Exxon’s delays, legal actions and outright disregard for legal judgments.</p> <p>5 { This action is a key element in development of the tar sands in Alberta, one of the most environmentally destructive projects of any kind on the planet with global impacts to the climate. It is absurd to consider this action as a simply issuing oversize load and minor road modification permits in Montana. We need to stop destroying the planet one permit at a time.</p> <p>Thank you for your consideration Clifford Bradley Missoula Montana</p>	<p>4. See response to Common Comment L.</p> <p>5. See responses to Common Comments E1 and P.</p>
<p>1 { Voicemail comment received by me today from Glenda Bradshaw</p> <p>I am calling to voice my concern about the Kearl Module Transport Project. Primarily I’m very concerned about the Blackfoot River corridor and the effects that the transport project would have on environmental and economic concerns within the recreation industry within that corridor. It’s also one of my favorite places to go and float and I just don’t see how that is going to be possible with all that traffic. I think the kind of road enlargement that would be required for this project would be of great concern also. I think there is the same problem that exists in the Lochsa and Lolo Pass, but I am primarily concerned with the Blackfoot.</p> <p>Glenda Bradshaw Helena, Montana</p>	<p><b>BRADSHAW, GLENDA</b></p> <p>1. See response to Common Comment O, M, G and J.</p>
<p>1 { Please, do not do this. Please do not let it happen. You know what I am talking about. -Julia</p>	<p><b>BRANDAUER, JULIA</b></p> <p>1. Comment noted.</p>

Here are my questions:

So, how much oil is up there? And, how far from the river are they proposing to drill? Would many / any new roads have to be built? What would the ROI look like when we factor in highway maintenance/ repairs and the construction of new roads, if indeed new roads are even necessary?

1 { I'm certainly not persuaded that Montana drivers will be unable to pass only when safe if the trucks run. And if they don't, it will be their fault, not the trucks' fault. I have a different perspective, perhaps, after living and driving in a very dangerous driving country. If something like this will bring jobs and the drilling ... See Moreis done carefully and responsibly, my first reponse is that it *\*may\** be a good idea. Our nation's economy is so dangerously weak and I support job growth.

In terms of quantity, I'm mixed. Nat'l security wise, it makes sense to drill our own oil and not support Wahabbi (sp) terrorists. But, if the quantity in question is so small as to have no substantial impact on the national supply, I'd rather see the N Fork left alone.

2 { Last and most importantly, leave teeth in regulatory framework. If there is damage done environmentally, beyond what is to be expected from the basics of the project itself; in other words, if negligence or malice contribute to environmental damage, make damned sure the perpetrators operate within a framework that makes them PAY UP.

Regards,

John Brandt  
Secure Systems Analyst  
Colorado Springs, CO 80919  
(I'm a Montana native)

**BRANDT, JOHN**

1. Comment noted.
  
2. See response to Common Comment L.

1 { I think an extended comment period is necessary, at minimum, and I strongly urge that a full EIS be done. The EA does not fully address concerns about impacts on wildlife and streams, emergency plans, and road maintenance and traffic. The financial benefit to Montana does not outweigh the potential harm of this project.

Cynthia J. Braun, 1321 Jackson, Missoula (concerned citizen)

**BRAUN, CYNTHIA**

1. See responses to Common Comments F1, B, I, H1, H2, H3, G, L and M.

My name is Lee Bridges, I'm from East Missoula, MT and I am a concerned citizen.

1 { I support the Missoula City Council Resolution, proposed by Jason Wiener. Please extend the public comment period for at least another 30 days. I've only recently learned of all this and have spoken to many other concerned citizens who would like to get involved in the public comment process, after they (and myself) can do further research on the matter.

2 { I feel the 32J permit should be denied based on the fact this is a company trying to railroad the public into thinking this is a benefit to our State, without having an appropriate (major Millions \$\$\$\$) bond in place, nor the appropriate impact studies.

3 { I don't feel enough consideration has been given to the "human error" factor. You're talking about these gigantic loads being transported over pristine scenic roadways and watersheds in the middle of the night. What about driver/operator drowsiness? Accidents Can and DO happen, and it doesn't appear to me, in reviewing the public hearings, that Imperial Oil has much of a plan in place to deal with a worst case scenario. You are talking Mountain Passes, in the winter time with blizzard conditions, icy road surfaces, and limited visibility. In addition, there are wildfire possibilities throughout the summer months, again, limiting visibility and rescue workers, Hot Shot crews, etc.

4 { By the looks of these giant loads, have you actually driven the route proposed and considered the ramifications? Are you planning on going through these corridors and ripping out chunks of trees these rigs will be damaging? How are you going to get a crane that is big enough to handle this type of a load, should it leave the road surface, in a likely probable area like our narrow waterway sections? What kind of traffic delay are you setting up the public to have to deal with should a likely catastrophe like this happen? Would a crane of that size even be available, and over what kind of time period??

6 { And our bridges....are you really believing that these 600,000# loads won't effect bridges up the Blackfoot? Highway 93? Highway 12?

I urge you to use some "COMMON SENSE" and seek further studies of the impact these loads are going to have on our State, from all aspects, not just for the benefit of Imperial Oil. They already have other routes in place, why sacrifice our pristine State roadways to the abuse these loads will place on roadways, watersheds, tourist areas, people's schedules, and the Public and Environment, in general.

That you would allow such an atrocity as this to take place, is unbelievable to me. I urge you to hold our State in higher regard and insist upon further, more intensive Environmental

**BRIDGES, LEE**

- 1. See response for Common Comment F1.
- 2. See response to Common Comment L.
- 3. See response to Common Comment H2.
- 4. See response to Common Comment H2.
- 5. See response to Common Comment L.
- 6. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs.



7 { Assessments. You can always get your facts together and make the right decision....but once you jump into something like this to appease a Corporation's schedule, it's too late to turn back. Since when have you ever withdrawn a permit?? Do the right thing and take the appropriate amount of time to really assess what's going on here. I know Imperial Oil has painted a nice picture for you to look at, but consider all the facts and learn to think outside the box. Think of the ramifications to our State. Once the damage is done, it is never UN-done. It's that way forever. Don't go there, please. THINK about this! Listen to the Citizens of the State of Montana!

Sincerely,  
 Lee Bridges  
 203 Clyde St.  
 East Missoula, MT 59802

7. See response to Common Comment B.

1 { I am writing in opposition to the plan to allow Exxon to move huge oil/mining equipment through our state using their current transportation plan. I am very concerned about the environmental impacts as well as the longterm effect on taxpayers to repair and maintain roads. They are obviously trying to create a more cost effective route for themselves with no regard for its impacts on Montana's citizens, wildlife, wild river corridors, etc.

2 { I say we say no and send them back to their safer and less impactful route they have used in the past. I no way do I want to see the Lochsa, Lolo, Blackfoot route become an industrial corridor. Please slow down this process and require an actual environmental assessment done by a company that has no ties to the oil or mining companies.

Thank you,  
 Jan k Brocci  
 2109 42nd St  
 Missoula, MT 59803

**BROCCI, JAN**

1. See response to Common Comment M.

2. See response to Common Comment B.

1 { I'm writing to STRONGLY OPPOSE the use of Montana highways, or any US highways, to move mining equipment to Canada. This will be a highly disruptive and destructive project for Montanan's who live anywhere near the planned corridor. The construction of turnouts, the widening of turns, the incredible number and length of delays and the number of days for this project lead me to think that it was unconscionable for state officials to even consider cooperating with this plan. I simply do not have any faith that the environmental impact of this project and the disruption to the lives of the citizens of Montana was approached with any more than wishful thinking that it will all work out OK. Finally, I strongly oppose cooperating with a project who's end goal is one of the most environmentally destructive forms of resource extraction. What in the world were the people who entertained the idea of approving this project thinking. It certainly was a pipe dream to think that it would not infuriate all who have to deal with the destruction and inconvenience in order to support another country's irresponsible mining efforts.

2 {

Sincerely,  
 David Brown  
 631 Crestline Dr.  
 Missoula, MT 59803  
 406 543-3261

**BROWN, DAVID**

1. See responses to Common Comments G, I, and O.
2. See response to Common Comment E1.

To Jim Lynch, MDT et.al.,

This is in regards to the Kearn Module Transport Project EA.

1 { The present and the future of Montana's value as a place to live, recreate for it's citizens and for future generations of Montanans and visitors is a great concern to me. I love our wilderness. I love our waterways. I also realize that to access our recreational areas it usually takes some kind of motorized vehicle to gain access. This usually means the use of fossil fuels.

2 { I am not against limited use of vehicles and gasoline. What I am against, rather what concerns me, is the impact of huge vehicles that would be using our highways. Specifically I am referring to the kind of rigs proposed by the KMTP EA that would use our highways. If these rigs were the size of typical 18 wheelers I probably would not be too concerned. They use our roads, they degrade a little faster but probably not too noticeably. However these humongous rigs, almost the length of a football field, are bound to degrade our highways. And who is to pay for the cost of the repair of these roads? The Taxpayer who resides here?

**BROWN, ED**

1. Comment noted
2. See response to Common Comment L.

3	<p>{ Assuming the roads degrades there will be runoff in to our creeks, rivers and other waterways. We have just had one superfund cleanup in Bonner. Why take a chance on another environmental disaster?</p>	3. See response to Common Comment O.
4	<p>{ In addition the "amenities" i.e. road widening to accommodate these gargantuan machines will change the scenic and pristine highways along Lolo Creek and the Blackfoot river. The company proposing this work said in the public questioning held at meadow school that there would be Zero effect on our waterways. The way they would construct the roads, or reconstruct, would not harm our streams with accidental runoffs. They have no contingency plan in case of accidental spillage, runoffs, human error or acts of God. Why does this strike me as strange? Would you or anyone go out for an ride in your car without a spare tire? Why do car manufacturers include a spare or mini tire with a new car? I believe that answer is obvious: just in case the unexpected occurs. You or I may have blow out, a bad tread, a nail, go over a sharp rock or a whole host of other possibilities. Why should we expect anything less from Imperial Oil, Exxon, any company, entity or any business? Every business or individual should procede with a "what if" contingency. Imperial Oil is not doing this. Nor is Exxon.</p>	4. See response to Common Comments J and O.
5	<p>{ There is an obvious enviromental disaster that is happening in the Gulf of Mexico right now because BP did not take proper precautions. Lost in the environmental mess is that 11 men, that's 11 human beings are missing and assumed dead. How much a human life worth? to the person, their families, friends and our community at large?</p>	5. See responses to Common Comments I, O, H1 and H2.
6	<p>{ But let's get back to Montana. 30 days of public comment for a ricketty Environmental Assessment is not long enough. We are talking about Montana infra structure, waterways, wildlife, aesthetics, and more. We need at least 90 days to have an environmental assessment on the impact of the transportation of the machinery and road construction which will change the landscape of our waterways and roads physically but could alter permanently in ways we can not imagine in the moment or in the future. We need to include more parties in this EA. We probably need a full EIS. But before we get to that point I implore you to extend the EA 90 days. It is only right for Montanans who live here and for the people who come to visit or travel through our great state.</p>	6. See response to Common Comment F1.
7	<p>{</p> <p>Respectfully,          Ed Brown          Edward Brown          108 Passage CT          Missoula, MT 59803          Phone: 406-542-3148 Fax: 978-418-0737  <a href="mailto:edbrown@bigsky.net">edbrown@bigsky.net</a></p>	7. See response to Common Comment B.

To: Tom Martin, Montana Department of Transportation

Dear Mr. Martin,

My first reaction upon hearing this proposal was "not Highway 12!" I have always loved this stretch of road and think it does not deserve the treatments being proposed.

I am aware of the fact that MDT is the responsible authorizing agency and that they recommended an environmental assessment be drawn up. At first glance, the public should at least have more time to consider the proposal and make comments to the EA. I hope that the comment period is extended.

If indeed this proposal is approved, I would love to see Exxon / Imperial Oil held responsible for, at the very least, a clear breakdown of the supposed gains to the Montana economy, a comprehensive contingency plan for accidental load turnover or load loss, and a binding agreements to the future maintenance of roads, turnouts and bridges damaged by this overuse.

A more comprehensive and inclusive EIS needs to be written in order to capture all the losses and gains of a project of this magnitude. Thank you for your consideration of my points.

Sincerely,  
Erin Brown

To Department of Transportation:

The more I learn about the proposal to haul mining equipment to Alberta the worse it gets. There are two major reasons this proposal should be turned down:

1. The economic analysis in the environmental assessment does not address all costs to Montanans. These costs will be substantial both in terms of road costs and loss of economic opportunities in Montana. I believe the environmental damage caused by the road work along he Blackfoot will be substantial and long term. The Blackfoot is a special place and needs to be kept that way for present and future generations to enjoy.

2. The mining of tar sands is going to be an enormous environmental tragedy in the Canadian boreal forest. Producing oil from tar sands will in itself produce huge quantities of greenhouse gases. It will disrupt extensive areas of the boreal forest ecosystem with loss of critical habitat for many species, some of which are already in serious decline.

3. I urge you to do a thorough evaluation of the total costs and benefits of this proposal. I believe it definitely should be turned down.

Jim Brown  
1504 Woods Gulch Rd  
Missoula, MT 59802

**BROWN, ERIN**

1. See response to Common Comment F1.
2. See response to Common Comments M, H3, and L.
3. See response to Common Comment B.

**BROWN, JIM**

1. See responses to Common Comments M and O.
2. See response to Common Comment E1.
3. See response to Common Comment L and Common Comment M.

<p>1 { I want to express my strong objections to the proposed use of our highways in Western Montana to ship equipment intended for the Alberta Tar Sands Development project.</p> <p>As I see it, there is very little, if any benefit to the State of Montana to allow this to take place. It will surely cause safety concerns, time delays for regular traffic and accelerated “wear &amp; tear” on the affected roadways.</p> <p>Even more importantly, in my opinion, support of any sort for such an environmentally disastrous process is completely irresponsible.</p> <p>It seems as though time after time short term monetary gain takes precedence over long term responsibility.</p> <p>Let’s do the right thing here and “Draw a line in the sand!”. There probably is little that can be done to stop the development but maybe we can at least not be a part of it.</p> <p>In case it matters, I do not fit the stereotype of a political activist. I am just a citizen who is offended by all the ramifications of wrongdoings such as this.</p> <p>Jim Brown 503 South Willson Ave Bozeman, MT 59715</p>	<p><b>BROWN, JIM</b></p> <p>1. See responses to Common Comments G, H1, H2, H3, L, and E1.</p>
<p>1 { From all that I have read lately, this need an extension of time for comment on the EA.</p> <p>It needs further review.</p> <p>Raymond D. Brown</p>	<p><b>BROWN, RAYMOND</b></p> <p>1. See response to Common Comment F1 and B.</p>
<p>MDT,</p> <p>As a tax-payer, a native-Montanian, and your employer, I demand that the MDT DOES NOT issue these permits for the Kearl mining equipment transportation corridor. This project does not make sense for anyone except Imperial Oil/Exxon.</p> <p>The EA is completely lacking in thoroughness. Here are my demands and comments on the EA:</p> <p>1 { * You need to extend the public comment period beyond May 14th. 30 days was completely insufficient for real public involvement, and the fact is, we will be impacted by this project for years to come. We deserve more time to raise our voices.</p> <p>2 { * As federal dollars will eventually be used on this project, we need to make this a NEPA assessment and move onto an EIS.</p>	<p><b>BROWN, ZACK</b></p> <p>1. See response to Common Comment F1.</p> <p>2. See response to Common Comment B.</p>

<p>3 { * The EA's assessment of impacts on the Lolo Creek watershed are completely insufficient. Building all of these turn-outs will absolutely have more than "little to no impact" on this creek. Tax payers will have to continue to foot the bill for stream restoration, when sedimentation is worsened.</p>	<p>3. See response to Common Comment O.</p>
<p>4 { * The EA does not even take into account negative economic impacts--industries like natural tourism and outdoor recreation will be negatively impacted. The EA needs to explore these issues.</p>	<p>4. See response to Common Comment M.</p>
<p>5 { * The MDT and the EA need to recognize that this project will open the floodgates for more high-and-wide transportation projects, in effect creating a permanent corridor.</p>	<p>5. See response to Common Comment K.</p>
<p>6 { * The long-term impacts of road wear-and-tear are not addressed. Roads will be worn down more quickly, and down the road, tax payers will be left holding the bag.</p>	<p>6. See response to Common Comment L.</p>
<p>7 { * The EA does not address any kind of emergency recovery plan in the likely event that one of these trucks goes into the Lochsa or Lolo Creek. The EA needs to include such a plan  MDT: You are employed by the people of Montana. You need to have our best interest in mind. This proposed corridor will only be of benefit to Imperial Oil. Remember, YOU ARE WORKING FOR MONTANA-NOT EXXON/MOBIL.</p>	<p>7. See response to Common Comment H2.</p>
<p>8 { We need to make this project a federal one--we need an EIS.  Respectfully, Zach Brown 406.579.5697</p>	<p>8. See response to Common Comment A and Common Comment B.</p>

**BROWNBRIDGE, TP**

<p>Project Commenting On: big rig transport along the Lochsa Project State Highway No.: 12</p>	
<p>Comment or Question: 1 { Please review ths plan and find an alternative route as this is bad precitent to set in a wild and senic corridor.I do not want my tax dollars wasted on a project that benefits a foreign manufacturer and an out of state energy developer .This should be at a net zero cost at minimum to the tax payers.I can not see how this won` t negatively impact tourism and tourist dollars to the state.Thanks for listening.  TP Brownbridge Granite Co.,MT</p>	<p>1. See response to Common Comment D1, J, L, and M.</p>

Hello,

I would like to submit my comment opposing any widening or expansion of route 12 through northern Idaho. A highway next to a wild and scenic river is no place for wide loads destined for Canadian oil fields. If you have ever driven this route you know that anything larger than a large van is way too big for this road! The amount of diesel fuel that is currently spilled through accidents by big rigs yearly is completely unacceptable.

It should be obvious to anyone with even basic and cursory knowledge of Salmon, Steelhead, Bull trout and Pacific Lamprey that any additional degradation of this special place will directly affect these struggling fish populations. This would be tragic and cannot be allowed to happen.

Thanks for accepting my comments,

Chris Brozell  
Dillon, MT

**BROZELL, CHRIS**

1. See response to Common Comment E2.

**ELLEN BUCHANAN 431 W. ALDER STREET MISSOULA, MT 59802**

April 29, 2010

Dwayne Kailey  
Tom Martin  
Montana Department of Transportation  
PO Box 201001  
Helena, MT 59620-1001  
RE: Kearl Module Transportation Project

Dear Mr. Kailey & Mr. Martin:

Please enter these comments into the public record for purposes of the public input process for the Environmental Assessment for the above referenced project. Let me begin by stating that I am very concerned that the MDT would permit this project to take place in Montana with such a cursory review which limits the assessment of environmental impacts to an EA rather than subjecting this to a full Environmental Impact Statement. I also fail to understand how, since this is a multi-state project which takes place on highways supported by federal funding, the requirements of NEPA are satisfied when the project is segmented and Montana is reviewed solely under MEPA. Another major concern is that the KMTP project has been reviewed only with respect to this hauling project with the premise that it will be 12 month project. There is every

**BUCHANAN, ELLEN**

1. See response to Common Comment B.
2. See response to Common Comment A.

<p>3 { indication that, if this is approved, it will result in a permanent High/Wide industrial corridor through Idaho and Montana. The Port of Lewiston is banking on that as is evidenced by their anticipation that “if one oil company is successful with this alternate transportation route, many other companies will follow their lead”. Even MDT’s Director Lynch acknowledged this in testimony before the Legislature’s Revenue and Transportation Oversight Committee last year when he stated that the goal was to create permanent high/wide corridors through Montana which would have considerable potential for impact. MDT has stated that the approvals for this project and the EA are only for the purpose of this project and that any subsequent haul projects would have to go through the same permitting and environmental review process. That may be true, but once these highways have been modified for the KMTP project, the door is wide open for all comers. The modifications will have been made and consideration for subsequent permits would be limited to issues such as weight limits and traffic delays, making the permitting process little more than a formality. At a minimum, any environmental review for this project must take the possibility for permanence of this route into consideration.</p>	<p>3. See response to Common Comment K.</p>
<p>4 { This project has the potential to adversely impact some of our most scenic highways and rivers in our state, not to mention the potential harm to wildlife and aquatic life. I understand that the excessively large loads will be distributed over numerous axles in an effort to minimize damage to road surfaces; however, it is hard to accept that many of these roadways, particularly Highway 200 along the Blackfoot River, were constructed to become a temporary, much less permanent, industrial haul corridor. The nature of these roadways is not conducive to accommodating loads of this length or width, regardless of the number of new turnouts that are constructed. It is difficult to visualize how turnouts and parking areas can be expanded and newly constructed, particularly along river banks, without significant environmental degradation. The EA simply pays lip service to the construction concerns and assumes that building these new facilities will address numerous issues without truly assessing the impacts of the construction along these scenic and fragile corridors. Due to the nature of this route, we will end up with one or more of these rigs in one of our rivers or creeks and the damage to the roadways, banks, native vegetation and aquatic life will be significant, if only because of the sheer mass of equipment. There is also no consideration of impact to endangered species in the assessment. These routes are along Lolo Creek and the Blackfoot River, both significant spawning grounds for the endangered bull trout which will be adversely impacted by expansion of existing turnouts along the banks and the repercussions of accidents caused by this activity. There is nothing in the EA that</p>	<p>4. See responses to Common Comments I and J.</p> <p>5. See responses to Common Comments O and L.</p> <p>6. See responses to Common Comments H2 and O.</p>



- |    |   |  |  |
|----|---|--|--|
| 7  | { | speaks to mitigation of the impacts of construction or accidents. It is not sufficient or credible to simply state that accidents will not occur, particularly in the Rocky Mountains during winter months and in areas where dense fog is not an anomaly.   | 7. See the response to General Comment H.  |
| 8  | { | Tourism is a major industry for Montana, particularly the western part of the state. The impacts to this driver of our economy have not been addressed as is evidenced in Table 1, Summary of Effects and Section 6, Economic and Community Impacts. The EA only assesses the impact of one time and short term money being spent in the state. There has to be consideration of the impacts of construction and hauling on our tourist industry, even if impacts to our citizens are not taken into consideration. Millions of dollars are spent here each year by people coming into Montana to fish, backpack, hike, hunt and just sight see. This review does not address the impacts of construction delays, accident delays, inconvenience created by the large rigs and impaired access to rivers and trails. The impact to Montana's outfitters could be significant, but the EA does not address that or any of these economic impacts. | 8. See responses to Common Comments G and M. Project not expected to impact access to rivers and trails along route. |
| 9  | { | The EA does not address the potential impacts on delivery of emergency services. When one looks at the proposed route, there are instances where the presence of one of these haulers could delay emergency vehicles for long enough to cause serious damage or fatalities due to the inability to get to the scene of an incident or transport a patient to medical services. If this review is confined just to Missoula, access from the Bitterroot Valley and from the Seely/Swan and Blackfoot Valleys are extremely vulnerable. This impact requires consideration and any plan must address how these impacts would be mitigated.   | 9. See the response to General Comment H3.   |
| 10 | { | In the consideration of alternatives to the creation of this industrial haul route through Idaho and Montana, all alternatives that were examined were deemed to not be feasible. This determination was not based on physical barriers, but economic considerations. In other words, Montana is being asked to bear the burden of accommodating the transport of these oversized modules to save Imperial Oil money. While economics is a consideration in evaluating the feasibility of alternate routes, it is certainly not the only consideration. If this is an acceptable standard, the evaluation must place a value on the degradation of scenic roadways and waterways as well as the impacts on wildlife and aquatic life that will most certainly occur, regardless of the conclusions drawn by Tetra Tech on behalf of Imperial Oil.  | 10. See the response to Common Comment D1.   |
| 11 | { |  | 11. See the responses to Common Comments J and I.  |
| 12 | { | The most consistent methodology used throughout the EA is the pattern of simply making a determination of no impact; therefore, no mitigation is required. This is so prevalent in the document that it is curious that MDT has determined that the assessment is adequate to present to the public for comment. This approach is  | 12. See Section 3.13 where mitigation to minimize impacts is listed for all project activities.                      |

- completely contrary to the purpose of the environmental review process, whether under the auspices of the State or the Federal government. MDT should reject this EA as inadequate and require that the project be reevaluated properly or simply make a finding that a full Environmental Impact Statement is required.
- 13 { A 30 day comment period for a project of this magnitude is absolutely not acceptable. The Kearl Oil Sands Project is expected to be active through 2060 and if this does
- 14 { become an accepted Industrial High/Wide Haul Corridor, it could be used for many years beyond 2060. MDT has known about this project for several years, but the period for public review and discussion is being severely limited. In many ways, it feels like Montana and Idaho are being treated like third world countries that will welcome a few new dollars into the economy and simply allow our real legacy be forever changed without appropriate public knowledge, discussion or input. The State of Montana owes its citizens far more respect than is being displayed with this project.
- 15 { I urge the Montana Department of Transportation to require that a full Environmental Impact Statement for the Kearl Module Transportation Project be completed prior to any action being taken. The EIS must include a real evaluation of alternatives, unlike the treatment in the current EA, and must address the true environmental, economic and community impacts of a permanent Industrial High/Wide Haul Corridor.

13. See responses to Common Comments B and F1.

14. See response to Common Comment K.

15. See response to Common Comment B.

Sincerely,  
 Ellen Buchanan  
 406-531-9297

Braden Burkholder  
 Citizen  
 801 Aster Ave  
 Bozeman, MT 59718

Dwane Kailey  
 Montana Department of Transportation  
 2960 Prospect Avenue  
 P.O. Box 201001  
 Helena, MT 59620-1001

May 5, 2010

**BURKHOLDER, BRADEN**

Dear Dwane:

I request that you consider the following comments on the Environmental Assessment (EA) for the Kearl Module Transport Project:

Although I have a few concerns regarding this project and the impact it will have on the natural resources and communities of western Montana, the most pressing is the finding that utility relocation along the travel corridor will not have a negative impact on wildlife, particularly on bird species. There are impacts of this action (specifically, raising 360 above ground utility crossings) that are potentially significant and should be mitigated. Permanently raising these utility crossings present an additional hazard to all bird species,<sup>1</sup> not just raptors, and needs to be addressed within the scope of this project.

The dimensions of the largest module on a trailer are not listed in the EA. Supplementary documents (MT Transportation Plan and Appendices) lead me to the conclusion that the maximum height will be around 30 feet. From this figure I can only estimate that overhead utilities will be raised as much as 15 feet in some locations, if not more, depending on line clearance specifications provided by individual utilities. Regardless of whether or not this increase in height would result in more bird power line strikes and mortality (it is quite possible that it would<sup>2</sup>), mitigation measures should be applied to decrease the likelihood that bird mortalities would become more common at these crossings.

The EA states that utility relocation, specifically overhead utility structures, will “be constructed in compliance with raptor safe guidelines” (APLIC 1996). First, I hope the contractors intend to use the most current guidelines, APLIC (2006).<sup>3</sup> Second, while these recommendations include important modifications to power pole structures to decrease bird mortality, it does not cover techniques to reduce line strikes. These methods include the application of bird flight diverters or fireflies and have proven effective in reducing bird strikes.<sup>4,5,6</sup> Utilities are starting to deploy diverters regularly to comply with state and federal migratory bird laws, as well as increasing system reliability.<sup>7</sup> The use of diverters of any sort on elevated spans of utility line would be an important first step toward mitigating the impact of the higher overhead lines. Without these mitigation measures, I cannot support the proposed action.

Along these same lines, I find it interesting that the US Fish and Wildlife Service was consulted, but Tetra Tech did not consult any representatives of Montana Fish, Wildlife and Parks (MFWP), the agency responsible for managing the vast majority of wildlife species in Montana. Had Tetra Tech consulted with anyone in MFWP, these concerns would (most likely) have be brought up and addressed earlier.

Beyond this primary concern, I have other concerns about the impact of this project on local communities and the level of environmental review used in this process. Although the statement is surprisingly absent from the Environmental Assessment posted on the MDT website, the MDT and partnering private corporations seem to imply they have conducted the appropriate level of review for this project and that an Environmental Impact Statement (EIS) is unnecessary. I believe this statement is required, per MEPA Model Rule V (3)(j)<sup>8</sup>: “If an EIS is not required, the

1. The utility crossing that would be raised are already overhead wires, raising them by 5 to 15 feet will not increase the risk to birds because the only portion of the utility crossing that will be affected are the sections from one pole to the other crossing the highways, not the entire line length. Additionally, approximately 200 crossing will be removed and place underground. Table 9 shows the maximum dimensions of the module configurations.

2. See response to Specific Comment A.

3. The EA erroneously left out a discussion of the consultation with Montana FWP that occurred. The details have been included in Section 4.6 of the FONSI.

4. See response to Common Comment B.

EA must describe the reasons the EA is an appropriate level of analysis." Without the statement that an EIS is not warranted and reasons for such a conclusion, this EA document appears to be incomplete and void.

Furthermore, I find it disingenuous for leadership in Montana to claim that this project will not create a permanent oversized load travel corridor through western Montana. While it may not create an *official* "high/wide" travel corridor through Montana, it does create a *de facto* one. I would argue that by allowing for permanent modifications to be made for this temporary high/wide corridor, the MDT has thus set a precedent for quickly approving extensive shipments of high/wide loads through Montana along this route (since no future construction would be required). This is essentially "a decision in principle about such future actions," which is the basis for the finding of significant impact under MEPA Model Rule IV (1)(f)<sup>8</sup>. Thus, while I accept that impacts to the natural environment (excluding the exception regarding utility relocation detailed above) have been appropriately mitigated in this plan for the short duration of this project, the cumulative impacts of a *de facto* travel corridor through Montana to the human environment over the next few decades are significant and warrant the completion of an EIS.

In summary, I do not support the proposed action as it stands. Additional mitigation measures need to be employed to reduce bird power line strikes on raised overhead lines. An EA level of review is inadequate and an EIS is warranted.

Thank you for the opportunity to comment.

Sincerely,

Braden Burkholder

5. See response to Common Comment K.

Public comment taken over the telephone on May 14, 2010 (9:10 am) from:

Dorothy Bush  
 2623 Muirfield Court  
 Missoula, MT 59808  
 Comment

**BUSH, DOROTHY**

1) Concerned with long term impacts on roads and especially bridges. I read in paper weight of module is distributed but weight too much for bridges. Who will pay for lawyers to defend any impacts on infrastructure?

2) Main owner (Imperial Oil)-What is their liability? Are they trying to limit liability behind Imperial Oil and not Exxon?

3) Size of pieces being moved-made because of cost effectiveness. Could have been built in

1. See response to Common Comment L.

2 { smaller pieces. Could have been assembled in Canada. Cost effective for them, damn for the states. Worth \$68 million, they will pay \$21 million with modifications. Where is the \$68 million coming from?

3 { 4) Disintegration of roads on hot days-damage will occur, are you planning to do more in requiring any compensation?

4 { 5) Environmental, tourism, and disruption of human lives will occur from project.

5 { 6) One additional objection from reading the Missoulian article today, petition is looked at as one comment, not fair.

- 2. See response to Common Comment D1. The \$68 million is from all the construction, permitting, and module transportation support that would be done by Montana residents.
- 3. See response to Common Comment L.
- 4. See response to Common Comment M.
- 5. A representative sample of the text included in the NRDC e-mails is included in the response to comments section (Appendix D of the Decision Document) along with an appropriate response. There is no need to repeat the comment and response. A list of the names of the people who submitted the comment is also included in Table D-1.

Imperial Oil/Exxon Mobil, those small companies!!

They want to run 200 super-sized loads through western Montana! You, Mr. Lynch, are responsible for our highways.

Once those 200 huge rigs have finished destroying the various roads, we Montanans are left to spend the money to repair the roads. Each rig will be about 170 tons, or 340,000 pounds. By Federal standards, the maximum truck weight is 80,000 pounds. In other words, each trip will exceed the standard by more than FOUR times. And these companies want to make that trip, not once, but 200 times.

1 { I suggest that IO/EM put up a billion-dollar bond, that's \$1,000,000,000. The money is to be released, minus the money required to repair the highways, one year after the repairs are completed.

Bob Bushnell  
Olga Lincoln  
Polson, MT 59860

**BUSHNELL, BOB**

- 1. See response to Common Comment L

Charles D. Buskirk  
1115 W. Third St.  
Anaconda, MT 59711  
(406) 560-3751

May 14, 2010

Dwayne Kailey  
Montana Department of Transportation  
PO Box 201001  
Helena, MT 59620-1001

Dear Mr. Kailey:

I am writing to express my deep concerns about the proposal for a "High and Wide" Transportation Corridor in western Montana.

1 { According to a July 2009 presentation by MDT Director Jim Lynch to the MT Legislature's Revenue and Transportation Oversight Committee, ExxonMobil's goal is to create "**permanent** High/Wide corridors through Montana," which, he said, would have "considerable potential for impact." I am confused, therefore, that the Environmental Assessment (EA) for the project portrays it as only a one (1) year project with 200 vehicles, and no environmental impact.

2 { Typically, environmental documents must address the full impact a project may have over its lifetime. The EA does not address ExxonMobil's goal of creating a permanent industrial corridor next to a Wild and Scenic River and the place where "A River Runs Through It". Some of the many impacts that must be considered include:

- 3 { • The Alberta Oil Sands project is expected to last through 2060 – entailing the movement of this large equipment for many years over the proposed route. The long term effects of this volume/size of traffic must be evaluated.
- 4 { • Wildlife impacts and fatalities created by traffic snarls.
- 5 { • Water quality impacts if the inevitable accident happens that creates a damming effect on the rivers, or if hazardous materials released.
- 6 { • Impacts on the blue-ribbon trout waters from the above "accidents" and those potential impacts on tourism and our Montana way of life.
- 7 { • Impacts on fishing and rafting guides and outfitters that rely on access to the rivers.
- 7 { • Noise and lighting impacts.
- 7 { • Impacts associated with the construction activities on turnouts, utility lines, etc.

8 { I urge the Montana Department of Transportation (MDT) to require a full Environmental Impact Statement (EIS) on the creation of at least the Montana portions of this industrial corridor. The EIS should at a minimum:

- 9 { • Conduct a programmatic review for the establishment of a permanent industrial corridor;
- 9 { • Require real alternatives to be considered;
- 9 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 9 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts.

Thank you for this opportunity to provide comments on this important issue.

Sincerely,

Charles "Doug" Buskirk

## BUSKIRK, CHARLES

1. See response to Common Comment K.
2. See response to Common Comment C2.
3. See response to Common Comment K.
4. See response to Common Comment I.
5. See response to Common Comment H2.
6. See response to Common Comment M.
7. Impacts on noise and lights (see Section 3.0) and turnout and utility crossings are addressed throughout the EA.
8. See response to Common Comment B.
9. See response to Common Comments C2, M, and A.

Dear Sir/Madam

1 { This E Mail is being sent to express my opposition to the movement of the massive mine equipment through Montana to Alberta. I understand the proposal will move the equipment 350 miles from Lolo Pass to the Canadian border north of Shelby. This will cause a major disruption of traffic on the route indicated and will involve damage to the surrounding landscape. Much of this will occur during the busy tourist season and will cost merchants a major loss of business, which will also mean a loss of state revenue. I don't think the offset of money generated by the construction work will benefit the state. Remember the merchants are here all the time, not just the brief period the construction workers will be here.

2 { I also have an objection to the irreversible damage to the environment and health impact it will have on humans, that tar sands mining causes. Even though the mining project is in Canada, we need to be stewards of the land and environment in the world. I understand it is much more invasive than conventional mining.

3 { I would encourage you to insist that a full environmental impact statement will be provided before a decision is made and that we will not allow the movement of the equipment will be denied.

Thank you for allowing me to comment.

Sincerely,

Gerald F Butcher  
 3429 8th Ave. North  
 Great Falls, Montana 59401

May 12, 2010

To: Montana Dept. of Transportation

Re: Tar Sands Truck Route

This letter is in regards to the proposed truck route for Kearsarge Module high/wide/heavy transport plan from Lewiston, Idaho to Alberta through Western Montana and Missoula on Highways 12, 93, I-90, 200, and 287.

1 { The Bike/Walk Alliance for Missoula concurs with the Missoula City Council's Resolution Number 7528. Resolution 7528 requests a full Environmental Impact Statement be conducted under the Montana Environmental Policy Act and the National Environmental Policy Act. Failure to complete a fully programmatic NEPA analysis

2 { would not fully describe the environmental impacts this proposed operation will have on

**BUTCHER, JERRY**

1. See responses to Common Comments G, J, and M.
2. See response to Common Comment E1.
3. See response to Common Comment B.

**BWAM BOARD OF DIRECTORS**

1. See response to Common Comment B.
2. See response to Common Comment A.

<p>Missoula and Western Montana.</p> <p>3 { The Bike/Walk Alliance for Missoula asks for your support in conducting a comprehensively scoped and full Environmental Impact Statement to provide for a lucid examination of the proposed truck route.</p> <p>Sincerely,</p> <p>BWAM Board of directors:          Jim Sayer, Bob Wachtel, Bob Reider, Jean Belange-Nye, Ginny Sullivan, Ethel MacDonald, John Couch, and Marta Meengs</p>	<p>3. See response to Common Comment B.</p>
<p>Greetings,</p> <p>Everything I have read and heard about the tar sands issue and the travel corridor for the equipment distresses me deeply. On the one hand, it seems inconceivable to me this is even being considered; on the other, many say it's a done deal and we can squawk all we want but it's happening.</p> <p>1 { Please reassure me that calm, intelligent minds are looking to the impacts both now and into the future, and will make the right choices. At the very least, a full EIS is in order here.</p> <p>This is huge, and irreversible. It's not just a Montana issue, but Montanans must step up and do what's right, which is to say NO to a permit.</p> <p>Thank you,          Kerrie Byrne          PO Box 4471          Whitefish, MT 59937</p>	<p><b>BYRNE, KERRIE</b></p> <p>1. See response to Common Comment B.</p>
<p>1 { Cathleen Caballero, Polson, MT. Concerned citizen and farmer. Given the enormity of the modules, the complexity of the travel plan, the sensitivity of the natural surroundings of the highway to be used, especially along Lolo Creek and the Blackfoot River, this EA appears glib and superficial. Accidents with unforeseen and tragic consequences happen contrary to all the good intentions of energy companies and regulatory agencies, as the ongoing disaster in the Gulf Coast attests. Please slow this plan down and offer alternative travel routes. I also have a related but tangential question: why are these modules being brought from half way around the world (South Korea) when manufacturing centers exist so much closer to the target area of northern Alberta? Thank you.</p>	<p><b>CABALLERO, CATHY</b></p> <p>1. See responses to Common Comments O, H1, H2, H3, D1, D2, and D3.</p>



Dear Mt.gov,

Although I look forward to a COMPLETE and THOROUGH analysis of the proposed "upgrade" of Montana's scenic river roads, at this time I am NOT supportive of additional construction or alterations which would allow larger trucks access and affect adversely the status quo. I favor leaving unchanged the roads near the Lochsa and Blackfoot Rivers which currently appear more conducive to tourist and recreation industries, which we should encourage, and not diminish or degrade. Please carefully consider alternatives along existing highways.

Sincerely,

Edward Callaghan

**CALLAGHAN, EDWARD**

1. See responses to Common Comments D1, J, and M.

To whom it may concern:

I urge you, MDT, to consider all the impacts of moving high and wide heavy equipment through Idaho and Montana on route to the Kearsarge Oil Sands Project.

I ask that a full EIS be prepared rather than an EA and to consider the cumulative impacts, including the projects contribution to global warming. Besides the damage tar sands mining does to the environment and it's extreme contribution to global warming, there is the logistics of hauling this equipment on the proposed route. I understand that Imperial Co. would want to use this route since it is shorter on land than the current route and the route has no low overpasses. However, it seems that the narrow windy roads along pristine river courses do not lend themselves to easy transport of heavy equipment of such length, width, and height. What happens if one of these trucks wrecks along the Clearwater, Lochsa, or Blackfoot Rivers? Have you considered the impact to summer tourist travel along this route and winter driving conditions along this route? It seems to me that the existing route through the middle of our country, on flat land, is far safer than this proposed shortcut. I don't believe we should have to live with this inconvenience and risk any impact to our natural environment just to add to the profits of big oil companies. Exxon/Mobile consistently reports record profits even as the economy slides into recession and the gulf oil spill continues to grow. Let big oil pay more to transport their equipment on the existing route and deny their permit. It will have no noticeable impact on their profits while we will notice a huge impact on our roads for 1.5 years.

Sincerely,

John F. Caratti

**CARATTI, JOHN**

1. See responses to Common Comments B and P.
2. See response to Common Comment H2.
3. See the MTP and response to Common Comment M.
4. See responses to Common Comments D1 and D2.

Montana Department of Transportation:

I am opposed to transporting massive equipment through Montana to Alberta, Canada for the purpose of mining tar sands for the following reasons.

- 1 { First of all, we need to reduce greenhouse gases, not markedly increase them.
- 2 { Second, these convoys of trucks and equipment will severely disrupt travel, recreation, and tourism, so important to Montana. Third, the construction of frequent turnouts and the passage of these huge loads will negatively impact roads and water quality in pristine rivers and streams.
- 3 { And Fourth, the people of Montana do not want a permanent industrial route where there is now a scenic route used primarily by tourists and sports people. Please prepare a full environmental impact statement, not just an environmental assessment.

Sincerely,  
Catharine Carey  
Missoula, MT

**CAREY, CATHERINE**

- 1. See response to Common Comment P.
- 2. See responses to Common Comments G, M, O, J, M and K.
- 3. See response to Common Comment B.

- 1 { I am totally against this idea of transporting equipment destined for Canada to mine the tar sands for oil. The route chosen by industry is improper and will be a huge impact on folks using the Locksa highway as well as the Blackfoot corridor in Montana and the highways along the Rocky Mountain Front. I am a 68-year-old Montana and have resided here for 63 of those years. Please, please do not approve of this route through our wonderful state. The company needs to look at some other alternative.  
Thank you.  
Clinton E. Carlson, Florence, MT. 59833

**CARLSON, CLINTON E.**

- 1. Comment noted.

- 1 { I object. Will Imperial Oil and Exxon Mobil actually pay for any impact i.e. road re-construction or environmental impact for moving such monstrosities through such sensitive areas, not to mention the traffic issues. Please think about it.  
*Mary Carparelli*  
*Helena, MT 59602*

**CARPARELLI, MARY**

- 1. See responses to Common Comment L and G.

To the Montana Department of Transportation - My name is Dru Carr. I am a 21-year resident of Missoula, MT. My address is 619 Howell, Missoula, MT, 59802. I thank you for this opportunity to comment via email on the Kearl Module Transport Project (KMTP). I request that comments be taken into the record as part of the the KMTP Environmental Assessment process, as required by the Montana Environmental Policy Act (MEPA).

1 { I am strongly opposed to the KMTP as it currently stands, based on the Environmental Assessment, provided by Tetra Tech. I believe and request that the project decision be postponed until a full Environmental Impact Statement is carried out on this project. I believe that the EA does not fulfill the basic requirements by MEPA for : (1)the Need for the Project; (2)the economic impact to the state of Montana; (3)the public safety mitigation of the project; and (4)the environmental impacts of the project. Until such an Environmental Impact Statement is completed, I ask that the KMTP project be denied.

(1)The Need for the Project is inadequate --

2 { The EA's "Need for Project" reads: "The proposed project is needed to transport specialized equipment through Montana to Alberta, Canada." First, this statement is not true. It has been shown that a transportation route for large vehicles already exists, and has been used, by other oil companies in Canada, without the use of Montana's highways. The fact that Imperial Oil looked at, and rejected, the route through western Canada because of additional costs is not enough to satisfy the need ot transport their equipment through Montana. Montana residents are not beholden to the economic necessities of Imperial Oil, or their stockholders. The argument that Imperial Oil makes that the savings in cost for transporting through Montana are passed onto the oil consumer has not been proven to be true.

3 { Second, this project's "specialized equipment" to be transported will be used on tar sands oil extraction in Alberta, Canada. There is no "need" that will benefit the state of Montana, except for the short-term employment benefits from the construction of the needed infrastructure, and possibly (but by no means guaranteed) drivers of the vehicles. For this reason, the "need" is not satisfied, and therefore should be further explained in an EIS. The project does not have nearly enough economic impact, and in the long term, may in fact be an economic liability for the state (more on this in the "economic impact" section of these comments.A full environmental impact statement needs to be completed in order to better establish the "need" for this project.

(2)The "Economic and Community Impacts" are insufficient in the EA, and should undergo a full EIS process. The EA concludes that there will be a "Total Economic Activity" of \$67.8 Million

**CARR, DRU**

1. See response to Common Comment B.

2. See response to Common Comment D1 and Common Comment D2.

3. See response to Common Comment B.

generated by this project to the state of Montana, from both direct and indirect (economic "multiplier") effects. The EA goes to great lengths to extoll the economic virtues of the project to the state of Montana.

4 { However, what the EA completely fails to include in the economic impact assessment is the long-term need for maintenance and repair of the proposed modifications and turnouts. It is impossible to actualized the economic impact of this project without first including the economic liabilities to Montana for the on-going need to maintain this very short-term need. Without this maintenance estimate included in the analysis, the economic impact assessment is completely inadequate. The people of Montana deserve to know what it will cost to maintain this infrastructure in the foreseeable future.

5 { (3)The EA completely fails to mitigate for the unlikely, but possible, event of a vehicle turnover. I have witnessed firsthand a logging truck overturned on Highway 12, and I cannot imagine what the impact of one of these large vehicles turning over on this stretch of highway would be. Imperial Oil has admitted, in public, that there is not adequate plan for dealing with such an event. There must be an EIS that fully covers what will happen in the event of a vehicle turnover. Without this, the environmental and economic impacts are completely unmitigated, and could result in long-term, unforeseen impacts to the state of Montana.

6 { (4)The most revealing, and inadequate, section of the EA is the "Environmental Impacts" section. In the section called "Water Resources" (in the "Environmental Impact" section) concludes in 3.9.2.6 that: "The proposed project is not expected to affect water quality or water resources, streams, wetlands, or water bodies". The assessment seems to be based on a series of what the EA calls "field reviews" of these resources, along with maps and aerials of the proposed modification sites. This assessment does not pass any kind of scientific muster, and must be subject to a full EIS. the mitigation proposed, in case of a "spill", is to have "spill response" kits available to teh transport crew. This has proven to be a baseless "mitigation", because Imperial Oil has already admitted that they do not have the necessary equipment avialable in Montana to upright an overturned vehicle. In addition, the impacts of the construction of the infrastructure on water resources is so completely sparse in the EA, and requires a full EIS. The EA done by Tetra Tech does not come close to addressing the possible impacts to water resources. It is by far the weakest part of this document, and must be addressed adequately in an EIS.

Finally, I would like to address the impact of this project to Montana's quality of life. This is a personal comment, and most likely will not be admitted into the decision process in a meaningful way by the DOT, but it bears comment anyway.

4. See response to Common Comment L.

5. See responses to Common Comments H1 and H2.

6. See response to Common Comment H1, I, O, and B.

7 { The route proposed by Imperial Oil goes through some of Montana's most treasured scenic byways. I have spent a lot of time and money travelling Highway 12, Highway 200, Highway 287, and Highway 89, and my time on these highways have all been spent there because they are some of the most scenic in the state, but also access some of the most treasured opportunities for recreation that this state has to offer. I am immensely concerned that this project will have a huge impact on the aesthetic and environmental qualities of these highways that make them so unique to the state. I am concerned that they will impact not only the visual aspects, but also simply what makes Montana what it is. These kind of intangibles are so difficult to grasp, and even more difficult to put on paper, but they are deeply felt by me, and I hope in some way can be introduced into this document in some kind of meaningful way.

Thank you for the opportunity to comment on this project.

Sincerely,  
 Dru Carr  
 High Plains Films  
 (406)546-4447

7. See response to Common Comment J.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

**CASSEL, AMY**

Form Letter 1

- 1. See response to Common Comment C2.
- 2. See response to Common Comment D1 and response to Common Comment D2.
- 3. See response to Common Comment M.
- 4. See responses to Common Comment A

<p>5 { It's my understanding that this proposed corridor is the least expensive route between South Korea and the Tar Sands, but I find that difficult to believe. I'm curious if the feasibility report for this corridor vs. other routes is available to the public. It's also my understanding that this corridor was to proceed without public comment. That's very, very suspicious if true. I don't know if you have ever been down the Lochsa road, but where and how you plan to get such massive truck loads through is difficult to imagine - it's narrow as heck already. Also, if you have official information regarding this project posted on your website, could you please email me the link. As it stands right now, I'm very much opposed to the idea. Amy Cassel Missoula, MT</p>	<p>5. Although a series of routes were investigated, no feasibility study was produced. See response to Common Comment S. Your understanding that the project would proceed without public comment is inaccurate. A website will be developed, but is not available yet.</p>
<p>1 { Please complete a full environmental impact statement of the Kearle Transport project. It is unconscionable to have these trucks on our rural Montana highways.  David Cates 141 Kensington Ave. Missoula, MT 59801 406-721-3682</p>	<p><b>CATES, DAVID</b>  1. See response to Common Comment B.</p>
<p>1 { Mr. Martin: I oppose the planned transport of massive mining equipment on Montana roads for Canadian mining activity. These oversized monsters would be a major safety factor to people driving here in our state. As a cyclist, I appreciate this risk even more. Sincerely, Wayne Chamberlin, M.D</p>	<p><b>CHAMBERLIN, WAYNE</b>  1. See response to Common Comment G.</p>
<p>Dear MT Dept. of Transportation:  I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:</p> <p>1 {</p> <ul style="list-style-type: none"> <li>• Conduct a programmatic review for the establishment of this permanent industrial corridor;</li> </ul> <p>2 {</p> <ul style="list-style-type: none"> <li>• Require real alternatives to be considered;</li> </ul>	<p><b>CHONTOS, EILEEN</b>  Form Letter 1  1. See response to Common Comment C2.  2. See response to Common Comment D1 and</p>

- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

I don't see how having this Corridor will benefit the people or the state of Montana, not to mention our tourism industry! We should be promoting clean industry for the benefit of all of us!

Eileen Chontos

Chontos Design  
 101 E. Broadway, #403  
 Missoula, MT 59802  
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[chontos@montana.com](mailto:chontos@montana.com)

- response to Common Comment D2.
- 3. See response to Common Comment M.
- 4. See responses to Common Comment A.



May 13, 2010

Dwayne Kailey  
Tom Martin  
Montana Department of Transportation  
2701 Prospect Avenue  
PO Box 201001  
Helena, MT 59620-1001  
mdtcommentskearl@mt.gov

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Re: Public Comment on Kearsal Module Transportation Project Environmental Assessment

Dear Mr. Kailey and Mr. Martin:

The Clark Fork Coalition ("CFC") appreciates the opportunity to provide comments to the Montana Department of Transportation (the "Department") on the draft Kearsal Module Transportation Project Environmental Assessment ("KMTP EA") dated April 2010. As set forth below, we have many concerns with the KMTP EA, including first and foremost the failure of the Department to coordinate with federal entities to require a comprehensive review of this project under the National Environmental Policy Act (NEPA). In addition, CFC believes the KMTP EA is inadequate on several other fronts because it fails to: (a) undertake a programmatic environmental review of the creation of a permanent industrial high and wide corridor in Montana; (b) consider feasible alternatives to the proposed action; (c) employ the best available science in analyzing the potential impacts on water resources; (d) adequately analyze the potential impacts to threatened and endangered fish and wildlife species; and (e) conduct an adequate analysis of economic and community impacts.

This project is clearly integral to implementing what the project sponsor, Imperial Oil ("Imperial"), refers to as its "global execution strategies" to provide inexpensive oil for all of North America. However, despite statements to contrary, the Department and Imperial have just recently insisted on characterizing this project as a one time fairly routine transportation project that in no way establishes a precedent or a permanent high and wide corridor along the proposed route. It is no secret, though, that once the proposed highway and utility modifications are in place as a result of this project, other entities will be utilizing this route for high and wide shipments for the indefinite future. So we are perplexed that the Department has allowed Imperial to narrowly focus its environmental review to this current estimation of a 200-module shipment from the fall of 2010 to the fall of 2011 when clearly this project will lay the foundation for an unprecedented transportation corridor along narrow two lane roads through the heart of Montana's largest urbanized area. Because the KMTP EA does not even consider the direct, indirect or cumulative impacts that will result from the future use of this corridor, it is impossible for the public or the Department to make an informed decision on this project.

We request that the Department initiate public scoping under NEPA and engage the citizens and elected officials of Montana in a meaningful environmental review of this project under a joint programmatic Environmental Impact Statement ("EIS"). Only then will the Department be in a position to make a well-informed decision on whether and under what circumstances to proceed with this project in a way that minimizes the environmental impact and maximizes the economic benefit to the State of Montana.

I. The Public Comment Period Should Be Extended.

As a preliminary comment, CFC requests that the public comment period deadline be extended for at least 60 days. The Department did not choose to engage the public in an early formal scoping process to define the scope of the environmental review

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**CLARK FORK COALITION – BARBARA HALL**

1. See response to Common Comment K.

2. The KMTP proposal is a permitting action, not an agency-initiated action. See responses to Common Comments A, B, and C2.

3. See response to Common Comment F1.



of this project. The KMTP EA was made available to the public on April 8, 2010 and the public comment period expires on May 14, 2010. A central tenet of MEPA is the opportunity for public participation so that the responsible agency can make an informed decision. See, *A Guide to the Montana Environmental Policy Act*, Legislative Environmental Policy Office (2009 rev). Public participation in the deliberations of government agencies is also a fundamental right enumerated in Montana's Constitution. Article II, section 9. Public involvement should therefore be an integral component of the environmental review for this project, not an afterthought.

The approximately 30 day comment period is insufficient for CFC to prepare and submit meaningful comments on the 327 pages of information (185 page EA and the 142-page associated Montana Transportation Plan). Further, CFC has submitted a Freedom of Information Act (FOIA) request to the United States Fish and Wildlife Service (USFWS) for information regarding USFWS consultation on this project and is attempting to gather information from other federal agencies with oversight of this project. We expect that the information we receive will influence our comments on the KMTP EA. Because it is likely that we will not receive the information before the current May 14, 2010 public comment period deadline, we respectfully request a 60-day extension of the comment period.

4 { Further, it has come to our attention that the email link to send public comments is not working and comments are being "bounced back" to their senders. This technical glitch has the potential to deter the submission of comments. The comment period must be extended to account for these technical deficiencies.

4. See response to Common Comment F2.

The level of public discourse and questions surrounding this project and the KMTP EA since it was made available to the public last month, clearly underscore the need for the public to thoroughly consider the information in order to make informed comments. As set forth in the Department's rules implementing MEPA, "[t]he level of analysis in an EA will vary with the complexity and seriousness of environmental issues associated with a proposed action. The level of public interest will also vary. The agency is responsible for adjusting public review to match these factors." Admin. R. Mont. 18.2.240. Because the Department chose not to initiate a formal public scoping process to define the scope of the KMTP EA early in the environmental review process, it would be reasonable, arguably required under MEPA, and well within the Department's discretion to extend the comment period to allow the public a meaningful opportunity to participate.

II. The Department Must Require Environmental Review under NEPA.

5 { Upon a very cursory review of the KMTP EA, the project appears to contemplate a limited state action. However, when considering the purpose and need of this project in conjunction with breadth of activities contemplated in developing this transportation corridor to facilitate Canadian tar sands development, it is clear the KMTP project constitutes a major federal action significantly affecting the quality of the human environment. 42 U.S.C. § 4332. The KMTP EA states that the project will need *at least* a Special Use Permit from the U.S. Forest Service ("USFS"), as well as an NPDES permit from the U.S. Environmental Protection Agency ("EPA"). *KMTP EA*, p. 3. Additionally, the EA states that permits under section 404 of the Clean Water Act, 33 U.S.C. 1251 *et seq.*, from the U.S. Army Corps of Engineers will likely be required. *KMTP EA*, p. 62. The federal agencies issuing these permits will need to engage in consultation with, and receive concurrence letters from, USFWS regarding possible impacts to species listed as threatened or endangered under the Endangered Species Act ("ESA"), as well as to Bald and Golden Eagle Protection Act listed species.

5. See response to Common Comment A.

6 { While the KMTP EA describes the project as simply a state project, a non-federal project is considered a "federal action" if it cannot "begin or continue without prior approval of a federal agency." *Maryland Conservation Council v. Gilchrist*, 808 F.2d 1039 (4<sup>th</sup> Cir. 1986) (citing *Biderman v. Morton*, 497 F.2d 1141, 1147 (2<sup>nd</sup> Cir. 1974)). The Kearsarge Module Transportation Project cannot move forward without the required EPA and USFS Permits. In addition, Imperial will need to determine whether any section 404 permits are needed from the U.S. Army Corps of Engineers, which must be issued before the project can begin.

6. See response to Common Comment A. There are no impacts to waters of the United States. A Clean Water Act Section 404 permit is not required for the proposed KMTP project.

Federal courts have addressed this issue on numerous occasions. For example, in *Maryland Conservation Council v. Gilchrist*, the Fourth Circuit considered a highway project funded solely by state highway funds that required a number of federal permits before the project could begin. The Court found that “because of the inevitability of the need for at least one federal approval, we think that the construction of the highway will constitute a major federal action.” 808 F.2d at 1042. The Court ruled that the state highway department could not simply construct the portions of the project not needing federal permits, and then apply for the permits, stating “[n]onfederal actors may not be permitted to evade NEPA by completing a project without an EIS and then presenting the responsible federal agency with a fait accompli.” *Id.* By finalizing this proposal and beginning construction without the required federal permits, the Department is engaging in exactly the type of activity the *Gilchrist* court was prohibiting. As such, the Department should engage the federal agencies now, and conduct a comprehensive NEPA review for this project.

7 { The required federal permits alone are enough to trigger a comprehensive environmental review under NEPA. However, there are additional elements of the project that further strengthen the need for NEPA review. This project is clearly tied to numerous actions involving the Port of Lewiston, Idaho where multiple federal actions are required for this project to move forward. *KMTP EA*, p. 1. The expansion of the Port of Lewiston and concomitant highway construction, both funded by the Federal Highway Department; along with the need to dredge the Port to maintain adequate depth for container ships to dock, conducted by the U.S. Army Corps of Engineers, all require significant federal involvement.

8 { Because the KMTP is connected to a series of other projects involving federal review and approval, the entire project should be reviewed in a single EIS. Following a number of legal battles over this very issue, the Council on Environmental Quality (“CEQ”) issued regulations interpreting NEPA that required “connected actions” to be considered together in a single EIS. 40 C.F.R. § 1508.25(a)(1). “Connected actions” are defined as actions that “cannot or will not proceed unless other actions are taken previously or simultaneously [or] are independent parts of a larger action and depend on the larger action for their justification.” *Id.* The KMTP and the Port projects are connected actions that require a single EIS. 23 C.F.R. § 771.111(f). Federal Highway Administration regulations support this position. Expansion of the turnouts and modification to utility lines under the KMTP have no “independent utility,” within the meaning of the regulations, beyond that which is connected to the Port of Lewiston projects, and therefore the NEPA review for both projects should be conducted together. *Id.*

9 { There are practical reasons for considering all the environmental effects of this project in one document. A number of serious direct, indirect and cumulative impacts associated with this project, and the related or connected projects, will not be considered without a holistic review of the potential effects. For example, creating a transportation corridor from the Port of Lewiston through Montana will require constant maintenance dredging of the Port. In recent years, as shipping to the Port has decreased, a number of stakeholders have advocated that the Port be abandoned and the Lower Granite dam, used to maintain reservoir levels required for access to the Port, be removed to improve fish passage and habitat for ESA-listed salmonids. *See e.g. Stuck in the Mud, Save Our Wild Salmon*, <[http://www.wildsalmon.org/index.php?option=com\\_content&view=article&id=114&Itemid=65](http://www.wildsalmon.org/index.php?option=com_content&view=article&id=114&Itemid=65)> (last accessed May 10, 2010). If the Port is to see increased traffic due to the establishment of this corridor, then the effects on these ESA-listed fish species must be considered.

10 { Another example is that a transportation corridor of this type and in this area will have adverse environmental impacts associated with increased use by heavy vehicles. For instance, heavy vehicles using the corridor to transport large loads will increase the amount of brake dust on the roadways. Recent studies have found that brake dust is toxic to a number of important fish species, such as ESA-listed salmonids and bull trout. *See e.g. Governor Signs Bills to Protect Citizen Health and Environment*, Washington Dept. of Ecology <<http://www.ecy.wa.gov/news/2010news/2010-049.html>> (last accessed May 10, 2010) (stating: “Copper in vehicle brake pad dust is toxic to aquatic life, including salmon”).

7. See response to Common Comment A.

8. The only portion of the project identified that needs federal approval is the minor amendment to an existing special use permit for the 10-mile plow area on the Lolo National Forest. That activity is helpful, but is not required to conduct the project and therefore is not a connected action. Missoula Electric Coop and the Forest Service have stated they planned to have this line buried before the KMTP was initiated.

9. See response to Common Comment E2.

10. MDT does not believe that the transport of 200 modules over the course of a year is a significant increase in traffic.

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|----|---|---|
| 11 | <p>Yet another example is that the limited scope of the KMTP EA fails to address cumulative impacts of this and related projects. Increasing motorized traffic and paved surfaces, along with the increased need to salt and maintain the roads to accommodate the transportation corridor all have environmental effects that need to be considered in light of other foreseeable federal and non-federal actions with similar potential for adverse effects. 40 C.F.R. § 1508.7.</p>  | 11. MDT does not anticipate additional salt usage on the roadway as a result of the KMTP project. There will be additional paving as a result of the new or modified turnouts. However, the impact of the additional surface area is negligible in terms of additional runoff. Best management practices will be conducted as necessary. Therefore, MDT concludes the KMTP project would not contribute to water quality impacts. |
| 12 | <p>Transporting this equipment to Alberta through the United States crosses three state lines and two international boundaries. Facilitating the movement of equipment requires the involvement of a number of state and federal government agencies, multiple county and city governments, and the Nez Perce and Blackfeet nations. The transportation of this equipment facilitates tar sands oil production, which generates almost triple the global warming pollution as conventional oil production because of the massive amounts of energy needed to extract, upgrade, and refine the oil. In Montana, many of the identified harms of global warming are being felt. Ignoring the ultimate destination and utility of this equipment is counter to the spirit of NEPA which charges federal agencies to “recognize the worldwide and long-range character of environmental problems” in order to prevent a “decline in the quality of mankind’s world environment.” 42 USC § 4332(F). Therefore, all aspects of this project, from the entry of ships into U.S. territorial waters, to the use of equipment in Alberta’s tar sands mines, should be considered in the environmental review of this project under NEPA.</p> | 12. See the responses to Common Comments A and P.   |
| 13 | <p>III. <u>The Department Must Require a Programmatic Environmental Review of the Impacts of the Proposed Action.</u></p> <p>Notwithstanding the above arguments that the Department must require an environmental review for this project under NEPA, if the Department were to continue to only apply MEPA to this project, CFC believes that at the very least, a programmatic environmental review must be conducted through an EIS. Programmatic environmental reviews under MEPA are appropriate “whenever the agency is contemplating a series of agency-initiated actions, programs, or policies which in part or in total may constitute a major state action significantly affecting the human environment,” and “whenever a series of actions under the jurisdiction of the agency warrant such an analysis as determined by the agency, or whenever prepared as a joint effort with a federal agency requiring a programmatic review.” Admin. R. Mont. 18.2.251.</p>  | 13. See responses to Common Comments B and C2.  |
| 14 | <p>As stated in the KMTP EA, the purpose of the project is “for Imperial Oil to improve Montana infrastructure to facilitate a safe and efficient movement of over-dimension loads through Montana to the Canadian border and return trailers through Montana to the Idaho border.” <i>KMTP EA</i>, p. 1. The issuance of “[f]uture 32-J permit loads using any portion of the proposed route similar to this project” was listed in the KMTP EA as a “Present and Reasonably Foreseeable” activity that should be considered in the cumulative impacts analysis for the project. <i>KMTP EA</i>, p. 16. In addition, the KMTP EA states, “the Department believes it is reasonably foreseeable that additional oversized loads would want to use the route . . .” <i>KMTP EA</i>, p. 24.</p>   | 14. See response to Common Comment K.   |
| 15 | <p>MEPA and its implementing regulations require the agency to examine the direct, secondary and cumulative impacts of a proposal. Cumulative impact analysis includes a review of all state and non-state activities that have occurred, are occurring, or may occur that have impacted or may impact the same resources as the proposed action.</p>   | 15. The cumulative effects were analyzed based on activities as defined in 75-1-200(3), MCA. Those activities are described in Section 3.2.of the EA.   |
| 16 | <p>Unfortunately, the potential cumulative impacts from permitting future high and wide loads were not even addressed in the KMTP EA, presumably because of the assertion that “[t]hese types of loads would be governed under the same applicable regulations and laws as the proposed KMTP.” <i>KMTP EA</i>, p. 16. Once the road and utility modifications are in place, however, it is doubtful that the Department will elevate the environmental review for the issuance of 32-J permits for similar high and wide loads to even the cursory environmental assessment that has been required of Imperial for this project. Some of the potential cumulative impacts that were not considered include the premature deterioration of highway infrastructure such as bridges and road surfaces due to repeated use of the facilities to move loads in excess of the design specifications of the facilities, and increased administrative expenditures to amend</p>   | 16. See response to Common Comment K and L.   |

maintenance, oversight, and snow removal schedules to accommodate each future use of the corridor. The cumulative impacts analysis therefore falls short of what is required under MEPA.

17 { Until recently, the Department did not hesitate in calling this project what it is: the creation of a permanent high and wide corridor through western Montana. Less than one year ago, in July 2009, Director Lynch painted a more accurate picture of the project for state legislators on the Revenue and Transportation Interim Committee. (Information from July 1, 2009 committee meeting accessed at [http://leg.mt.gov/css/Committees/interim/2009\\_2010/Revenue\\_and\\_Transportation/Meeting\\_Documents/meetings.asp#july09](http://leg.mt.gov/css/Committees/interim/2009_2010/Revenue_and_Transportation/Meeting_Documents/meetings.asp#july09) (last access May 12, 2010).) Director Lynch explained at that meeting, that this project will be "setting the stage for high/wide corridor in Montana for things we haven't even imagined yet." (Rev. and Transportation Committee Meeting, July 1, 2009 at minute 30:00.) Throughout the presentation, Mr. Lynch emphasized his many concerns with the proposal including the fact that due to the nature of the route, there are no alternatives to this corridor for travelers to avoid these big rigs, the size of the turnouts, and the potential for a "significant impact to the state." Clearly, the Department is aware that the purpose of this project and its impacts extend far beyond the Imperial proposal considered in the KMTP EA.

18 { The Department has recently taken the position that what it knows about the project now is different than what it knew a year ago, namely that a permanent corridor is not even being contemplated. An exercise in semantics, however, is insufficient to obviate the requirement under MEPA that a programmatic EIS must be prepared to adequately assess this project as a whole. Further, despite public statements to the contrary, the Department is not restricted to information submitted by Imperial in its determination of the scope, purpose and need, alternatives and environmental impacts of this project. The Department's consideration of the project is not limited to what appears in the four corners of the application. It cannot turn a blind eye to the fact that this corridor, if developed to accommodate oversize load transport between the Port of Lewiston and Alberta, will be used by other entities for the same purpose. This conclusion is supported by public statements (easily obtained using a simple Google search) from various entities associated with this project.<sup>1</sup>

Through a programmatic environmental review process, the Department would be better able to consider the cumulative environmental impacts of the long-term use of this corridor for high and wide shipments. While a programmatic environmental review is being developed, the Department is prohibited from taking actions that would "prejudice the ultimate decision on the program if it tends to determine subsequent development or foreclose reasonable alternatives." Admin. R. Mont. 18.2.251(6).

Approval of this project, without development of a programmatic environmental review document, would set the course for subsequent use and development of this corridor and foreclose consideration of reasonable alternatives in the absence of consideration of the cumulative environmental impacts of this project.

<sup>1</sup> See, e.g., the following excerpts from various public websites. "We have some new opportunities now with oversize cargo from three different areas – The Port of Lewiston could be called on to move heavy cargo to the oil sands area in Alberta Canada the second largest oil reserve in the world right now. Also Wind turbines built overseas destined for the mid-west, and also coal equipment destined for Wyoming. A lot of this equipment is manufactured in China or South Korea. Because of the trucking laws it's almost impossible to get these trucked across Washington so they're looking at the Port as a way to get this cargo to the interior of the mid-west. This cuts a significant mileage off the movement of cargo. The Port has talked to Shell, Exxon and Conoco and several large oil companies about moving this equipment though here." Port of Lewiston at Crossroads, May 23, 2009 (<http://idahofarmbureau.blogspot.com/2009/05/port-of-lewiston-at-crossroads.html>); "Utilizing this route as a viable alternative has only been recently 'discovered' by logistics companies representing companies who have oversize equipment destined for the interiors of Canada and the U.S. Midwest." (<http://www.portoflewiston.com/SColumbia.html>); "Last summer the port played a key role in the shipment of large pressure vessel to Fort McMurray in the Alberta oil sands via the Columbia/Snake River system. Korean equipment manufacturers had been looking for an efficient route to get their machinery to Canada. They found that they could bring the equipment to the Port of Vancouver, U.S., then up river to Lewiston (435 miles) and lastly by land through Montana and up to Alberta. The route cuts 5,300 nautical miles plus 1,400 road miles off the traditional route." ([http://www.washingtonports.org/member\\_resources/publications/Lletters/march09.htm](http://www.washingtonports.org/member_resources/publications/Lletters/march09.htm)).

17. The comments by Director Lynch were not made in the context of any proposal, programmatic or otherwise, and therefore are not an appropriate basis to expand the scope of the EA. To do so would be speculation about future activities that have not yet been proposed by MDT or any other state agency.

18. See response to Common Comment C2.

IV. The KMTP EA Fails to Include Required MEPA Alternatives.

The proposed action is described in detail in Section 2.1 of the KMTP EA. A “no action” alternative is addressed in one paragraph, and each of four alternatives is summarily addressed in the four paragraphs of Section 2.3 of the KMTP EA. The rejected alternatives include four Canadian routes and one U.S. Interstate route. The KMTP EA describes impassable barriers encountered along each of these routes, but while 9 pages of the KMTP EA are dedicated to a detailed description of extensive construction measures necessary to make the proposed new Montana route passable, there is no discussion of whether construction could be undertaken to bypass the supposed barriers on any of the alternative routes described.

Under NEPA, agencies are required to analyze a “reasonable range of alternatives,” which is evaluated in light of the purpose and need for the agency action. *See, Native Ecosystems Council v. U.S. Forest Service*, 428 F.3d 1233, 1246-47 (9<sup>th</sup> Cir. 2005). Alternatives should be identified that would “avoid or minimize” the adverse environmental effects of the proposed action. 40 C.F.R. § 1500.2(e). MEPA alternatives analyses are reviewed under the same standards that federal courts apply to NEPA analyses. *See, Montana Wilderness Assoc. v. Bd. of Natural Res. and Conservation*, 200 Mont. 11, 24 648 P.2d 734, 741-42 (1982).

Pursuant to MEPA, the Department is required to prepare a “description and analysis of reasonable alternatives to a proposed action whenever alternatives are reasonably available and prudent to consider and a discussion of how the alternative would be implemented.” Admin. R. Mont. 18.2.239(3)(f). The Department is constrained to consider alternatives that would “appreciably accomplish the same objectives or results as the proposed action” and these alternatives must be “realistic and technologically available.” Admin. R. Mont. 18.2.239(3)(f).

From the summary treatment of the alternatives discussed in the KMTP EA, it is impossible to determine whether any of these constitute a “realistic or technologically available” alternative. Each of the alternatives was dismissed due to impassable barriers without an associated discussion of the estimated cost to surmount the barriers. If there had been some comparative discussion of the cost of implementing construction measures to bypass restrictions on any of these alternate routes, it might be possible to compare alternatives as required by MEPA.

Further, the KMTP EA did not even consider the most obvious alternative that would meet the stated purpose and need of the project to ship equipment through Montana. The document fails to mention that high and wide loads are regularly shipped from the Port of Houston, Texas, through Billings, Montana to Alberta. The existence of this so-called “traditional route” was not even acknowledged in the KMTP EA.

V. The KMTP EA Fails to Employ the Best Available Science in Analyzing Impacts to Water Resources.

Underlying the entirety of the environmental impacts section of the KMTP EA (Section 3.0) is the premise that because “all of the proposed activities (construction and transportation) on highways in Montana would occur within the existing right-of-ways;” there will be no environmental impact. We fail to see the scientific basis or logic in this assertion, especially when considering the potential impact of this project on water resources adjacent to the proposed corridor.

Regarding water resources, the KMTP EA states, “no additional effect on water is expected from turnouts and road modifications than is already occurring from the highways and adjacent land uses.” *KMTP EA*, p. 40. It is clear, however, that turnout construction will add additional paved area closer to streams than the current condition. The presented rationale of maintaining a 100-foot buffer from turnout construction to the stream will likely not prevent waterways from increased sedimentation, particularly where slopes are steep and/or vegetative cover is lacking.

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19. MDT has not identified significant adverse impacts from the KMTP project. See responses to Common Comments D1 and D2.

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20. See responses to Common Comment O and I.

Best Management Practices (“BMPs”) listed in Appendix D of the KMTP EA inadequately address prevention of potential sedimentation impacts. The Ninth Circuit has found that reliance on Best Management Practices without more project-specific analysis to be faulty under NEPA. *See, Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1214 (9th Cir. 1998) (holding reliance on BMPs was not a “hard look” where the USFS did not account for the different soil conditions between previous sites on which BMPs were successful in preventing erosion and the sites at issue.) Simply stating that impacts to water resources will not occur and that BMP’s will be used does not satisfy the “hard look” requirement.

Other specific comments include:

- 21 { • There is no analysis in the KMTP EA of the potential impacts to water resources from the increased need for sanding and/or de-icing that will likely be required in winter months, especially on turnouts.
- 22 { • The modification of drainage patterns on the roadways and adjacent lands has the potential to result in increased sedimentation or pollution to streams adjacent to construction activities. *KMTP EA*, p. 40. The KMTP EA states, “[c]onstruction of several turnouts will modify drainage from the road or adjacent lands; however, existing drainage patterns will be maintained or improved if necessary.” *Id.* This statement is unclear and further information should be provided to adequately determine whether a potential to impact to water resources will occur that may require both state and federal permitting.
- 23 { • In Table 25, the miles covered within the floodplains should be listed, not just the number of crossings. The KMTP EA states “[f]loodplains would not be affected by turnout construction or road modification because none of these activities are located in floodplains.” *KMTP EA*, p. 40. This statement should be substantiated with a map of proposed turnouts and floodplain boundaries. Given that floodplain maps are notoriously inaccurate, these plans should be reviewed by each county’s floodplain administrator, and additional survey work performed where necessary.
- 24 { • The KMTP EA addresses spill response to routine fuel/hydraulic fluid/antifreeze leaks. *KMTP EA*, p. 42. However it does not adequately address contingencies for the possibility of a large-magnitude event, such as a truck sliding or overturning near or into a waterway. More analysis is required to determine how much fuel/hydraulic fluid/antifreeze could be spilled, and a specific contingency plan for this event should be developed.
- 25 { • The assessment in the KMTP EA of potential effects to wetlands does not meet the requirements of the Clean Water Act or the requirements of the Executive or U.S. Department of Transportation Order for Protection of Wetlands. No functional assessment of wetlands has been done. A broad statement is made that site locations “will be adjusted or mitigation applied to avoid impacts on wetlands if necessary.” *KMTP EA*, p. 39. This assessment is completely insufficient and does not meet the requirements of the FHWA Technical Advisory, the Protection of Wetlands Executive Order or the Clean Water Act. Full survey and delineation of wetlands, including functional assessment needs to be completed. Then an analysis of direct and indirect impacts to wetlands needs to be conducted.

VI. The KMTP EA Fails to Sufficiently Address the Potential Impact of the Project on ESA-Listed Species.

There are several ESA-listed species and designated critical habitat in the proposed corridor. Of particular concern are potential impacts to bull trout, a threatened species under the ESA, bull trout critical habitat, and grizzly bears, a threatened species under the ESA. The KMTP EA states that “this project does not include any federal funds, therefore consultation with the USFWS is not required.” *KMTP EA*, p. 44. This statement is inaccurate. Section 7(a)(2) of the Endangered Species Act requires federal agencies to ensure that actions they fund, authorize, or carry out are not likely to jeopardize the continued existence of the species or destroy or

- 21. No additional sanding and/or de-icing is needed, including on turnouts.
- 22. All turnouts will have sediment control and be monitored per the SWPPP. Agencies with jurisdiction have been consulted regarding the KMTP and have not identified any significant adverse impacts.
- 23. Section 3.9 of the EA discusses the method of determining floodplain impacts.
- 24. See responses to Common Comments H1 and H2.
- 25. See response to Common Comment I.

26 { adversely modify critical habitat. Although it is unclear from the KMTP EA exactly what federal permits will be required for this project and for what activities, it appears that at the very least a permit from the U.S. Army Corps of Engineers will be required under section 404 of the Clean Water Act as well as one or more Special Use Permits from the U.S. Forest Service and an NPDES permit from the U.S. Environmental Protection Agency.

The issuance of these permits is a federal nexus that requires consultation with the USFWS under Section 7 of the ESA. Even though the KMTP EA acknowledges that informal consultation was had with USFWS regarding grizzly bears (KMTP EA, p. 62), there is no discussion of bull trout consultation. Further, the KMTP EA states that this project "may affect but not likely to adversely affect" grizzly bears. To adequately determine whether the mitigation measures set forth in Appendix E of the KMTP EA will prevent impact to grizzly bears, it is necessary to review USFWS concurrence letters and/or biological opinions that have been prepared for this project, which so far have not been made available to the public.

VII. The KMTP EA Fails to Accurately Analyze the Economic and Community Impacts of the Proposed Project.

The economic impacts analysis provided in Section 3.6 of the KMTP EA is insufficient on many fronts. See, *Economic analysis of big rigs misses hidden cost*, Steve Seninger, Ph.D., Guest Column, *Missoulian* (May 6, 2010). The analysis is clearly lacking in any substantive discussion on any potential for economic loss that could result from the project. Specifically we have the following comments on Section 3.6:

- 27 {
- The population discussion downplays the fact that the City of Missoula and surrounding communities make up the largest urban area in the State of Montana.
  - There is no calculation of the time-value of vehicles being forced to wait during turnout construction and road modification, which will occur during daylight hours.
  - Any impact on Ravalli County is omitted from potential economic impacts of the project. Non-commercial and commercial users based in Ravalli County use portions of the route on a daily basis during both daylight and night time hours.
  - There is no accounting for costs of road and bridge deterioration that would result from this project.
  - Given there is no requirement for Imperial to employ Montana workers, the discussion regarding job creation and income subject to Montana state income tax is questionable, and unable to be substantiated.
  - There is no analysis of the potential financial hit to Montana's tourist industry from this project and future transportation projects along this route.
  - There is no accounting of the costs of potential accidents that may occur during or related to the project.
  - There is no accurate accounting of taxpayer resources that have already been expended on this project and that are expected to be spent in the future surrounding the Department's analysis of the project which has been ongoing for at least two years and which will continue well into the foreseeable future.

Thank you for considering our comments. For all of the reasons stated above, we urge the Department take a much closer look at this project and require a true and honest accounting of the associated environmental impacts.

Sincerely,

*Barbara C Hall*

26. The KMTP is not a federal project. That said, the effects on listed species and their critical habitat was evaluated and the determinations stated in the EA. Discussions were held with USFWS when the evaluation of effects was made. Because formal consultation was not required, the USFWS did not prepare concurrence letters or a biological opinion.

27. See responses to Common Comment M and Common Comment L.

Barbara C. Hall  
Legal Director



To Whom It should Concern,

It is well past time to consider the effect of today’s actions on tomorrow’s well-being.

The Kearl Module Transport Project is incredibly ill-advised.

Apart from the fact that burning fossil fuels will ravage the planet through climate change and apart from the fact that oil from Tar Sands is multiple times worse than conventionally drilled oil, the Transport Project will be devastating for DECADES to the environment of Montana and Idaho.

- 1 { The MDT must take a much closer look at this project by requiring an Environmental Impact Statement on the creation of this industrial corridor in Montana. We also want to see coordination with the federal permitting entities involved in this project through the NEPA process. The EIS must:
- 2 {
  - Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 3 {
  - Require real alternatives to be considered;
- 4 {
  - Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 5 {
  - Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts
- 6 {
  - Identify the impact on Montana's disappearing glaciers caused by:
    - GHG releases from the fuel use within the corridor for this project, each year
    - GHG releases from the increased extraction of oil from Tar Sands, enabled by this project

Sincerely,  
Dane Cobble

**COBBLE, DANE**

Form Letter 1

1. See response to Common Comment B and Common Comment A.
2. See response to Common Comment C2.
3. See response to Common Comment D1 and response to Common Comment D2.
4. See response to Common Comment M.
5. See responses to Common Comment A.
6. See response to Common Comment P.

Dear Montana Department of Transportation,

1 { I am very concerned about the proposed high and wide corridor that will have negative  
 impacts to our stunning rivers. First of all, if this machine is so big that roads need to be modified  
 to move it, it shouldn't be moved. I am concerned about the impacts of this behemoth of a  
 2 { machine on our fragile riparian ecosystems. The mass alone seems enough to compromise the  
 roads it will be traveling on, even if it is months after it is delivered. Even as an informed citizen  
 and environmental studies student at the University of Montana, I was surprised by the short  
 3 { comment period given for such a huge proposal. A project of this size needs a comprehensive  
 environmental impact statement, not just an EA. An analysis of the economic impacts of this  
 proposal on our recreation and tourism industry needs to be fully considered. This horrible idea  
 should be analyzed under the DEQ and NEPA due to the potential environmental impacts to our  
 4 { Wild and Scenic corridors and our communities. Thanks for your time.

Sincerely,  
 Patrick Colleran

1127 Jackson Street  
 Missoula, Mt 59802

**COLLERAN, PATRICK**

1. The turnouts are to accommodate the 10 minute rule, not the module trailers. See responses to Common Comments K and O.
2. See responses to Common Comments I and L.
3. See response to Common Comment B and M.
4. See response to Common Comment A.

1 { Don't allow it.

Kevin Colussi  
 890 S Hoback  
 Helena, MT 59601

**COLUSSI, KEVIN**

1. Comment noted.



CAJA<sup>3</sup> Community Action for Justice in the Americas, Africa, Asia

P.O. Box 9274, Missoula, MT 59807-9274

**COMMUNITY ACTION FOR JUSTICE IN THE AMERICAS, AFRICA, ASIA**

May 13, 2010

Montana Department of Transportation

MDT Environmental services Bureau

PO Box 201001

Helena, MT 59620-1001

Comments re: the Kearsarge Module Transport Project (KMTP) EA Control Number: CN 6800

Please accept our comments:

Climate change science and justice. It is unconscionable for Montana to even indirectly contribute to such dirty technology when the impacts of climate change are clear. **Alternatives** need to be utilized and developed rather than ignored since life on the planet is threatened. Indigenous people— First Nations people of Fort Chipewyan in Alberta, Canada are already suffering from record rates of cancer and other ailments from pollution of the Athabasca River from the Alberta Tar Sands. The TAR Sands of Alberta are already causing such a huge negative impact on rivers, boreal forests, air, etc—irreparable harm to life on the planet, does not provide clean energy and uses more energy than produced.

1

2

3

- Our streams, wetlands and riparian zones will be subject to damage from such heavy road use (weight and size of vehicles) next to our rivers.
- Our recreational opportunities on the scenic rivers and byways are critical to our way of life. Any project with potential damages to these should not be allowed as it does not benefit Montanans as a whole.

1. See responses to Common Comments E1 and P.
2. See responses to Common Comments I and O.
3. See responses to Common Comments M and N.

We are also concerned at the impact of the additional roadwork on Lolo Creek, along highway

4 { 12. This creek has been listed by the State of Montana TMDL program for sediments. Additional turn-offs on this narrow road in a narrow valley will certainly contribute additional sediment to an already compromised stream channel. The result of excess sedimentation will be altered stream morphology, increased incisement and altered stream flows, which are already having detrimental impacts to stream banks and stream bank property, not to mention ecologic integrity.

5 { We ask that the 32-J permit be denied as it is inadequate. At the minimum please submit to a federal Environmental Impact Statement to take into full account all the damages that Tar Sands mining generates. Common sense dictates an EIS when such a request requires higher scrutiny.

Thank you for your consideration.

P. Marques, R Jankowska-Bradley, C Bradley

CAJA<sup>3</sup> Leadership Team

submitted for team by R Jankowska-Bradley ( rjankowska@montana.com)

The wildlife will in turn be impacted.

Dear MT Dept. of Transportation:

I am strongly opposed to the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. The potential risks to both our rivers and other travelers on those roads are unacceptable. It is clear that the impact on these proposed industrial route will increase over time as the development of the Alberta Oil Tar Sands expands to meet future demand. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

I appreciate you reviewing my comments.

Sincerely,

4. See response to Common Comment O.

5. See response to Common Comments A, B, and E1.

**COONEY, JOHN**

Form Letter 1

1. See response to Common Comment C2.

2. See responses to Common Comments D1 and D2.

3. See response to Common Comment M.

4. See responses to Common Comment A.

John Cooney  
 514 N. 9th Ave  
 Bozeman, MT 59715  
 406-580-7966

**COONEY, TED**

To Montana Department of Transportation,

1 { I think that allowing the proposed Tar Sands equipment hauling program to  
 proceed is a very bad idea. Who is to say what they will want to haul  
 next, and for how long? This should have been handled in Canada. If the  
 2 { loads are too large to drag over the Canadian Rockies, then they will have  
 to be adjusted - their problem. This program will very negatively affect  
 Glacier Park visitations not to mention the local rural traffic that will  
 be inconvenienced for who knows how long. Just say NO!!  
 Ted Cooney

1. See response to Common Comment K.
2. The minimal disruption in traffic would not affect Glacier Park visitation. See response to Common Comment G.

I say NO to this project for various reasons. Here are just a few of them.

**COPELAND, JEANETTE**

- 1 { 1. The "jobs" created by this project are most likely one-time only..the construction of  
 the turnouts.
- 2 { 2. The negative impact on Montana's natural beauty, open spaces, wildlife, streams,  
 etc.
- 3 { 3. The negative impact on Montana's tourism industry.
- 4 { 4. The real probability that this project will "open the door" to more "big rig" projects.
- 5 { 5. The real probability that Montana taxpayers will "foot the bill" through road  
 maintenance taxes.

1. Comment noted.
2. See response to Common Comment J.
3. See response to Common Comment M.
4. See response to Common Comment K.
5. See response to Common Comment L.

Please read the Guest Column in the Missoulian dated Thursday, May 6, 2010 written by Steve Seninger, an economist. His comments on the hidden costs associated with this project and its negative impact on the Montana economy make a lot of sense.

With the oil rig explosion and spill in the Gulf still fresh in everyone's minds, anything to do with oil is leaving a bad taste in one's mouth!

Jeanette Copeland  
[jeanette@bigsky.net](mailto:jeanette@bigsky.net)

Dear MDT Staff,

I attended the Missoula public hearing for this proposed project on April 29th and asked Director Jim Lynch why an EIS was not prepared for such a large-scale unprecedented project such as this, especially considering that 53 new hwy pull-outs over 300' long will be constructed along two of our most scenic and recreational use driven river corridors. The gist of his answer seemed to be that an EA was sufficient because MDT was not having to acquire any new right-of-way, i.e. the project could be contained within the existing hwy right-of-ways. However, whether the land belongs to MDT, USFS, DNRC, FWP, the tribes, or private property owners does not matter in regards to the environmental impacts, only social impacts. I am concerned that the EA lacks a thorough review of the environmental impacts, both to the corridors in MT and the larger issue of the additional impacts to MT from the added greenhouse gases released from the end use of these behemoth "modules." After reading and hearing more information about the project, I believe the only way that it can properly be reviewed is by a complete EIS of the entire route from Idaho to the northern MT border, especially the whole Hwy 12 corridor since it is so narrow and close to the river.

The EIS should also address the likelihood of this investment of 53 new pull-outs and buried utilities etc. will have on future requests for massive equipment to be shipped via this route. Because Hwy 12 & 200 are such important scenic corridors for recreation, there should be a more thorough analysis of how this project and future requests that are likely to occur will have on the recreational use and wildlife.

Sincerely,

Jacquelyn Corday

Missoula, MT

The permits to allow Imperial Oil to utilize Montana's highways for loads of unprecedented size go far beyond simply allowing passage.

Granting the permits will mean large scale construction on public right of way. This requires a full EIS analysis before a single rock can be moved and any strip of asphalt is laid down. I believe the law is very clear on this matter, regardless of who is footing the bill.

Thank you,

Benjamin Courteau

Benjamin Paul Courteau

1105 College St

Stevensville, MT 59870

[Benjamin.courteau@gmail.com](mailto:Benjamin.courteau@gmail.com)

406-381-2308

**CORDAY, JACQUELYN**

1. See response to Common Comment P.
2. See responses to Common Comments B and E2.
3. See response to Common Comment K.

**COURTEAU, BENJAMIN**

1. See response to Common Comment B.

1 { Please be advised that I am against the plan to move heavy equipment through Montana and Missoula in particular to the Canadian oil fields.  
Phil Cousineau

**COUSINEAU, PHIL**

1. Comment noted.

May, 14, 2010

Jerry Covault  
7850 Stegner Dr  
Missoula , Montana 59808

**COVAULT, JERRY**

Montana Department of Transportation

Kearl Module Transport Project

Dear Official,

1 { Allowing a highway transportation system capable of handling huge loads between the Lewiston seaport and Interstate 90 at Missoula and on to Canada will irreversibly change the landscape environment,, scenic character and health of the Lochsas River, Lolo Creek, the Bitterroot River and the Blackfoot River.

1. See responses to Common Comments J and O.

2 { It will change the economy of the Missoula community, some will benefit others will not, but the economy will be irreversibly changed.

2. See response to Common Comment M.

3 { Finally such a project will irreversibly and adversely impact the social, cultural and environmental values that many thousands of western Montana residents hold. In fact, it will adversely affect the very reasons many of us choose to live here.

3. Comment noted.

Irreversible decisions must only be made with the greatest and wisest amount of consideration. Few decisions have effects that effect all three elements of people living in a place, the environment, the economy and human values. This decision affects all three elements. The adverse impacts are too great to allow this to happen for the short term goals of half of \$30-some millions of dollars coming to our state.

The decision must favor the people and the environment, decide to deny this proposal.

Sincerely,  
Jerry Covault

I am writing to comment on the Kearsarge Module Transportation Project Environmental Assessment. I find this Environmental Assessment insufficient and am opposed to this plan. I urge the Montana Department of Transportation to deny this proposal.

1 { Furthermore, I request that the public comment period deadline be extended for at least 60 days. The 30-day comment period MDT set up for this proposal is not long enough and many Montanans are unaware that his plan is even in the works, It is difficult enough for citizens to stay informed or to research what such a proposal could mean to our state and to our environment. Anything less than a 90-days comment period is unacceptable. Our state Constitution states that the public has a right to participate in the deliberations of government agencies and the 30-day public comment period MDT has afforded us does not meet the spirit of that requirement. Please extend the comment period another 60 days.

2 { I found the Kearsarge Module Transportation Project Environmental Assessment (KMTP EA) lacking in several critical areas. I believe a much more thorough Environmental Impact Assessment must be done.

3 { First of all, the KMTP EA assess the impacts of this plan for only the first year. This will be a permanent industrial transportation corridor, yet this the EA makes no mention of that nor does it make any assessment of the effects of that permanency. The permanent industrial transportation corridor must be analyzed. Until that is done, neither the Montana Department of Transportation nor the citizens of Montana can possibly make an informed determination about the impact of this proposal.

4 { Second, this proposal involves several states and two international borders as well as National Historical Landmarks and Designated Scenic Byways, and crosses wetlands, flood plains and habitats of endangered and threatened species. And yet the MDT KMTP EA focuses only on the narrow corridor through Montana without considering any cumulative effects across the broad region. The KMTP EA states that several federal permits will be needed, but has attempted to involve those federal agencies only in an informal way. It is obvious that a project that crosses such a broad region should require a federal analysis through the National Environmental Policy Act to fully analyzed its cumulative impacts.

5 { Third, some of the environmental analysis is questionable. For example, there was no scientific assessment of wetlands done for the KMTP EA. It states that site locations "will be adjusted or mitigation applied to avoid impacts on wetlands if necessary." That is not an assessment and is totally inadequate in meeting the requirements of the Clean Water Act. It also does not meet the requirements of the U.S. Department of Transportation Order for Protection of Wetlands.

6 { Assessment of impact to rivers and fish, especially the ESA threatened species bull trout, is also inadequate. While there is some assessment attempted in this area, analysis of increased brake dust wasn't considered, even though brake dust is known to be toxic to fish species. The increased runoff of salt and/or sand used to maintain safety on the roads wasn't fully accounted for nor was the impact resulting from the increased amount of paved surfaces.

**COX, BECKY**

1. See response to Common Comment F1.
2. See response to Common Comment B.
3. See responses to Common Comments C2 and K.
4. See response to Common Comment A.
5. See response to Common Comment I.
6. See responses to Common Comments I and O. MDT does not anticipate increased salt or sand usage on the roadway. MDT does not believe the transport of 200 modules over the course of a year significantly increases traffic.



Much of the determination that endangered or threatened species will not be affected by the construction and use of this industrial transportation corridor is based on two premises.

7 { One, accidents will not happen or will be small and two, this route will be used for two loads a day for one year. The KMTP EA should have considered the possibility of a major accident such as a truck or load overturning into a river and evaluated specific plans to address the accident. It should also evaluate the cost to restore the area from any damage caused. Once established, this transportation corridor will be used for years to come and will see far more traffic than two loads a day for only one year. It is unrealistic to plan that no accidents will happen. It is also inadequate to evaluate what impacts this road will have on endangered or threatened species based on one year's use when it is known that this road will be used far beyond one year. Any conclusions presented in the EA are incomplete and adherence to these two premises render the analysis inadequate.

8 { Fourth, the KMTP EA does not assess the impacts to Montana communities along the route. Many Montanans have chosen to live here because of the character of their communities and that character will be forever changed by the industrialization of streets and road through their towns.

9 { Fifth, the KMTP EA does not assess the impacts to the economies of Montana communities along the route. There is mention in the EA that jobs will be created and income produced that will be subject to Montana state income tax, but it should be noted that there is no requirement to employ Montana workers, so at best this should be included in the KMTP EA only as an unsubstantiated theory. Tourism is a major economy in Montana and it depends on an appealing landscape, fresh waters, abundant wildlife and peace and tranquility. An industrialized transportation corridor with slow-moving, over-sized and noisy tractor trailers seemingly would threaten that concept. Many Montana communities are dependent on that concept. There is also the long-term financial burden to residents of Montana for the cost of deterioration to roads and bridges, as well as maintenance that the KMTP EA doesn't account for. These economic hardships must be analyzed and account for, both during the construction phase and long-term.

10 { Sixth, this route follows a portion of the historical Lewis and Clark Trail and a large portion of the route is currently designated as a National Scenic Byway. The Lolo Trail and Lolo Pass are National Historic Landmarks. Industrializing the Lewis and Clark Trail, the Lolo Trail, Lolo Pass and a National Scenic Highway with a super-wide road carrying two-story high and 330,000 pound loads is incompatible with these designations. These irreplaceable assets for our state and are important to our sense of place.

11 { Seventh, it appears that Montana is being sacrificed so that Exxon can ship mining equipment to the tar sands industry in Canada. Why aren't Montanans being given more of a chance to weigh in on this plan? The deadline for comments must be extended.

7. See response to Common Comments H2 and K.

8. Communities would not be significantly impacted, as described in Section 3.5 and 3.6 of the EA.

9. See responses to Common Comments Q and M.

10. See response to Common Comment L.

11. See response to Common Comment N.

12. See response to Common Comment F1.

13 { Eight, this transportation corridor is being developed so that Exxon can move equipment to the tar sands in Canada. This industry generates three times the amount of global warming pollution as conventional fuel production. The KMTP EA should, but did not, analyze what additional impacts that increased pollution will have on Montana.

13. See response to Common Comment P.

14 { Ninth, the MDT KMTP EA did not fully considered alternative. The section on alternatives was very short and provided very little analysis. It did mention costly roadblocks to the alternatives but did not address them or compare them to the costly construction of the proposed route. It also did not mention the already established route through the Port of Billings.

14. See response to Common Comment D1.

In conclusion, I am asking that the Montana Department of Transportation:

- Deny this proposal
- Consider the cumulative impacts across the region for more than one year
- Apply scientific methods to the analysis of impact on wetlands and waterways
- Seek a comprehensive federal analysis through the National Environmental Policy Act
- Fully analyze alternative routes
- Extend the public comment period another 60 days (see Montana Constitution (Article II, section 9)).

Thank you for considering my comments.

Becky Cox  
 1509 Howell Street  
 Missoula, MT 59802

April 28,2010

To Whom This May Concern:

I have been a resident of Montana three times in my 62 years. I now live in Minnesota, yet I hold a deep personal sense of place in my heart and mind for the state where I lived, worked and raised my family. In my cumulative 24 years living in Montana I do not believe there was ever a project of the scope of the KMTP that would have been approved via a simple Environmental Assessment of the impacts of an undertaking of this scale or with the potential to harm the human environment.

**CRETE, RON**

- |   |   |  |   |
|---|---|--|---|
| 1 | { | First, I am concerned that Federal Highways are involved and affected by this project and yet I do not see where the Federal Highway Administration assumes any responsibility for decision making for the project. Where resources of national interest (rivers, wetlands, forests, aquatic species, such as bull trout, threatened grizzly bears, etc.,) may be affected by the scope (oversized equipment being moved over 300 miles) and duration (over a period of more than a year) of this project I believe Federal oversight is warranted and missing in this document. That this project involves Idaho and Montana overland, Idaho and Oregon and Washington via barge traffic on the Columbia and Snake Rivers as well as Canadian natural and cultural resources, I find it unacceptable that a simple EA with a 30 day comment period is being deemed adequate to address the human environment, no less the potential impacts to aquatic resources should an accident occur involving sensitive aquatic habitats such as Lolo Creek and Blackfoot River in Montana or other rivers of significant concern and resource values in Idaho. | 1. See responses to Common Comments A and F1.                       |
| 2 | { | Secondly, I object to the Appendix D dismissal of any substantive protections to aquatic habitats or wildlife/fish resources given the possibility, no, the probability that some accident is likely to occur between Clearwater Junction in Idaho and Lolo, Montana especially in the winter months proposed. I object especially of approving this project, then holding the contractor accountable to damages if anything should happen to affect the fragile environments affected by this planned action. Is it not reasonable and customary for a significant bond to be held in trust in case such accidents occur? What is the bonding requirements for construction and transportation contractors for this project? Will they be adequate to cover fill in Lolo Creek or fishing out an overturned behemoth that has ended up in that significant and irreplaceable resource?  | 2. See responses to Common Comments E2 and O.                       |
| 3 | { | Thirdly, I do not see where the US Fish and Wildlife Service has provided comments on potential impacts to listed species in the entire reach of this project. Are there not potential impacts to salmon/steelhead in Idaho or bull trout in Montana? It is not clear from this assessment what impacts were realistically considered under best or worst case scenarios for both construction and transportation portions of this action.   | 3. See responses to Common Comments I and O.                        |
| 4 | { | Fourth. I have driven the road from Missoula, Montana to Lewiston, Idaho in both summer and winter conditions and after reading this assessment, well at least selected portions of this near EIS sized document I am left with the impression that building turnouts along the rivers on either side of Lolo Pass is a cake walk as is transporting these huge machines in winter without serious risk of human life or aquatic life should an accident occur. It takes hours of pure concentration to make that trip in a four wheel drive truck, yes it's a "white knuckler" as far as I'm concerned and I don't believe the residents of that area will find it easier or safer with this  | 4. See response to Common Comment L.                                |
| 5 | { |  | 5. The US Fish and Wildlife Service was consulted (see EA page 62). |
| 6 | { |  | 6. See responses to Common Comments H1 and H2.                      |

action in progress during one or more winters.

7 { Fifth. A 30 day comment period for a document of this size and scope is inappropriate and you know it.

8 { Lastly, come on! You cannot piece meal this project by writing separate EA's in each affected area of this project to reduce the environmental effects. A project of this scope involving four states and Canada requires the comment period and scoping of an EIS and that is what I suggest you find in your decision document for this EA.

Thank you for the opportunity to comment on this proposed project.

Ron Crete  
 26183 292nd St.  
 Callaway, MN 56521  
 218-375-3244  
 rondolyn@arvig.net

7. See response to Common Comment F1.

8. See response to Common Comment B.

**CRETE, ZACH**

Name: Zach Crete  
 Address Line 1: 5166 Avalon Lane  
 Address Line 2: na  
 City: Lolo  
 State/Province: MT  
 Postal Code: 59847  
 Email Address: zachcrete101010@gmail.com  
 Phone Number: 406-546-3113  
 Fax Number: 406-546-3113

To whom it may concern:

Montana’s preamble to the constitution says “ We the people of Montana, grateful to God for the quiet beauty of our state, the grandeur of its mountains, and the vastness of its rolling plains, and desiring to secure to ourselves and our posterity the blessings of liberty for this and future generations do ordain and establish this constitution” [emphasis added].

What this means is that Montanans feel a special bond to the place they live and raise their children and felt the need to make it emphatically known. I have a story about my Montana. I live in the town of Lolo. In the state of Montana, I work exclusively on the Lolo Creek watershed. I hunt, hike, bike, climb, ski, work, and play with my kids all in my back yard: The

Lolo Creek watershed. Two weeks ago, my five year old daughter Kira and I were collecting stoneflies on Lolo Creek when we were interrupted by a cow and calf moose 20 feet from us on a gravel bar, wow! Not two minutes later we listened to a ruffed grouse drumming on a log while watching a mayfly emerge on a rock. These things are the norm not the exception. These things and many others like it are at risk when big money struts into town claiming things they can't possibly know with a shallow simple environmental assessment.

- 1 { First, how is it possible that an EIS has not been required when interstate money is being spent or will be spent if the project is approved. Shouldn't the Highway Administration be responding to this proposal? Shouldn't the Corp of Engineers for the travel on the Columbia River??
- 2 { Second, there needs to be more information about the Clean Water Act and the provisions therein. The wetlands of Lolo Creek are diverse and not always apparent. The ephemeral nature of many watershed habitats makes it difficult to know what you are working with if you don't have a good survey through time.
- 3 { Third, there will be long term maintenance costs for the newly constructed turnouts, that will in no way benefit Montana, that will be paid for by the taxpayers. The effects of additional snow removal and gravel on the road will continue to degrade the quality of the Lolo Creek watershed, and there is nothing said about this in the EA.
- 4 { Fourth, the EA leaves a lot to be desired in the event of an accident. This is huge equipment and if it ends up in the creek, what's the plan??
- 5 { Fifth, the money being spent is a joke. Most of it will go to a foreign truck company that fills up the gas tank at Exxon. There is very little economic gain for the state if any.
- 6 { Finally, accidents always happen and the cumulative effects to the Lolo Creek watershed, where the worst road conditions exist, has not been examined. An EIS is warranted with an application to an action of this scale. The NEPA process is the lawful route.

- 1. See responses to Common Comments A and B.
- 2. See response to Common Comment I.
- 3. See response to Common Comment L.
- 4. See response to Common Comment H2.
- 5. See response to Common Comment M.
- 6. See responses to Common Comments A, B, H1, H2, and H3.

Zach Crete  
 5166 Avalon Lane  
 Lolo Montana, 59847  
 Aquatic Ecologist USFWS YDNWR  
 Graduate student University of Montana  
 Member Lolo Creek Watershed Group

Name: Michael Cropper  
 Address Line 1: PO Box 1423  
 Address Line 2: Montana View Drive  
 City: Seeley Lake  
 State/Province: MT  
 Postal Code: 59868  
 Email Address: macropper@blackfoot.net  
 Phone Number: 406 677 5251

**CROPPER, MICHAEL**

Comment or Question:

I am deeply troubled by the Mt Transportation Dept.,'s sanction of the transportation of the equipment for Imperial Oil's facility in Alberta through Montana. This is definitely not in the interests of Montanans and this action should be reconsidered and put to the people of Montana.

1 { There is inherent danger of accidents to the traveling convoys which could be disasterous to the environment and cannot be avoided just by faith. Please do not do this, it is a serious mistake and all the money that we'll be told will come to Montana is not worth it. By accepting payment the State leaves all the onus for cleanup and repairs to the tax payers with no recourse in the courts. Please don't do this.

1. See responses to Common Comments L, H1, and H2.

Forwarded at Stacy's request.

**CUNDY, ANN**

Ann W. Cundy  
 Senior Transportation Planner  
 Missoula Office of Planning and Grants  
 127 W. Spruce St.  
 Missoula, MT 59802-4203  
 Stacy,

1 { I sent this to Dave (I live in the Rattlesnake) but I thought I'd send it to you too as you chair the committee:

Like many I've been curious about the Exxon transportation plan. Curious enough that I looked at the EA to try to answer a question I had regarding an alternate route.

1 { Using Kitimat, BC as the port of Entry would solve all sorts of the associated problems and greatly reduce the costs of transport. Yet, in the EA (Section 2.3 - Alternatives Eliminated) they apparently only considered Prince Rupert and NOT Kitimat. This is a weird decision. The Kitimat highway is the wide, paved haul road for bauxite to the Rio Tinto-Alcan smelter. The route would decimate the total mileage (ship & road) from Korea to Alberta.

Kitimat is the third largest deepwater port in BC and is a bit southeast of Prince Rupert. The road from Kitimat to Terrace avoids the height restriction 35 km east of Prince Rupert.

1. See response to Common Comment D1.

--  
 Steven Sheriff  
 Professor of Geophysics  
 University of Montana  
 Missoula, MT 59812-1296  
 www.umt.edu/geosciences

Messages and attachments sent to or from this e-mail account pertaining to City business may be considered public or private records depending on the message content. The City is often required by law to provide public records to individuals requesting them. The City is also required by law to protect private, confidential information. This message is intended for the use of the individual or entity named above. If you are not the intended recipient of this transmission, please notify the sender immediately, do not forward the message to anyone, and delete all copies. Thank you

Dearest DOT,

We have an issue on our hands. And by we, I mean the people of Montana, the residents in which you serve, to make this wonderful place better. It angers me to know that you are skirting around the larger picture here. I don't have enough fingers on my hands to count the obvious reasons that this big rig proposal is wrong. Aside from the fact that you're selling us out to one of the biggest and most destructive and dirty corporations on the face of the planet, you're setting us up for a large string of future failures. I am offended by your lack of emotion in regards to this issue, and your supposition that we as the people would turn our heads and not react up in arms. You're digging us a hole that we will never be able to get out of.

It clearly states in MEPA that to the fullest extent possible you will 'recognize the national and long-range character of environmental problems and, when consistent with the policies of the state, lend appropriate support to initiatives, resolutions, and programs designed to maximize national cooperation in anticipating and preventing a decline in the quality of the world environment.'

1 { If you had any right of mind you would do some research on the procedure of oil sands extraction. You would learn that oil sands are widely known as unconventional. You would learn that the process in which one extracts this oil from sand generates two to four times more greenhouse emissions per barrel than that of a barrel of 'conventional' oil. You would also learn that all processes of extracting oil from sands use excessive amounts of water and energy and at the same time emanate carbon dioxide. You would see photographs of these mining operations and not be able to fathom the degree of destruction they cause. You would learn that the land is

**CUNLIFFE, SHELBY**

1. See response to Common Comment E1.

ultimately irreclaimable after such a procedure, and the land in which is being mined is hundreds of square miles.

If you had any right of mind you would listen to the public very carefully. We are saying that the ‘benefits’ of this project don’t at all outweigh the deterrents. I scoff at your deduction that 68 million dollars is at all a legitimate incentive for us to allow you to carry on with the issuing of these big rig permits. We as your public aren’t at all unintelligent.

2 { I demand that you, for the sake of the quality of our human environment, follow through with an official environmental impact statement. I also demand that you extend the public comment period due to the fact that you all did a fine job keeping this project from the public’s ears until only recently.

The public has spoken. You've most likely made up your minds without our discretion. I pity you for that.

Good day,  
Shelby Cunliffe  
Missoula Resident

2. See response to Common Comments B and F1.

Mr. Jim Lynch  
Director, Montana Department of Transportation  
Capitol Station  
Helena, MT. 59620

1 { Director Lynch:I am taking this opportunity to request that Kearn Transportation request for movement of the so called “big load/rigs” be postponed until either a full Environmental Impact Statement is completed or Kearn Transportation address several issues which are of significant concern.

2 { During the presentation at the Meadow Hill School public meeting, Kearn representatives did not provide acceptable answers to questions concerning public safety, accident response and potential environmental contamination of Lolo Creek and the Blackfoot River. In addition, Environmental Assessment does not address the impact to tourism and the local economy.

2 { The proposed Environmental Assessment does not adequately address any procedures for dealing with a situation where the loads end up in Lolo Creek or the Blackfoot River. The EA talks about clean up equipment with each load, however, it did not address how a significant fuel spill in the fast moving Lolo Creek or Blackfoot River would be cleaned up. In addition, it seems that Kearn Transportation believes that no accident would ever occur. This sounds like the same attitude which as lead to the worst oil spill in American history at the Deep Horizons off-shore oil rig. Accidents happen and accidents occurring in a stream containing threatened bull trout are of

**CURDY, WILLIS**

1. See response to Common Comment B.

2. See response to Common Comment H1, H2, and H3.



serious concern. In addition, the EA does not provide any procedure to deal with life-threatening emergencies which might occur behind a big load accident on U.S. Highway 12.

3 { U.S. Highway 12 is a major tourist route into and out of Montana. Although, Montana has little or no influence over Idaho’s management of this project, local tourism oriented businesses will suffer because once the word gets out on the delays and traffic management issues with these loads in both Idaho and Montana, travelers will seek other travel routes thus impacting Missoula and surrounding area businesses. Whether the movement of these rigs is during the day or at night, there will be an impact and that impact must be addressed.

Again, I am asking that these questions be addressed through a more thorough vetting process.

Respectfully,

*Willis Curdy*

Willis Curdy

11280 Kona Ranch Road-Missoula, MT. 59804

3. See response to Common Comment M.

1 { Seldom have we had the chance to oppose an environmentally awful project in another country. But because mining of the oil from tar sands needs MT’s approval to drive massive, heavy loads of equipment over our highways, we do have this opportunity. Please don’t allow MT to be the facilitator of this bad plan. Besides which what those loads will do to our highways, roadsides, and drivers’ impatience is huge.

JUST SAY NO.

Robert A & Susan H Cushman

355 Cushman Lane

Condon, MT 59826

**CUSHMAN, ROBERT A. AND SUSAN H.**

1. See response to Comment E1.

1 { I'm e-mailing my complete SUPPORT for the Kearl Transport Project.

**DATSUNBILL [WDI44@YAHOO.COM]**

1. Comment noted.

Here are my comments after reading the EA in regards to moving the Kearl modules through MT:

**DAVIES, MARY ANN**

- 1 {
  - What IF an accident happens in a river? The EA does not address a contingency plan.
- 2 {
  - There is no plan for maintenance or re-construction of roadbeds that will need repairs in the future from these heavy loads. MT roads fall apart just from local traffic and weather. This cumulative effect was not addressed in the EA.
- 3 {
  - Overall, the transport of this large, heavy, and slow equipment does not provide enough benefit to our state and local economics over the impacts and risks.

1. See response to Common Comment H2.
2. See response to Common Comment L.
3. See response to Common Comment M.

Mary Ann Davies  
 825 Elm / 698 Shining Shirt (off N. Placid Lake Rd)  
 Missoula / Seeley Lake  
 406 721 7895

Dear Highway Dept Representative:

**DEATON, BOB**

I wish to register a protest of the Kearle Module Transportiton Project through Montana and Idaho.

1 { The equipment never should have been built to its size of 24' X 30', and as much as 200' long. It should have been built in smaller components that can be transported on our highways through existing laws and regulations in both states. The oil company also has the option to transport by ship to British Columbia.

1. See responses to Common Comments D1, D2, and D3

It should not be allowed through Montana at all.

Bob Deaton  
 2710 Mulberry Ln  
 Missoula, MT 59804

To whom it may concern:

I recently learned about the request by Imperial Oil for a transport permit through Montana for tar sand mining equipment destined for Alberta.

I am very concerned about the devastating effect tar sand mining has on the environment. There are multiple and serious concerns:

- 1 {
- 1. mining operations in Alberta destroy valuable old growth forests
  - 2. using oil derived from tar sands produces 3 times more greenhouse gases than conventional oil
  - 3. mining operations compromise water quality
  - 4. tar sand derived oil produces more air pollutants and particulate matter which affects Montanan's health.

- 2 {
- Please require a complete environmental impact statement before making any decisions to grant such a permit.

Thank you, Borries Demeler  
 P.O. Box 9252  
 Missoula, Montana 59807

**DEMELER, BORRIES**

- 1. See response to Common Comment E1.
- 2. See response to Common Comment B.

Dear Sirs,

- 1 {
- Please prepare a full environmental impact assessment on the tar sands. I am STRONGLY against the use of this terribly polluting and devastating energy source. And I think Montana should not allow them to ship their equipment on our roads. This is a terrible idea.

Thank you,  
 Erin Denton  
 Livingston, MT

**DENTON, ERIN**

- 1. See response to Common Comment B.

Dear Mr. Martin,

- 1 {
- I am writing you to urge you to deny the use of Montana highway 200, and Montana's portion of U.S. highway 12 by Imperial Oil to transport oversize loads to Alberta, Canada for the Kearl Module Transport Project. We, as citizens of Montana, have very little to gain and much to lose, in this transportation scheme. Our highways, public safety and enjoyment of Montana's scenic wonders will be severely compromised by these planned trips. The potential for a catastrophic accident caused by these massive loads, as well as the environmental damage in sensitive areas is too great to allow them to use our highways. We all know that this is simply the cheapest route for Imperial to use, and that in spite of their protests to the contrary, they simply do not care about

**DIERS, WILLIAM DEAN**

- 1. See responses to Common Comments G, H2, J and I.

Montana, our rivers, our highways or our way of life.

Do the right thing.

Sincerely yours,

William D Diers  
3530 Holly Lane  
Stevensville, Montana

1 { Why can't Kearl have these loads come into ports in British Columbia and use their roads to get to Alberta? Gerald A. Diettert, 9595 Nevada Trail, Missoula, MT, 59808, (406)549-2934, jerryandethel@yahoo.com

**DIETTERT, JERRY**

1. See response to Common Comment D1.

Dear Mr. Martin,

1 { I am writing regarding the planning and analysis for the Tar Sands shipment project completed by the MDOT. I am frustrated that the MDOT did a fairly cursory analysis on the impact of allowing the Exxon Mobile corporation to ship their equipment through Montana. The potential impact of these shipments on our environment, community, transportation needs, and so on is very significant and I urge your department to  
2 { complete a more thorough environmental impact assessment that addresses the impacts these shipments will have on our local communities, emergency vehicle passage, the  
3 { flow of traffic, and the potential environmental damage from road construction. In addition, the impact of the Tar Sands mining on climate change here in Montana should be considered as well. I appreciate your time and attention to this matter and I can be reached at 406-541-2727 if you have any questions.

**DOHR, KEVIN B**

1. Comment noted.  
2. See response to Common Comment B.  
3. See response to Common Comment P.

Sincerely,

Kevin B. Dohr  
1017 Sherwood St.  
Missoula, MT 59802

To Whom it May Concern,

1 { It is my opinion that the Kearl Module Transportation Project is a bad idea for Missoula and our surrounding natural environment. I fear the financial burden this project will put on tax payers, as well as the potential negative environmental impact. Please do not go  
2 { through with this project without a more diligent EIS - if at all.

**DOLAN, AMY**

1. See responses to Common Comments I and L.  
2. See response to Common Comment B.

Thank you for your consideration,  
Amy Dolan  
Missoula, Montana

Tom Martin

MDT Environmental Services Bureau  
P.O. Box 201001  
Helena, MT 59620-1001

Dear Tom,

My name is Jerry Dombrowske. My wife Cathy and I live at Milepost 36, Highway 287. We reside in the only habitation that faces the highway between Augusta and Bowman's Corner, a distance of about 19 miles. I am taking this opportunity to express several concerns I have regarding the proposed Kearsarge transport project, which if implemented would pass directly by our home and through our little town.

My concerns are divided into 2 groups. Group I is specific to the effects of the proposed action as it affects the environment at my residence. Group II is more general, and deals with the analysis process itself.

Group I : Direct effects on the area from turnout construction and use at Milepost 36.1 on Highway 287.

1 { As the owner and resident of the only house facing Highway 287 between Augusta and Bowman's Corner -- a distance of about 19 miles -- the impacts of the Kearsarge proposal on the air quality, wildlife, quality of life, use patterns, and potentially water quality of my piece of the world are of primary concern. Given the fact that ours is the only inhabited property along this stretch of road, it seems ludicrous to locate a parking turnout directly in front of it, rather than at a more appropriate location either north or south of Milepost 36. There exists a site about 1/2 mile to the south, adjacent to State land, which I believe would be much better from the aspect of real effects on both people and wildlife.

The EA discusses the construction of the turnouts and claims that their existence would be beneficial in the long run. This may be true for some, but it is false for others. An EA needs to speak to specifics to determine actual effects. The following comments are specific to this turnout, and activities at the Milepost 36.1 Highway 287 location:

2 { 1 -- Air Quality -- The use of this turnout by 12 vehicles per convoy and up to two convoys per day (as indicated in the Choteau Acantha's March 17 article on Bruce Brookman's presentation) will indeed affect our air quality -- 12 vehicles, some of them large diesels, idling for 10-20 minutes on the upwind side will affect and degrade the air quality at this point.

**DOMBROWSKE, JERRY AND CATHY**

1. This particular turnout has been relocated to MP 35.6. See response to Specific Comment B.

2. Most vehicles associated in the move would not enter the turnouts as they would be controlling traffic. Depending on other traffic using the route at that location, many turnouts would not be used for most modules.

3 { 2 -- Wildlife -- Our property is currently neither grazed nor cultivated. As such, it functions as nesting and rearing habitat for myriad species of birds and mammals. The birds include sharptail grouse and longbilled curlews, which are both Montana species of concern. Light and noise from 12 vehicles and 20 people once or twice each night will displace many of these nesting species and quite a few of the mammalian species present. Since this is the only currently undisturbed, ungrazed and uncropped parcel near here, these creatures will have to move a significant distance to find new habitat.

4 { 3 -- Human environment -- The construction and perpetuation of a parking turnout at Milepost 36.1 will have effects which outlast the use of this structure by the immediate Kearsarge project. Highway 287 is promoted as the scenic route between Yellowstone and Glacier National Parks. It is shown as such on some highway maps, and receives quite a bit of RV and tourist traffic. People presently stop on our driveway approach to take pictures, etc., but don't stay. The construction of a turnout will encourage them to stay, and even facilitate overnight camping, with its attendant litter and sanitation, disturbance, and security concerns associated with this use, as well as the disturbance to our privacy. Moreover, any pets traveling with them would not understand private property and would probably wander in; our own dogs are trained to protect our place and may react. At present, our dogs are trained to stay within certain perimeters directly around our home and outbuildings; the presence of campers and pets would make maintaining their training a challenge. If the analysis for the recent reconstruction of Highway 287 had proposed the construction of a turnout at this location, I would have appealed that decision, and the same is true in this case.

5 { The regular use of this turnout -- the only one in front of an occupied house fronting Highway 287 between Augusta and Bowman's Corner -- by Kearsarge convoys presents other concerns, as well. The staging of up to 12 vehicles with their engines idling for at least 10-20 minutes, together with the light plants, lights, radio traffic, people talking, etc, all occurring between approximately 1:00 and 4:00 a.m. will indeed have a significant impact, no matter what is claimed on Page 36 of the EA. The light pollution alone will result in a considerable disturbance. Litter and sanitation problems from 20 people per convoy will be significant. The disturbance to our dogs will destroy much of the training they have undergone, and last but not least the effects on my wife and me will be significant. Perhaps we are unusual, but both my wife and I tend to sleep between 11 p.m. and 7 a.m. The health impact of such regular disturbances during these hours really concerns me. Most of these problems can be avoided by simply moving the turnout planned for Milepost 36.1 back to Milepost 35.5.

Group II -- Comment on the analysis process.

3. See response to Common Comment I.

4. This particular turnout has been relocated to MP 35.6. See response to Specific Comment B.

5. See comment responses above.

6 { My first concern flows from the fact that Highway 287 is a Federal highway and has been reconstructed using primarily Federal dollars. As such, it seems that NEPA rather than MEPA would be the proper venue for this analysis.

Further, although the EA is well-written, it has some decidedly weak spots, false assumptions, and arbitrary decisions within it. The following are some of my concerns:

1) Purpose and Need

7 { The purpose of the report is clearly limited to how to make the Kearl project seem somewhat acceptable, rather than discussing whether the project should ever occur.

2) Scoping

8 { The EA mentions lots of names of officials. However, scoping should search out those people most likely to be affected by the proposed action. In our case, at least, that was not done, even though we are the only people living on Highway 287 between Milepost 20 and 39, and even though you have a parking turnout planned for our front yard. Not contacting us for our input ignored the basic principles of the scoping process.

3) Issues identified

9 { Given the scope of this proposal (up to 2 convoys per day with up to 12 vehicles and 20 people in each convoy at each site) the report should have included the effects on people who reside adjacent to stopping or parking areas or in towns along the route. This omission was probably the result of inadequate scoping.

3) Alternatives

10 { The Alternatives section does not include the most apparent one to many of us -- that of having Exxon Mobile (aka Imperial Oil) build and/or assemble the modules either in the northern U.S. or, more realistically, in Alberta. The exportation of this effort to Korea, where cheap steel and cheap labor are available, probably saved Exxon/Mobil lots of money, but the citizens of Montana will support that deportation of jobs with their own inconvenience and endurance of negative effects. One of these negative effects not addressed is, of course, the cost to taxpayers of repair and rebuilding of our highways once these heavy loads have passed through our part of the world and are making money for the oil company. Another would be the possible future use of this corridor,

11 {

12 { once established, for the shipping of further materials necessary to future expansion of work at the Alberta site.

In particular, the following supporting statements are completely arbitrary, some false and some inappropriate for an analysis.

6. See response to Common Comment A.

7. The need for the project is defined in the EA. MDT will decide whether or not the project should be allowed.

8. This turnout will be relocated to M.P. 35.6 of See response to Specific Comment B.

9. See response #2 for this letter.

10. See response to Common Comment D3.

11. See response to Common Comment L.

12. See response to Common Comment K.

13 { -- P. 25, 3.6.1 No action alternative: This is a blatant attempt to say that everything would go downhill if the project did not occur.

--P.34, 3.7 Air quality and noise: This section would actually indicate that 12 vehicles parked at any point for 10-20 minutes don't make any noise. It would also indicate that, so long as no actual noise ordinance exists at present, they would be free to create noise regardless of its impact on anyone.

--3.7. 2.5 PP2: "As a result, the noise etc. -- This is also an arbitrary statement. A 5% to 20% increase in daily traffic would most certainly have an impact, and loads 3 times the state weight limit coming downhill with Jake brakes working are certainly going to make noise. It is difficult to believe their assertion that "noise impacts on residences would be no greater than normal traffic."

--3.7.2.6: "Residences near parking turnouts would not be noticeably affected." This sentence is false and arbitrary -- Does anyone truly believe this? The cumulative impacts of noise and air quality, in addition to the factor of light pollution, will still be significant where convoys stop for 10-20 minutes at night. That, coupled with litter, sanitation problems and wildlife disturbances, indicate potential short and long term significant effects and need to be dealt with. To assert that there would be no noticeable effect is counter-intuitive and certainly arbitrary.

14 { The potential long and short term effects of this proposed action require an EIS to identify and evaluate them. The scope and magnitude of this proposal and connected actions -- only some of which were alluded to in this document -- also require that an environmental impact analysis be completed before any permits are issued or actions taken on the part of the state. I would also point out that, since the Kearsarge project affects Federal highways, as well as resources and people in multiple states, the National Environmental Policy Act applies, and an analysis under NEPA is required.

15 { All in all, this analysis appears to be a justification statement to give Exxon Mobil what it wants. There are apparent flaws in the analysis process. That the planners placed a parking turnout directly in front of the only residence fronting Highway 287 between Augusta and Bowman's Corner, even though a much better site is available less than a mile away, is indicative of a less-than-quality planning effort. Either that or the writer was suffering from a severe case of CCR1. Regardless, if these concerns are not addressed, I will appeal any decision adopting this proposal.

Sincerely,

Jerry and Cathy Dombrowske  
 P.O. Box 212

13. As stated in the EA, they would not make more noise than the current use of the road.

14. See response to Common Comment A and B.

15. See response to Specific Comment B.



2274 Highway 287  
 Augusta, MT 59410  
 Phone: 406-562-3617

**DOMITROVICH, NICK**

To whom it may concern,

1 { I am highly skeptical of the self-serving and conclusory proclamations made by project officials to date in regards to potential adverse impacts, as well as the alleged \$68 million beneficial impact on the local economy. This number fails to account for potential environmental degradation, impact to roads and bridges, as well as the countless hours likely spent by Montanans and visiting tourists trailing behind these crawling behemoths. I recreate several times per week in Montana during this season and know very well what the impact of big rigs is on traffic on roads like Highway 12 and Highway 200. Having personally witnessed a fatal accident just two summers ago on Highway 200, I'm particularly wary of any situation that will further exacerbate the safety concerns on these roads. Until we see some real comprehensive analysis and a clear boon to our state, I must insist that we do not allow this project to go forward. Thank you.

1. See responses to Common Comments, G, L, H1, H2 and M.

Nick Domitrovich  
 Missoula, MT

**DONAHUE, JANET**

1 { I oppose the issuance of a permit for the big rigs until a complete EIS is performed and results show no impact.  
 Janet L Donahue

1. See response to Common Comment B.

1 { I am in favor of letting these rigs move through Montana. I seems to me that they are going to have pullouts all along the designated highways to keep from holding up traffic too much. The state of Montana will benefit from the improvements as there are not many places to pull over on the routes that they are to be using. Dont deter the energy self-sufficiency. that our continent needs.

**DORI**

1. Comment noted.

Dori

Name: Devin Dotson  
 Address Line 1: 1210 V St NW, Apt 1  
 City: Washington  
 State/Province: DC  
 Postal Code: 20009  
 Email Address: devinmd@yahoo.com  
 Phone Number: 3342200891

Comment or Question:

I am dismayed to hear about the project where utility relocations, traffic structure modifications, turnout modifications and new turnouts will have to be made for ExxonMobil -- a company with billions of dollars of profit last year alone.

- 1 { Exxon should be required to dismantle their equipment into smaller, manageable loads that can be moved on Hwy 12 without all the damage to scenic areas including the Wild and Scenic Lochsa River in Idaho.
- 1 { Include the option where Exxon takes responsibility for its work and have them dismantle their equipment in Lewiston, Idaho before transport.

**DOTSON, DEVIN**

1. See response to Common Comment D3.

To whom it may concern,

- 1 { I am writing to express my concerns about the KMTP. The plan to use Highways 12 and 200 seems so ill conceived. Tourists and residents alike use both of the roads heavily in the summer months, driving cars, and trucks but more significantly driving rvs, motorcycles and bicycles. The KMTP plan will create dangerous driving conditions, as other users impatiently wait out road closures, or pass the big rigs with their big loads.

- 2 { I wouldn't be voicing my opposition to the plan, if we didn't have Interstate Highways 90 and 15 in place. They were built to handle interstate transport of military and commercial traffic, and can do so safely and efficiently.

Please consider this as you deliberate.

Thank you for your service to Montana,  
 Jody Drew  
 3114 South 7th Street West  
 Missoula MT 59804

**DREW, JODY**

1. See responses to Common Comments G, H1, H2, and H3.
2. See response to Common Comment D2.

<p>1 { I am opposed to the proposal of transporting the modules through the State of Montana. I do not accept the statements in the EA that this project will not have negative affects on our highways and waterways, especially the Lolo Creek and Blackfoot River drainages. If Canada wants to proceed with the project in their country, fine, then bring the equipment in through Vancouver B.C. and transport it across the Trans-Canadian Highway system. Dale J. Dufour 5550 Bison Lane Lolo, MT 59847 May 13, 2010 <a href="mailto:seaotter@montana.com">seaotter@montana.com</a></p>	<p><b>DUFOUR, DALE</b></p> <ol style="list-style-type: none"> <li>1. See responses to Common Comments D1 and O.</li> </ol>
<p>1 { Voicemail comment received by me today from Jane Duncan..... I want to register opposition to the Kearl Module Transport Project. I feel as though it would be a destruction to the environment and the effects would be lasting. Jane Duncan 20 Russell Park West Missoula, Montana</p>	<p><b>DUNCAN, JANE</b></p> <ol style="list-style-type: none"> <li>1. Comment noted.</li> </ol>
<p>To Whom It May Concern:</p> <p>1 { I am writing to request that the Montana DOT analyze the Kearle Module Transportation Project with a full Environmental Impact Statement, including Imperial Oil's request for high, wide load permits. The EA is inadequate. A federal EIS for this project is more appropriate, as it affects several states. Is any federal stimulus money (ARRA) being used on this project for construction of the 300 miles of highway in Montana or in any other way? If so, that requires a federal EIS. I totally oppose the project for many reasons.</p> <p>2 { 1. Travel and tourism is the second largest industry in Montana. The type of traffic and associated congestion with this project will be disruptive and a hindrance to visitors traveling by car. Potential visitors will likely avoid this area altogether. The Lochsa River, Lolo Creek, the Blackfoot Valley and the Rocky Mountain Front are some of the most outstanding landscapes in the United States. What impacts to these areas will the construction associated with this project have? The Lochsa was designated a Wild and Scenic River in 1968. How will this project impact the river?</p> <p>3 { 2. I am also concerned about safety on Montana's roads. The project will possibly disrupt the movement of emergency vehicles. This is unacceptable because it makes Montana roads even more dangerous. It is already treacherous to drive the snowy, icy roads of Montana during the winter with just one car on the road. There will be even more danger with this project because</p>	<p><b>DUPREE, BEVERLY</b></p> <ol style="list-style-type: none"> <li>1. See responses to Common Comments A and B.</li> <li>2. See responses to Common Comments M, J, and E2.</li> <li>3. See response to Common Comment H3.</li> </ol>

4 { more cars will be held up by the high/wide loads, and/or traveling closer together, which could cause more accidents. In addition, what impact will these loads have on the road infrastructure? Will improvements have to be made in the future at Montana's expense, further complicating tourism traffic?

5 { 3. I firmly oppose the use of Montana's (and Idaho's) beautiful scenic byways as a corridor for these types of loads at any time - now or in the future.

6 { 4. I would like the EIS to include an alternative that analyzes using the current route from the Port of Houston.

Thank you for the opportunity to comment. I would like to be kept informed about the development or termination of this project.

Beverly Dupree  
639 N 4th  
Missoula, MT 59802

4. See response to Common Comment L.

5. See response to Common Comment J.

6. See responses to Common Comments B and D1.

Dear MDT,

1 { Please extend the EA comment period and conduct a full EIS for the Big Rig project. The EA does not accurately or adequately evaluate the potential effects of this proposal. The EA does not consider the potential for long-term effects and does not fully disclose the potential impacts such as:

2 { 1. Stream impacts from wrecks which are frequent along these routes and **certain** to happen

2 { 2. Increased costs of maintainance for new infrastrucuture

3 { 3. Costs to businesses that depend on these corridors including outfitters, guides, motels, restaurants, etc.

3 { 4. Costs to all businesses and Montanans in lost time waiting - the proposal goals to limit holdups will never be met in the real world

5 { 5. Damage to roadways - these rigs will put stresses on roadbeds and other infrastructure never experienced before and that cannot be accurately estimated - **but will certainly occur**

6 { 6. Potential effects of protest actions and litigation on future movement of these rigs

**DUTTON, BARRY**

1. See responses to Common Comments F1 and Common Comment B.

2. See response to Common Comment O.

3. See response to Common Comment L.

4. See response to Common Comment M.

5. See response to Common Comment L.

6. Comment noted.

- 7 { - this project will create a storm of protests and litigation
- 7 { 7. Inconvenience to Montanans who will wait behind these rigs and the problems that develop - saying they will not wait is wishful thinking
- 8 { 8. Wetland impacts from new infrastructure - this is a required disclosure in the EA process
- 9 { This project sets a bad precedent for future corridor use and similar projects. It is essential that it be completely evaluated and the effects accurately conveyed to the public. Without such evaluation there will likely be years of litigation, protest and bad publicity for MDT.

Thank you for considering my comments.

Barry Dutton  
 2815 Tivoli Way  
 Missoula, MT 59802  
 406-728-4394 home  
 406-240-7798 cell  
[dbarry13@q.com](mailto:dbarry13@q.com)

7. See response to Common Comment G.
8. See response to Common Comment I.
9. See response to Common Comment K.

- 1 { As I understand the Montana Constitution, we are all guaranteed the right to clean air, water and the beauty of the landscape. If this project happens, This will not be the case for a great many people.
- 2 { I also understand that there is already a designated way to get these items to Canada, which does not involve the scary thought of really oversized truck on Highway 12 and up the Blackfoot.

Please say no.

Thank you,  
 Serena Early  
 Missoula

**EARLY, SERENA**

1. The EA indicated there would be no significant impacts on air or water resources.
2. See response to General Comment D1.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 {
- Conduct a programmatic review for the establishment of this permanent industrial corridor;

**EARLY, SERENA**

Form Letter 1

1. See response to Common Comment C2.

- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Thanks,  
Serena Early

Dear Montana Department of Transportation:

I do not support the Kearn Module Transport Project and the creation of a permanent 'high and wide' industrial corridor along Montana's highways and river ways. I urge you to:

- 1 { - Extend the comment period so to allow for the consideration of the full input from the citizens of Montana,
- 2 { - Conduct a full EIS on this project, under the standards of NEPA,
- 3 { - Require that real alternatives be considered,
- 4 { - Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry.

5 { The EA says there are no risks, but that is simply not true. In fact, that's the same that was said by the proponents of the Deepwater Horizon platform in the Gulf of Mexico. Of course there is a risk of an accident, fuel spill, or massive cargo spill into one of our rivers or highways. And, similar to the Deepwater Horizon accident, there is no contingency plan for how to address such an accident. Even without an accident, our rivers, views, and natural landscape will be impacted by widened roads, additional turnouts, and slow, heavy loads. The risks and impacts are simply not worth the return.

6 { Of the minimal economic benefits claimed by the proposal, few will actually benefit the average Montanan; most will go to out-of-state pockets. Montana businesses, will, however, be negatively impacted by the traffic and construction and those impacts are not properly documented or considered.

- 2. See response to Common Comment D1 and response to Common Comment D2.
- 3. See response to Common Comment M.
- 4. See responses to Common Comment A.

**ECOLOGY PROJECT, JULES OSBORN**

- 1. See response to Common Comment F1.
- 2. See response to Common Comment A and B.
- 3. See response to Common Comment D1.
- 4. See response to Common Comment M.
- 5. See response to Common Comment H2 and Common Comment O.
- 6. See response to Common Comment M.

7 { Additionally it is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands, not simply the 12 month period currently under consideration. This is a multi-state, multi-year endeavor and deserves a more thorough analysis and consideration of the long-term environmental and economic impacts.

It is the natural capital of this state that drives tourism and much of Montana’s business, my own included. To jeopardize this value for a short-term, low-return proposition like the Kearl Module Transport Project is a bad idea.

I appreciate your consideration of my concerns about these important issues.

Sincerely,

Julie Osborn

2502 Sycamore St.

Missoula, MT 59802

406 541-2712



Dear MT Dept. of Transportation:

I am concerned about Kearl Module Transport Project and the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic highways and river ways.

I relocated my business to the state of Montana over six years ago in part due to the beautiful and uncongested highways and the beautiful rivers. We have 30 highly qualified employees that we are able to attract and retain due to the natural value of our surroundings. It is this natural capital that is the driver of tourism and a lot of business that comes to the State of Montana. To jeopardize this value for a short-term, low-return proposition like the Kearl Module Transport Project is a bad idea.

1 { The EA says there are no risks, but that is simply not true. In fact, that’s the same thing they said about the Gulf platform. Of course there is a risk of an accident, fuel spill, a massive cargo spill into one of our rivers or highways. And the risk is simply not worth the return.

2 { Additionally it is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands, not simply the 12 month period currently under consideration.

7. See response to Common Comment K.

**ECOLOGY PROJECT, SCOTT PANKRATZ**

1. See responses to Common Comments H2 and O.

2. See response to Common Comment K.

This is a multi-state, multi-year endeavor, therefore, I urge you to:

- 3 { - Extend the comment period so that full input from the citizens of Montana can be delivered and considered,
- 4 { - Conduct a full EIS on this project, under the standards of NEPA,
- 5 { - Require that real alternatives be considered,
- 6 { - Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry

Thank you,  
 Scott Pankratz  
 2502 Sycamore St.  
 Missoula, MT 59802  
 406 541-2712

- 3. See response to Common Comment F1.
- 4. See responses to Common Comments A and B.
- 5. See response to Common Comment D1.
- 6. See response to Common Comment M.

Sirs:

This project proposal is almost too absurd and outlandish to comment on seriously. Additionally, I am fully aware that no amount of public input makes an iota of difference to the outcome of this sort of muscle play on the part of massive industrial money in Montana. The Corporate Tyranny that owns the country owns the Montana government as a minor subsidiary and the Governor and Legislature and the various bureaus simply take their orders from it and do whatever it takes to enable and facilitate its wishes.

That said, the flagrant idiocy of this proposal: to jam a massive convoy of gigantic Korean-made industrial parts, destined for one of the worst and most destructive environmental disasters in the developed world, by a front company owned by Exxon--those fun guys who gave you the Exxon Valdez adventure--down a system of two-lane roads along a magnificent, clean wild and scenic river corridor and through open range and tiny struggling cow towns is so insane and rotten that only the degraded slaves of Big Oil could even consider it.

Even degraded slaves, though, have been known to revolt.

See if you can't find it in what you claim are your hearts and minds to treat this vile and hideous piece of corporate piracy as what it is and shitcan it immediately, as self-respecting human beings would do.

The public is angry and some of what they're angry about is this kind of sweetheart suck-up to Big Oil. This is just another facet on the "drill-baby-drill" obscenity and you're in charge. If you rubber stamp it, you may get to feel some of that wrath directly.

**EDWARDS, PAUL**

- 1. Comment noted.



Paul Edwards  
630 Monroe  
Helena 59601

Please include this in the official comments as part of the public record.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

I hope you will support further study prior to implementation.

Michael Ellis  
412 W. Alder St.  
Missoula, MT 59802

**ELLIS, MICHAEL**

Form Letter 1

1. See response to Common Comment C1.
2. See response to Common Comment D1.
3. See response to Common Comment M.
4. See response to Common Comment A.

Tom Martin:

My first reaction upon hearing this proposal was "not Highway 12!" I have always loved this stretch of road and think it does not deserve the treatments being proposed.

I am aware of the fact that MDT is the responsible authorizing agency and that they recommended an environmental assessment be drawn up. At first glance, the public should at least have more time to consider the proposal and make comments to the EA.  
I hope that the comment period is extended.

**ENGLISH, PAMELA**

1. See response to Common Comment F1.

<p>2 { If indeed this proposal is approved, I would love to see Exxon / Imperial Oil held responsible for, at the very least, <u>a clear breakdown of the supposed gains to the Montana economy, a comprehensive contingency plan for accidental load turnover or load loss, and a binding agreement as to the future maintenance of roads, turnouts and bridges damaged by this overuse.</u></p> <p>3 { A more comprehensive and inclusive <b>EIS</b> needs to be written in order to capture all the losses and gains of a project of this magnitude. Thank you for your consideration of my points.</p> <p>-- Pamela English 1204 Margaret St. Missoula, MT 59801 (406) 546-4179</p>	<p>2. Section 3.6 of the EA does have a breakdown by activity of the contribution to Montana's economy, including salaries and taxes. See responses to Common Comments, H1, H2, M, and L.</p> <p>3. See response to Common Comment B.</p>
<p>1 { I STRONGLY <u>oppose</u> the proposal by Imperial Oil/Exxon Mobil to run 200 supersized vehicles through parts of Montana to the Canadian oil fields. Irene Erdie Helena, MT</p>	<p><b>ERDIE, IRENE</b></p> <p>1. Comment noted.</p>
<p>1 { I strongly encourage you to consider extending the comment period on the transportation route being planned from the Port Of Lewiston through Montana and into</p> <p>2 { Canada. It all seems a bit rushed and many questions have yet to be answered. I would also like to see more in depth Environmental Impact Assessments done and a more serious look taken at beefing up the transportation corridor already in place for large</p> <p>3 { loads, our interstate hwy system. Forcing this traffic into the Lochsa and Blackfoot River Corridors, areas traditional perceived as "the scenic routes", offers many challenges not the least of which is how to handle an accident when it happens, and it will. There are places in both canyons where the entire canyon could be totally shut down for through traffic should there be just one little mishap with these excessively large and heavy loads. Neither canyon offers alternate routes or even the possibility for detours to be established in many areas. Like the oil field miscalculation we are currently dealing with in the gulf, accidents do happen and we cannot afford to underestimate the potential here. Washington State said no to this transport on their highways. What makes this plan any more palatable for Idaho and Montana?</p>	<p><b>ERICKSON, MARY</b></p> <p>1. See response to Common Comment F1.</p> <p>2. See responses to Common Comments B and D2.</p> <p>3. See responses to Common Comments H2 and O.</p>

4 { In addition, both of these canyons are deemed by many as scenic corridors and the livelihood of many of the inhabitants of these canyons and those in communities near both areas depend on maintaining that scenic appeal. No one wants to see even a few minutes of their time enjoying the scenic beauty of these areas wasted, waiting in line to squeeze past a load ridiculously large for the road and the area. Once the word is out that that is what these areas are being used for, the tourism in these areas will dwindle and jobs will be squandered once again for corporate greed.

5 { Why not build these components in Montana? I'm sure there are companies capable of & willing to retrofit to accommodate the need. Then the need for transportation great distances is lessened. Better yet, make them in Canada or transport them across Canada and leave us out of the equation completely. There have to be better solutions than to forever alter these two corridors.

Mary Erickson, Sales Manager  
 Courtyard by Marriott  
 4559 N. Reserve St.  
 Missoula, Mt. 59808  
 406-274-9002 Direct  
 406-549-5260 Hotel Ph.  
 406-549-5257 Fax.

Hello:

Writing as a resident and taxpayer of Montana, with no business interests in it one way or the other, I would like to express my concerns about the proposed industrial corridor. On my gut level, I think we need to be incredibly careful about going forward with this project since substantial damage could be incurred. It would be difficult to undo such damage.

1 { Please ensure that a FULL Environmental Impact Study / Evaluation is done BEFORE any decisions are made. This study should be accomplished by non-business interests.

One of the greatest assets Montana has is our environment. Once it is gone, it's gone. Please, please, do the right thing and get the appropriate and complete information before making irreversible decisions.

Thank you,  
 Kathleen Evans, MD  
 118 Apple House Lane  
 Missoula, MT 59802

4. See responses to Common Comments J, N, and M.

5. See response to Common Comment D3.

**EVANS, KATHLEEN**

1. See response to Common Comment B.

This EA is inadequate for a number of reasons.

- 1 { 1. DOT regulations require the identification of logical termini for a proposed action. The justification for this appears to be political boundaries, which is an insufficient justification for logical termini. The logical termini needs to be clearly defined.
- 2 { 2. While some reasonably foreseeable future actions have been defined, those appear to be confined to future MDT actions. Reasonably foreseeable future actions need to include ALL actions regardless of what agency undertakes them. The timeframe used for the cumulative impact analysis is undefined as is the study area. For these reasons, the cumulative impact analysis done is insufficient to reach a conclusion that significant impacts will not occur.
- 3 { 3. A cumulative impact analysis also requires that both direct and indirect impacts of the proposed action be disclosed. Since it is clear that Tar Sands energy development could not continue but for completion of this proposed action, that energy development must be considered as an indirect effect of the proposed action. For this reason as well, the indirect and cumulative impacts analysis for this project is insufficient to reach a conclusion that significant impacts will not occur.
- 4 { 4. The historic property analysis does not discuss whether or not the SHPO or the THPO concurred with the Determination of Effects. Without this information, there is insufficient information to determine whether or not the proper process was followed in compliance with the National Historic Preservation Act or in compliance with Section 4(f) of the DOT Act.
- 5 { 5. There is minimal disucsn of the effects of tree trimming on historic properties through the Town of Chotean and adjacent to Bonner Dam and Mine. The analysis needs to address the criteria that resulted in the significance of these properties for inclusion on the National Register. Tree trimming may effect the setting of historic properties. This has not been defined
- 6 { 6. The parks, recreation areas and wildlife refuge section is insufficient to determine whether or not a Section 4(f) use will occur. Utility relocations do not address all potential Section 4(f) properties. This section has insufficient information to determine whether or not any future planned parks or trails would be affected. The minimal information provided about potential effects to access and parking in the vicinity of Section 4(f) properties. There is no discussion of consultation with Officials with Jurisdiction regarding existing or future Section 4(f) properties, and in fact, compliance with Section 4(f) is not even mentioned. Overall, this discusion is insufficient to determine whether or not a Section 4(f) use will occur.
- 7 { 7. Compliance with the Environmental Justice Executive Order is not even mentioned. Ther are likely to be effects to minority and low income communities due to noise (especially since transportation of the modules will occur at night), air pollution, the possibility of spills and other negative effects.

**FAUVER, BRIAN**

- 1. See response to Common Comment E1 and Common Comment E2.
- 2. The cumulative effects were analyzed based on activities as defined in 75-1-200(3), MCA. Those activities are described in Section 3.2.of the EA.
- 3. See response to Common Comment E1.
- 4. See Section 4.1.1.2 and 4.1.2 of the EA and Sections 4.5 of the Decision Document for information on consultation. Section 4(f) of the DOT Act does not apply to the KMTP.
- 5. See response to Specific Comment C.
- 6. Section 4(f) does not apply as this is not a federally Section 4(f) properties assisted transportation improvement project.
- 7. Environmental Justice is not a MEPA issue.

8 { 8. The assessment in the document of potential effects to wetlands does not meet the requirements of the Clean Water Act nor the requirements of the Executive or DOT Order for Protection of Wetlands. There is no functional assessment of wetlands that has been done. Broad statements are made that "the location will be adjusted or mitigation applied to avoid impacts to wetlands" or that "two of the six locations appear to have wetland characteristics and need to be reviewed." Both of these statements indicate that wetland impacts are likely to occur and yet there is a concluding statement that "the proposed project is not expected to affect water resources including wetlands." This assessment is completely insufficient and does not meet the requirements of the FHWA Technical Advisory, the Protection of Wetlands Executive Order nor the Clean Water Act. Full survey and delineation of wetlands, including functional assessment needs to be completed. Then both direct and indirect impacts to wetlands needs to be done. Practicable alternatives to the impacts to wetlands needs to be prepared and documented and mitigation needs to be fully defined and committed to.

In summary, this EA is insufficient to determine the direct, indirect and cumulative impacts of the proposed action. It is insufficient to determine whether or not significant impacts will occur. We respect that the City Council require a supplemental EA or an EIS.

-Brian

8. See response to Common Comment I.

Tom Martin  
 MDT Environmental Services Bureau  
 2701 Prospect Ave.  
 PO Box 201001  
 Helena, MT 59620-1001

**FAY, MARY E.**

Re: Kearn Module Transport Project

Dear Mr. Martin, et al, at the Montana Dept of Transportation Environmental Services Bureau:

1 { My first objection is assisting the progress of the Tar Sands project in **Canada**. I am opposed the our continued use of coal and this project is particularly destructive to the environment. I am also concerned about climate change and the Tar Sands project will only contribute to it.

2 { Secondly, using Idaho and Montana roads to haul this massive equipment has many problems. According to the proposal, there will be 200 loads on two lane highways for a year. The Lochsa River is a particularly fragile area. The areas in which this equipment will be hauled is in habitat of threatened and endangered species. The roads in Montana will take a beating. Will this

3 { company be responsible for the wear and tear of these trucks, plus an unforeseen damages as they use our state for their commerce? What kind of a bond will they be asked to pay? I think an EA

4 { is not enough and would recommend an Environmental Impact Statement.

{ This project will also set a precedent for making this route a corridor for future international hauling of equipment. I think it is a very bad idea that needs to have everyone take a second look.

1. See responses to Common Comments E1, I, and P.
2. See response to Common Comment L.
3. See response to Common Comment B.
4. See response to Common Comment K.

Respectfully Submitted:  
 Mary E. Fay  
 PO Box 6772 (2019 Winne Ave)  
 Helena, Mt 59604

**FELDMAN, MIKE**

MDT,

1 { This letter is written in support of the Kearn Module Transport plan. This project will benefit the local economy, improve our road infrastructure, and make for safer highways with road widening. It may also make oil less expensive by purchasing it from our neighbors, rather than overseas.

The only down side I can see is inconvenience while traveling behind one of the loads. I think the plan addresses that as much as it can. I will trade a little inconvenience for a better economy, safer highways, improved infrastructure and cheaper oil.

Seems like a fair trade.

Thanks,

Mike Feldman  
 1607 C St. Butte Mt. 59701

1. Comment noted.

I am writing to comment on Montana Department of Transportation's draft of the Kearn Module Transportation Project Environmental Assessment ("KMTP EA"). I am opposed to this plan and urge MDT to deny this proposal.

**FESSLER, CHLOE**

1 { I read the Environmental Assessment and found it lacking in significant areas. I believe a much more thorough Environmental Impact Assessment must be done before any part of Exxon's plan is allowed to begin.

My community, Missoula, MT, is one of the towns that will be affected by this proposed industrial transportation corridor and I am offended by the thought that any part of my community's character should be sacrificed so that Exxon can make more profit. All Montana communities along this proposed route will be affected by the industrialization of streets and roads through their communities.

2 { MDT's KMTP EA assess the impacts of this plan for the first year and that is a totally insufficient. This will be a permanent industrial corridor, once established, and the EA makes no mention of that fact nor makes any assessment of the effects of that permanency. Exxon will use this new road for more than one year and it will be used as an industrial transportation corridor for other over-sized shipments for years to come. Because the EA focuses only on one year, it does not analyze any impacts from future use and makes it impossible for MDT or Montana citizens to make an informed decision about the true impact of this proposal. That, alone, should be a serious enough flaw in the MDT KMTP EA to bring this proposal to a halt.

1. See response to Common Comment B.
2. See response to Common Comment K.

- |    |  |  |
|----|--|--|
| 3  | <p>The KMTP EA does not assess the impacts to Montana communities whose economies are dependent on ensuring that Montana's landscapes remain unspoiled. This region is known for its abundant wildlife, quality fishing and hunting, and recreational opportunities and diminishing any of these will affect local economies. Nor does this EA address the continuing financial burden to residents of this state for the costs of road and bridge deterioration or to maintain this road once Exxon moves on. The EA must analyze and account for the economic hardships that would be created by this proposal, both during construction and afterwards.</p> | 3. See responses to Common Comments M and L.   |
| 4  | <p>The conclusions drawn about job creation and income subject to Montana state income tax are disingenuous and unsubstantiated because there is no requirement for Imperial Oil to employ Montana workers and it is questionable as to how this conclusion made its way into the MDT KMTP EA.</p>   | 4. See response to Common Comment Q.   |
| 5  | <p>While MDT's KMTP EA addresses some possible environmental impacts, it is lacking in significant ways. Much of its conclusion that endangered or threatened species will not be affected is based on the premise that accidents will not happen. At best, that premise is unrealistic and basing conclusions on that premise is certainly questionable. In addition, the EA</p>  | 5. See response to Common Comment I.   |
| 6  | <p>does not evaluate plans to control or remediate the impacts caused by possible accidents. Specific contingency plans for accidents must be developed.</p>   | 6. See responses to Common Comments H1 and H2.   |
| 7  | <p>The broad statement the KMTP EA makes that site locations "will be adjusted or mitigation applied to avoid impacts on wetlands if necessary" is totally inadequate with regards to meeting the requirements of either the Clean Water Act or the requirements of the Executive or U.S. Department of Transportation Order for Protection of Wetlands. It appears that no functional assessment of wetlands was done for this EA.</p>  | 7. See response to Common Comment I.   |
| 8  | <p>Large vehicles using the corridor to transport heavy loads will increase the amount of brake dust on the road and surrounding areas. Much of this route travels close to river and streams. Recent studies have found that brake dust (especially copper) is toxic to a number of important fish species. The increased need to salt and/or sand and maintain the roadways will have an impact on nearby waters as well as just the increase in the amount of paved surfaces. Of particular concern are potential impacts to bull trout, a threatened species under the ESA. Neither of these issues was adequately address in the current MDT KMTP EA.</p> | 8. The addition of 200 loads over the course of 12 months is insignificant in relation to the current use of these highways and will not result in significant additional brake dust. The use of additional salt or sand on roadways due to module transports is not anticipated to occur. |
| 9  | <p>This route follows much of a designated National Scenic Byway and the Lewis and Clark Trail. When it enters Montana, it crosses Lolo Pass, a National Historic Landmark. I believe that industrializing this area with a super wide road and mega-sized tractor trailers and accompanying noise and pollution is completely incompatible with these irreplaceable assets. This is not addressed in the MDT KMTP EA.</p>   | 9. See response to Common Comment N.   |
| 10 | <p>This transportation corridor is being proposed so that Exxon can ship mining equipment to the tar sands industry in Canada. Because that industry generates three times the amount of global warming pollution as conventional fuel production, the KMTP EA should also consider what additional impacts that increased pollution might have on Montana.</p>  | 10. See response to Common Comment P.  |

- 11 { I do not believe that the MDT KMTP EA fully considered alternatives and it should. While it mentions alternatives, there is no serious consideration or analysis provided.
- 12 { I do not believe that the MDT KMTP EA considered the cumulative impacts across the region, even though it states that several federal permits will be needed. I ask that the state of Montana deny this proposal and seek a comprehensive federal analysis through the National Environmental Policy Act.
- 13 { Furthermore, I request that the public comment period deadline be extended for at least 60 days. For whatever reason, MDT choose to not engage the public in an early formal scoping process even though MDT has been aware of this proposal for two years. Public participation in the deliberations of government agencies is a fundamental right enumerated in the Montana Constitution (Article II, section 9). The 30 days public comment period provided by MDT does not meet that requirement, in my opinion. One could almost conclude that MDT does not want the public involved in this decision.

Thank you for considering my comments. I have serious concerns about this project and am opposed to the establishment of a high/wide transportation corridor through Montana. I also have serious concerns about the shortcomings in MDT KMTP EA and am opposed to continuing this project without those shortcomings being addressed. I sincerely urge the Montana Department of Transportation to extend the comment period, seek a comprehensive federal analysis through the National Environmental Policy Act and take an accurate accounting of the associated environmental and economic impacts of this proposal.

Sincerely,  
 Chloe Fessler  
 1509 Howell Street  
 Missoula, MT 59802

I am concerned about the Kearsarge Module Transport Project. I had intended to send just a short missive voicing my opposition, knowing that the staff of the DOT is busy and that comments often can seem redundant. However, having read in the Missoulian today that Director Jim Lynch will count identical comments as one, rather than 6,500, I feel compelled to expand on my remarks:

Having read through the EA, it appears that the potential impacts studied relate mostly to the road construction and improvements required for these enormous structures to be carried on Montana's roads. The EA finds little to no impact in most areas from the proposed road construction.

- 11. See responses to Common Comments D1 and D2.
- 12. See response to Common Comment A.
- 13. See response to Common Comment F1.

**FIREHAMMER, LISA**



1 { However, I am concerned also about the potential impacts from these giant loads, both on our roads themselves and on the safety of travelers on Highway 12, a two-lane, mountainous, wilderness route. Page 13 seems to be the only place in the entire EA document that deals specifically with the massive cargo, rather than just the construction to enable their transport. On this page, there is a photo of one of the gargantuan loads; it would be terrifying to come across one of these monsters, either coming or going. And I find no mention of icy winter roads (I know the transport will occur in fall, but I also know that Montana's weather is unpredictable) other than the idea that an escort-car driver could alert the driver of the over-size carrier to conditions ahead. Driving on Montana's four-lane highways in winter is adventure enough--driving on an icy, low-visibility, two-lane Highway 12 that is blocked almost entirely by these rigs would be treacherous at best.

2 { Finally, I am outraged that the DOT director would dismiss the e-mailed comments of 6,500 Montana residents, simply because they forwarded a "canned" message. In today's technologically driven world, many messages are sent via a simple click. It saves time for both the sender and the recipient. However, "canned," it is still public response. And it is not unusual practice in a public forum. I have attended dozens of public hearings where speakers simply echoed one another. When we sign a petition, we sign on to a "canned" message. When we vote, we mark "yes" or "no" to a single message. But these votes and signatures don't all count as one because they are in agreement. Mr. Lynch does not have the right, as a state official, to ignore the voices of 6,500 people, simply because they make the same remark.

Thank you for your time.

Lisa Firehammer  
 201 North Avenue East  
 Missoula, MT 59801  
 (406) 728-5664  
 firemeisters@yahoo.com

An addition to my comments of this morning:

1 { I wondered if train transport has been considered? I see in the EA that other roadways have been deemed unusable, but what about railways?

Thank you,  
 Lisa Firehammer  
 201 North Ave. East  
 Missoula, MT 59801  
 (406) 728-5664  
 firemeisters@yahoo.com

1. See responses to Common Comments H1, H2, and H3.
2. A representative sample of the text included in the NRDC e-mails is included in the response to comments section (Appendix D of the Decision Document) along with an appropriate response. A list of the names of the people who submitted the comment is also included in Table D-1.

**FIREHAMMER, LISA**

1. All investigated rail routes had tunnels or bridges with height restrictions.

1 { I would like to suggest negotiations between MDT and Imperial Oil to support interpretive signage along the proposed transportation route for the Kearsarge Modules, with funding for the project coming from Imperial Oil. The section of the route from Augusta to Choteau, Bynum and Dupuyer, and then over to Valier and up to Cut Bank provides idyllic locations to tout and educate visitors about our varied geographic terrain and history.

Imperial Oil needs approval for this route and this puts MDT in the driver's seat to negotiate some long-term benefits for Montana. While there would be potential job-creation for Montanans during the construction and transportation phase of this project, the benefits of being able to educate travelers on this route would be far more long-lasting.

The proposed plan creates the turnouts to allow transport of the modules. Let's take advantage of this infrastructure to pass along some education to visitors and residents alike through interpretive signage.

Gayle Fisher



**FISHER, GAYLE**

1. Comment noted.

1 { Quit wasting time and get the permit issued so these guys can get through Montana before the winter!

Matthew Fochs, Havre MT ~

**FOCHS, MATTHEW**

1. Comment noted

1 { This is to advise you of our support of the KMTP proposal. We do have property along the proposed route. We are in favor of and support the project.

Thank you for your attention.

The Fords

**FORD**

1. Comment noted.

Good morning: I'm writing to add my voice to the discussion.  
 1 { Please DO NOT ALLOW big rig crossing in Montana as the effects on tourism and ecology have not been explored.  
 Marianne Forrest

**FORREST, MARIANNE**

1. See responses to Common Comments I and M.

1 { Please prepare a full environmental impact statement, not just an environmental assessment, before you issue a permit to Imperial Oil to transport massive equipment across the state. It is  
 2 { important to consider the devastating cumulative environmental impacts of tar sands development-especially its contribution to global warming.  
 Thank you for listening.  
 Jackie Foster  
 Dillon, MT

**FOSTER, JACKIE**

1. See response to Common Comment B.
2. See responses to Common Comments E1 and P.

dear montana department of transportation,

**FRANCIS, JEFF**

1 { i was saddened to hear that i missed my opportunity in missoula to speak out against this terrible consideration - partnering in anyway with exxonmobil is a dubious venture at best, given this company's track record in both financial dealings and ecological disaster. montana can simply not afford to work with these sharks. i think if you do a comprehensive study you'll find that neither montana's economy nor fragile natural environment can withstand the overwhelming pressure which will almost certainly be imposed by big oil's money, attorneys and penchant for destroying virtually every environment they enter and profit from.  
 i bet that whomever in helena is at the head of considering the creation of this permanent industrial corridor is being lobbied heavily and financially by exxonmobil. it's just a guess on my part...  
 2 { keeping companies, such as exxonmobil, out of montana will further increase our property value while bolstering our tourist economy and service industry -- failing to do so will inevitably prove to be a critical mistake for montana's families, ecosystem, tourist industry and way of life.  
 sincerely,  
 jeff francis  
 missoula, mt 59801

1. Comment noted.
2. Comment noted.

To Whom It May Concern;

**FRANSEN, CHRISTOPHER**

1 { I am writing to express my opposition to the Kearn Module Transport Project. As a Montanan, I think that this project will benefit Imperial Oil/Exxon/Mobile and the Canadian Government while harming Montana's environment, people, wildlife and economy. These corporations are asking that they be allowed to disrupt the lives of anyone who uses these roads at the times they want to haul. Even at the proposed low

1. See response to Common Comment G

traffic times hunters, fishermen, outfitters, guides, commuters, delivery drivers, travelers, emergency services, etc. depend on these two lane highways at all hours of the day.

2 { The route that has been proposed is right through some of the best of this Last Best Place. Narrow winding highways through environmentally sensitive areas adjacent to headwaters and rivers, hundreds of infrastructure modifications, additional highway repair costs and delays and disruption of the tourism/transport/trucking industry are just a few good reasons to deny this awful project. I think that other alternative routes must be considered, particularly those in Canada. It is, after all, a private enterprise on Canadian soil.

3 { Allowing this project also make us partners in the very dirty business of developing Canadian oil sands. I know that the we have no control over a Canadian project, but facilitating it seems to go against the Montana Constitution's guarantee of a healthy environment. It is not our responsibility to harm ourselves so that Imperial Oil/Exxon/Mobile can make a bigger profit.

4 { In closing, I hope you will consider extending the comment deadline as many people are just becoming aware of the scope of this project. Thank you for accepting my comment.

Sincerely,  
 Christopher T. Frandsen  
 420 East Beckwith Ave.  
 Missoula, MT 59801  
 406-728-7792

2. See responses to Common Comments D1, O and L.

3. See response to Common Comment E1.

4. See response to Common Comment F1.

1 { Please don't permit this project to go ahead. It will ruin some of our most scenic highways, end up costing us in taxes, impact tourism, crumble our roads and bridges ... and all this for some fantasy financial advantage which is pure balderdash.

Let them off-load these monster machines at a Canadian port and transport them on Canadian roads!

Monika Franzen  
 Florence, Mt.

**FRANZEN, MONIKA**

1. See responses to Common Comments J, L, and M.

To Whom It May Concern:

1 { I am writing in regard to the above mentioned project. I urge you to oppose the approval of the heavy equipment transport through Montana. The route chosen is not only wild and scenic, but also of cultural and historical importance. There is just too much potential to impact the ecological value of the ground to be crossed. Besides the obvious impact to the state's highways, the end product of this transport caravan is more potentially harmful oil exploitation in Canada. As a resident of Montana, I really don't want a part in that destructive process.

2 { Besides the obvious reasons to deny this transport: If you received 6500 comments from one special interest group, and you are going to consider them as one comment... Aren't you ignoring the simple fact that 6500 people reached out to show their feelings about keeping this transport caravan out of Montana?

Thank you for your consideration.

Sincerely,

Donna L. Fraser  
 PO Box 36  
 Sheridan, MT 59749

Public comment taken over the telephone on May 14, 2010 (8:50 am) from:  
 Judith Fraser (calling from hospital bed)  
 338 Cooper Lane  
 Hamilton, MT 59840  
 Comment

- 1 { 1) I don't feel MT should play any part of Oil Sands Development. Unfortunate way to proceed, understand this project does not evaluate the oil sands but a very destructive process.
- 2 { 2) Lochsha, Bitterroot, Blackfoot, and Clark Fork River corridors are vulnerable and also have heavy traffic. No more sedimentation from pullouts and congestion from everyone backed up is needed.
- 3 { 3) If this were allowed could set a precedent-not comfortable that this is a one-time action and even more uncomfortable that there is a possibility this will be an industrial corridor from Washington to Canada.
- 4 { 4) Another example of a short term perspective, exploit natural resources to create tremendous profit for few, extensive damage to remain once project is done.

**FRASER, DONNA**

- 1. See response to Common Comment EI, I, and N.
- 2. A representative sample of the text included in the NRDC e-mails is included in the response to comments section (Appendix D of the Decision Document) along with an appropriate response. A list of the names of the people who submitted the comment is also included in Table D-1.

**FRASER, JUDITH**

- 1. See response to Common Comment E1.
- 2. See response to Common Comment O.
- 3. See response to Common Comment K.
- 4. Comment noted.

The following comments are from Friends of the Clearwater, a conservation group headquartered in Idaho, about the Kearsarge transportation project. We are opposed to this project and feel a full, federal EIS is needed to look at cumulative impacts and connected actions over the entire transportation route. While Montana is to be commended for doing an analysis, a full EIS is needed.

An EIS is needed to look at connected actions and cumulative impacts along the entire route. This includes the states of Washington, Oregon, Idaho and Montana. Port facilities that may need to be upgraded, likely using federal money, are an issue that can't be ignored. The water route up the Columbia and Snake Rivers was created with tax dollars from all US citizens. The highway systems--Federal Highways 12 and 89--are maintained with federal tax dollars.

Indeed, the US Forest Service will need to issue a special use permit (EA page 3) and that is a federal action. That conflicts with the allegation in the EA elsewhere that the turnouts won't go outside of the road right-of-way (ROW). The EA inadequately and inconsistently addresses this issue for the Lolo and Helena National Forests in Montana. The same situation exists for the Clearwater National Forest in Idaho. A full EIS is needed.

The specious conclusion that there would be no impacts to parks or national forests fails to consider accidents, increased traffic on roads within the reserves that could affect wildlife,

The impacts on Montana and the world from this project need to be considered. Global warming is recognized as a dire threat. Tar Sands are one of the dirtiest forms of energy. As such, the impact of this proposal is significant and that triggers the preparation of an EIS.

The economic impacts are inadequately considered. The claim that everywhere these rigs, they will be traveling at night is not born out when comparing planned stops, layover places and the average speed of these giant rigs. There is no question that traffic delays will have a negative economic impact. The EA omits the economic and safety impacts of diverting state troopers to deal with traffic delays and congestion caused by these rigs.

The environmental impacts in the EA are also inadequately analyzed. Turnouts along Highway 12 on the Lolo National Forest are within federal riparian habitat conservation areas for listed bull trout. The EA glosses over this fact. Also, turnout construction could introduce sediment into streams.

Terrestrial species are not adequately analyzed. The impact from increased traffic will lead to additional deaths. In fact, a large grizzly was recently killed on Montana 200 near Lincoln by a truck. The EA also fails to adequately recognize that Lolo Pass and Rogers Pass are both important corridors for wildlife movement. They are crucial connective habitat for rare and listed species like lynx, grizzly, wolverine, fisher, and wolf. While wildlife seeks to avoid roads, crossing roads is necessary to maintain connectivity, genetic diversity and eventually survival.

**FRIENDS OF THE CLEARWATER -  
MACFARLANE, GARY**

1. See responses to Common Comments A and B.
2. See responses to Common Comments I, H1 and H2.
3. See responses to Common Comments E1 and P.
4. See response to Common Comments G and M. Imperial Oil will enter into a contract with Montana Highway Patrol to pay for vehicles, gas, and salary (including overtime pay). Off duty Patrolmen will be used on a voluntary basis, therefore it will not impact normal Highway Patrol services.
5. See response to Common Comments I and O.
6. See response to Common Comment I

7 { Safety is not adequately considered. Emergency vehicles may need to use the roads when the rigs are moving. The allegation that there will be no more than a ten minute delay does nothing to assure those in immediate need

8 { In summary, the EA fails to look at the big picture including the impacts of the development of huge tar sands operations and the cumulative impacts and connected actions from that proposal. The EA also fails to properly analyze important site specific impacts. An EIS is needed that considered the cumulative impacts and connected actions of this project.

Sincerely,

Gary Macfarlane  
 Friends of the Clearwater  
 PO Box 9241  
 Moscow, ID 83843

7. See response to Common Comment H3.

8. See responses to Common Comments E1 and B.

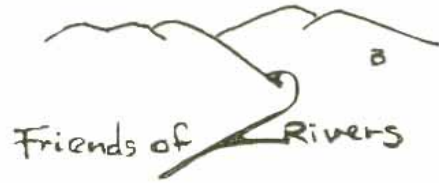
Hi, Dwayne

Please find attached our Friends of Two Rivers comment regarding the Kearsy Oil Sands Transportation Project in Western Montana. Friends of Two Rivers is a grass-roots organization of Milltown, Bonner, and Missoula area residents, initially organized to support the Milltown Site cleanup, restoration, and redevelopment. We are also active in encouraging developments that we believe are in the best interests of the community. The Transportation Project has received so little evaluation, that we strongly oppose it in the absence of a much more thorough consideration of risks and benefits. We believe that both State and Federal Environmental Policy acts should be fully utilized to help us better understand the environmental, economic, and social impacts of the Project. On its face, it is unwise to allow such a huge project of undetermined risk level on the 2-lane highways in the Lochsa and Blackfoot, where exceptional scenic, natural resource, recreational, and tourism values add to the essential transportation and emergency access needs of local residents. At a minimum, residents deserve a chance at a much more thorough evaluation of impacts.

Thank you for your attention to our comment.

**FRIENDS OF TWO RIVERS, GARY MATSON**

1. See response to Common Comments A, B, H3, and J.



**FRIENDS OF TWO RIVERS, GARY MATSON**

*Friends of Two Rivers PO Box 376 Milltown MT 59851*

7 May 2010

**Comment regarding Kearl Oil Sands Project’s transportation plan for Western Montana**

Dwayne Kailey

Montana Department of Transportation

PO Box 201001

Helena MT 59620-1001

Dear Mr. Kailey,

We understand that the oil companies participating in development of the Alberta, Canada Kearl Oil Sands Project propose to haul 200 pieces of extraction equipment from the Port of Lewiston, Idaho to the project site in Alberta. Beginning in the fall of 2010, 2 moving complexes per day would continue *through the winter* and into the following months. We understand the immense size of the transportation units, each of which involves several trucks and trailers with loads measuring 30 feet high, 24 feet wide and 162 feet long. Each load would weigh 330,000 pounds (165 tons).

Given the fact that this proposed route traverses river corridors of exceptional natural resource, economic, and aesthetic values for all Americans, these considerations cause us great concern:

- 1 {
1. The State of Montana has made only a cursory evaluation of impacts in its Environmental Assessment. There have been no estimates of social or economic impacts to communities in the proposed route, potential environmental impacts of

1. The EA does include such an assessment based on the likely impacts. See section 3.5 and 3.6.



2 { possible accidents especially likely to occur during winter, expected interference with local and tourist traffic, or any consideration of alternatives. There has been no consideration given to the structural limitations of the proposed 2-lane route: If there is an accident or other problem with a “big rig”, there are no potential traffic detours or alternate routes for emergency vehicles.

2. See response to Common Comments M, H2, and H3.

3 { 2. Creation of this route, described by MDT’s Director Jim Lynch in his report to the Montana Legislature’s Revenue and Transportation Oversight Committee as “...permanent High/Wide corridors through Montana...” will likely be the beginning of a disruption that will continue as the Kearsarge Oil Sands project is developed. The project is expected to be active through the year 2060. The modification of utility lines and construction of highway turnouts will cause further disruption and impact to a Montana way of life anchored in deep appreciation for our natural surroundings and their interacting biological networks.

3. See response to Common Comment K.

4 { 3. Extraction of oil from “oil sands” creates three times the carbon footprint of traditional oil wells because of the large amount of energy required to convert the deposits into liquid oil. At a time when the planet is increasingly at risk from a climate gone severely awry because of ignoring consequences of the exponential growth of fossil fuel use, a technology that adds to the exponential characteristic of that growth should be discouraged by responsible Montanans, not encouraged. No amount of short-term revenue to our State is worth the long term consequence.

4. See response to Common Comment E1.

5 { For these reasons and others, Friends of Two Rivers **strongly recommends** that the State of Montana **not allow** the Kearsarge Oil Sands transportation project to proceed pending a thorough economic and environmental impact analysis through utilization of both the Montana and National Policy Acts.

5. See responses to Common Comments A and B.

Sincerely,  
 Gary Matson,  
 Secretary/Treasurer  
 For the Friends of Two  
 Rivers, Inc. Board of  
 Directors

Tom Martin  
 Montana Department of Transportation  
 P.O. Box 201001  
 Helena, MT 59620

Dear Mr. Martin,

The Kearl Module Transport Project will have far-reaching impacts as it is currently proposed. An endeavor of this magnitude necessitates a full environmental impact statement rather than the inadequate environmental assessment recently conducted. This EA does not fully address many looming questions, including accident costs, highway costs, and the economic effects on local communities, wildlife and the environment.

1 { A comprehensive review of the full impact of the KMTP is needed to assess the situation accurately. Please consider **all** the aspects of this project by conducting a complete EIS for the Kearl Module Transport Project.

Sincerely,  
 Scott Friskics  
 1306 3rd Ave North  
 Great Falls, MT 59401  
[friskics@hotmail.com](mailto:friskics@hotmail.com)

**FRISKICS, SCOTT**

1. See response to Common Comment B.

Dear Tom Martin (or whom it may concern),

1 { I would like to voice my strong opposition to granting a permit to Imperial Oil Co. allowing transportation of their HUGE, GIANT, ENORMOUS equipment through Montana.

I don't see why any Montanans should be inconvenienced (at the very least) just so that another dirty oil company can add to their billions of dollars of profits at the expense of the ecology of the planet! If Montana grants permits for this transportation project we will be aiding and abetting the elimination of huge swaths of old-growth forests in Alberta, which is so close to Montana that it cannot help but affect us. (Even if it didn't affect us it should not be countenanced). And not only the degradation of the ecosystem, but we will share in the responsibility for adding hundreds of millions of tons of greenhouse gasses each year to the atmosphere! There has to be a better way. There is a better way to meet energy needs. The only goal this mining project aids is profit for a private company, at the expense of everybody else.

**GAGNON, RONDA**

1. See response to Common Comments E1 and P.

As a member of MEIC I hope you will see that there is no good reason for Montana to aid Imperial Oil (Exxon Mobile) in their ruthless and destructive quest for more and more profits. Please, allow common sense to win this time!

Sincerely,

Ronda L. Gagnon  
 255 Bayou Rd.  
 Kalispell, MT 59901

1 { I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. The proposal is for a one year transport permit, but once the changes to the roads are made it makes it easier to extend the permits for future transport. Highways 12 and 200 along the Lochsa and Blackfoot Rivers are 2 of the most beautiful and awe inspiring drives in Western Montana, to change them would be like improving the route to Logan Pass to accommodate logging trucks and big rigs. Montana's own tourism website describes the Blackfoot River as: *"a glacial stream, lined with large rocks, that occasionally gets squeezed into short canyons. The result is a dashing beautiful stream that provides outstanding whitewater excitement, incredible scenery, and dependable fishing. It's Missoula's favorite recreational river and there's no better place on a hot summer day."* How will the state reconcile this statement with the actuality of behemoth trucks going up Highway 200. What provisions are being made for wildlife protection, water quality and the impact on tourism and recreation?

2 { We already have commercial routes on Highways 15 and 90, if these transports must be made through Montana, let Exxon/Mobile figure out a way to use our established routes. What exactly will Montana be getting out of this deal and if it's such a great thing why aren't these parts going into Vancouver and across Canada Hwy 1?

V{x}l|x ZtUwEÇ  
 Cherie Garcelon  
 Arlee, MT  
 406-726-3270

1 { Consider the devastating cumulative environmental impacts & huge contribution to global warming (much more than oil) & vast air/water pollution- along with old-growth forest destruction. There is just a wrongness with the whole picture, like the 'oil spill' in the ocean on the U.S. southern coast now. Don't be part of the problem, promoting fossil fuels- when America Can go sustainable, renewable, efficiency. Insist upon upon a Full EIS, not just an environmental assessment- then NIX it!

**GARCELON, CHERIE**

1. See responses to Common Comments K and I.
2. See response to Common Comments D1 and D2.

**GARVEY, LYDIA**

1. See responses to Common Comments P and B.

You are blessed to have unique spectacular World Heritage wild nature areas- Keep them that way! Do your job- Protect Our Public lands, waters, health & wildlife!

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you

Lydia Garvey Public Health Nurse 429 S 24th Clinton OK 73601

1 { I am against this transport project because I feel it will involve extensive wear and tear on Montana roads that will not be compensated for. In this age of declining state and federal revenue road maintenance is already suffering and this big volume of truck traffic will greatly speed the deterioration of our roads. An independent assessment of this effect should be studied and quantified.

2 { I also do not feel proper measures have been taken to ensure that this could be a safe transport route. Mountain roads are treacherous; wildlife frequently cross the roads creating unsafe conditions for the wildlife and vehicles. Weather in the mountains is unpredictable and past history of truck accidents on mountain roads should elicit a more cautious approach to this project. Accidents happen despite best efforts and there is not a disaster back up plan in place.

The companies involved in the transport and subsequent production of the tar sand are only seeking to make a profit; all other concerns are not theirs so they will cut corners and not be concerned about safety and the long term effects on Montana.

Thank you,

Kathy Gaskill  
1520 Khanabad Drive  
Missoula, MT 59802  
406-829-8978

**GASKILL, KATHY**

1. See response to Common Comment L.
2. See responses to Common Comments H1, H2 and H3.

1 { Montanans are smart. They know Exxon will get the machinery to Ablerta one way or another. They know Exxon will pay us to transport the machinery through our state. They know Gov. Shwietzer is correct about the \$68 million infusion to our economy. They know we can use this money to improve our transportation system - especially in Missoula. Perhaps this is the funding source for the Russell Street Corridor Improvements! The opposition is trying to hi-jack the proposal by abusing the environmental rules as usual. Driving the rigs through western Montana is no bid deal. Welcome to our state, spend your money freely, thanks for rebuilding our road system, please come back.

**GASS, TOD**

1. Comment noted.

To Whom it May Concern:

1 { Please realize the effects of this project merit the in-depth attention of a full-blown EIS as required by law for projects with impacts similar to this one. Don't try to skate through on a wimpy EA because the governor says it's ok. It isn't ok. Do the job right and save the taxpayers money on litigation.

Steve Gilbert  
604 2nd St.  
Helena, MT 59601

**GILBERT, STEVE**

1. See response to Common Comment B.

1 { Hi, my name is K.T Gianoulias and thanks to MDT for providing this opportunity for public comment. As someone concerned about the significant impacts of this project on sensitive riparian areas, on road and bridge infrastructure, on our recreation and tourism industries, and on the communities along the proposed route, I call on MDT to conduct a full EIS on this project - anything less is unacceptable. The current EA is woefully inadequate: we must take all economic costs into consideration, and the current list of alternatives is artificially constrained. In addition, in light of the short period during which the public has had a chance to participate, I hope you will extend the comment period to 90 days to allow for full and effective public participation.

**GIANOULIAS, K.T.**

1. See responses to Common Comment B and F1.

1 { Given the massive size of the loads that Kearl wants to transport on our state highway system, I am very concerned about the potential detrimental impacts of this project on our roads and bridges, on our environment and our tourism industry. Given the obvious threat to public safety posed by these loads, I do not think this project should be approved until a more extensive study is completed. I urge you to extend the public comment period, and I would like to see a full-scale environmental impact statement completed before this proposal goes any further.

2 { Gary Glynn  
Missoula, MT 59803  
giglynn@gmail.com  
406-218-8956

**GLYNN, GARY**

1. See response to Common Comment L and Common Comment M.
2. See responses to Common Comments H1, H2, and H3.
3. See responses to Common Comment F1 and Common Comment B.

1 { I do not think this project should be allowed. There seems to be no contingency plan in place, nor any concern with the impact on Montana's roads this would have. These rigs are massive and would cause serious damage or injury if an accident were to occur. There needs to be further consideration on this matter before Exxon is allowed to use Montana as a thoroughfare

**GOLDEN, MICHELLE**

1. See responses to Common Comments L, H2, and H3.

2 { for transporting its equipment. This would also set a precedent for other oil companies to use Montana roads for transport. We all know these companies do not follow through with clean up in the event of an accident & Montana doesn't need another spoiled area because of big business.

Last best place & we'd like to keep it that way!

Sincerely,

Michelle Golden

1759 S. 7<sup>th</sup> St. West

Missoula, MT 59801

May 13, 2010

Montana Department of Transportation

POB 201001

Helena, MT 59620-1001

RE: Kearle Module Transportation Project

To whom it may concern:

Please accept this as my official public comment on the proposal to permit the Kearle module transportation project.

Under Montana's Environmental Policy Act, MDT is required to conduct a thorough environmental analysis prior to permitting projects that may significantly affect the environment. I find the EA conducted by the contract firm to be incomplete and inadequate in assessing whether the project will significantly impact the environment.

1 { 1) The EA failed to fully analyze alternatives to the proposed actions. The alternatives considered were scant, and those included were given only a cursory analysis. For instance, the analysis of alternatives failed to include an analysis of the economic cost of alternative routes, such as using interstate highways.

2 { 2) The EA failed to analyze the impact on public safety, including potential costs to counties, municipalities and the state of Montana.

3 { 3) The EA failed to adequately address the likelihood of an accident or breakdown, as well as the potential costs to local governments, local economies or the state of Montana that could arise from the response and recovery of a breakdown or traffic accident involving one of these Kearle module vehicles.

4 { 4) Finally, the EA failed to analyze the effect that construction of all the traffic and roadway facilities (eg: pullouts) related to this project may have on the likelihood of this applicant or other

2. See response to Common Comment K.

**GOLDMAN, DEREK**

1. See responses to Common Comments D1 and D2.

2. See response to Common Comments H2, H3, and L.

3. See response to Common Comment H2, H3 and Common Comment M.

4. See response to Common Comment K.

<p>applicants to be granted a similar permit in the future, for other projects using this corridor.</p> <p>5 { The Department should therefore conduct: a programmatic review of the establishment of this corridor for oversize loads, prior to permitting any individual oversized load project of this nature.</p> <p>6 { Given the inadequate analysis contained in the current EA, the Department should at a minimum conduct a full EIS under the MEPA to thoroughly assess all potential impacts of the project.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,  Derek Goldman  1759 S 7<sup>th</sup> St. West  Missoula, MT 59801</p>	<p>5. See response to Common Comment C1.</p> <p>6. See response to Common Comment B.</p>
<p>May 14, 2010</p> <p>Tom Martin  Montana Dept of Transportation  Environmental Services Bureau  PO Box 201001  Helena, MT 59620</p> <p>Dear Mr. Martin,</p> <p>1 { I would like to request that you do not allow Kearn Module Transport to bring their supersized vehicles through Montana.  In the first place it could derogatorily affect Montana's environment and wildlife, and it certainly would be dangerous for drivers.</p> <p>Please say no. Thank you.</p> <p>Sincerely,  Gretchen Grayum  906 N Benton Ave  Helena, MT 59601</p>	<p><b>GRAYUM, GRETCHEN</b></p> <p>1. See responses to Common Comments I, H1, H2 and H3.</p>
<p>1 { I strongly oppose the modifications which will have to be made to the corridor. I do not believe that trading chunks of our greatest resource: scenery, for a lump sum is a sound investment either in the short or long term. Establishing a transport corridor for large-cargo vehicles in one of the most scenic routes in America seems like a complete contradiction of interests and uses, catering to the most short-sighted of financial goals, which can only harm the state. I am concerned that the size and weight of the transport</p> <p>2 {</p>	<p><b>GRESHAM, KIMBERLY</b></p> <p>1. See responses to Common Comments J and K.</p> <p>2. See responses to Common Comments L and G.</p>

<p>3 { vehicles (both now and any in the future) will necessitate frequent road repairs which will be made by day, and thus delay and limit regular travel. And lastly, as a resident along the corridor (just off Reserve St.), I am concerned that my sleep and real estate values will be adversely effected by nightly vibrations. Kimberly Gresham 2669 Quinn Ct. Missoula, MT 59804</p>	<p>3. Noise and vibrations will be no greater than normal traffic already using Reserve Street due to the slow speed and axle weight.</p>
<p>1 { I am 100% in support of this project. This program would create much needed jobs in this community. Thanks. <b>Terry Grice</b> Gases Plus Norco 899 Parkway Lane Billings, Mt 59101 terryr@gasesplus.com</p>	<p><b>GRICE, TERRY</b> 1. Comment noted.</p>
<p>1 { I respectfully request that you deny the request for the 32J permit since the EA fails to consider potential accidents &amp; negative impacts to tourism. Thank you,  <b>Leah Grunzke</b> 406-493-0544 <b>Restoration Ranger</b> <i>Montana Natural History Center</i> 120 Hickory St. Missoula, MT 59801 (p) 406-327-0405 (f) 406-327-0421 <b>Greenhouse Manager</b> <i>Fishman Lab</i> University of Montana-Missoula (p) 406-243-5166 <b>Grassroots Music Director</b> <i>KBGA Missoula</i> UC Room 208 University of Montana Missoula, MT 59812</p>	<p><b>GRUNZKE, LEAH</b> 1. See responses to Common Comments H1, H2, H3, and M.</p>



Rebecca C. Guay  
1115 W. Third St.  
Anaconda, MT 59711  
(406) 560-3751

May 14, 2010

Dwayne Kailey  
Montana Department of Transportation  
PO Box 201001  
Helena, MT 59620-1001

Dear Mr. Kailey:

I am writing to express my deep concerns about the proposal for a "High and Wide" Transportation Corridor in western Montana.

1 { According to a July 2009 presentation by MDT Director Jim Lynch to the MT Legislature's Revenue and Transportation Oversight Committee, ExxonMobil's goal is to create "**permanent** High/Wide corridors through Montana," which, he said, would have "considerable potential for impact." I am confused, therefore, that the Environmental Assessment (EA) for the project portrays it as only a one (1) year project with 200 vehicles, and no environmental impact.

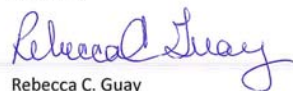
2 { Typically, environmental documents must address the full impact a project may have over its lifetime. The EA does not address ExxonMobil's goal of creating a permanent industrial corridor next to a Wild and Scenic River and the place where "A River Runs Through It". Some of the many impacts that must be considered include:

- 3 { • The Alberta Oil Sands project is expected to last through 2060 – entailing the movement of this large equipment for many years over the proposed route. The long term effects of this volume/size of traffic must be evaluated.
- 4 { • Wildlife impacts and fatalities created by traffic snarls.
- 5 { • Water quality impacts if the inevitable accident happens that creates a damming effect on the rivers, or if hazardous materials released.
- 6 { • Impacts on the blue-ribbon trout waters from the above "accidents" and those potential impacts on tourism and our Montana way of life.
- 7 { • Impacts on fishing and rafting guides and outfitters that rely on access to the rivers.
- 7 { • Noise and lighting impacts.
- 7 { • Impacts associated with the construction activities on turnouts, utility lines, etc.

8 { I urge the Montana Department of Transportation (MDT) to require a full Environmental Impact Statement (EIS) on the creation of at least the Montana portions of this industrial corridor. The EIS should at a minimum:  
9 { • Conduct a programmatic review for the establishment of a permanent industrial corridor;  
9 { • Require real alternatives to be considered;  
9 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;  
9 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts.

Thank you for this opportunity to provide comments on this important issue.

Sincerely,

  
Rebecca C. Guay

## GUAY, REBECCA

1. See response to Common Comment K.
2. See response to Common Comment C2.
3. See response to Common Comment K.
4. See response to Common Comment I.
5. See response to Common Comment H2.
6. See response to Common Comment M.
7. Impacts on noise and lights (see Section 3.0) and turnout and utility crossings are addressed throughout the EA.
8. See response to Common Comment B.
9. See response to Common Comment C2, M, and A.

1 { We wish to add our voices in opposition to this enormous boondoggle. For the MDT to be a party to this farcical corporate swindle is disgraceful. The vague promises of jobs and economic benefits are no compensation for the ecological disaster this ill conceived idea portends, not to mention the damages it will inflict on these most beautiful areas of our state. It is almost unimaginable what effects the incredible number and size of the required turnouts will have on our riparian areas and scenic highways. Then there is the high risk of something going wrong and one of these monsters ending up in Lolo Creek or some other fragile stream. (Think BP Gulf of Mexico blowout inspite of all the fail safe devices). We are not reassured by company propaganda to the contrary. You can be sure there will also be hidden costs (deliberately concealed?) for the taxpayers to absorb. We demand that you do the right thing for Montana. If there is no legal way to block this project, then you must require a full and complete Environmental Impact Statement and the accompanying process.

2 {

Thomas P. Hagan  
 Judith A. Hagan  
 710 Continental Way  
 Missoula, MT 59803

**HAGAN, THOMAS AND JUDITH**

1. Comment noted.
2. See response to Common Comment B.

I have had the opportunity to review the Environmental Assessment for the Kearl Module Transport Project and would like to make two comments regarding inadequacies in the EA. Both comments are directed towards the cultural resource segment of the document. The EA notes that there will be tree trimming activity within the boundaries of the Bonner Company Town National Register Historic District. As the lead author of the National Register nomination for this historic district, I would note that the nomination includes a historic landscape component and that the trees are recognized as as a contributing to the historic district. The EA does not address the potential adverse effect to a contributing resource to a National Register of Historic Places property.

1 {

2 { Second, the EA does not address the Lolo Trail National Historic Landmark and any possible effects to this property. The consultation process should include the Confederated Salish and Kootenai Tribal Historic Preservation Officer, the National Park Service, and the Advisory Council on Historic Preservation regarding any possible adverse effects to this NHL.

3 { The flaws in the EA with regards to these two cultural resources, in my professional opinion, indicate that an EIS is required. If you have any questions or need any clarification, please contact me. Thank you.

Daniel S. Hall  
 Western Cultural, Inc.

**HALL, DANIEL**

1. See response to Specific Comment C.
2. See response to Common Comment N. See Section 4.1.1.2 and 4.1.2 of the EA and Sections 4.5 of the Decision Document for information on consultation.
3. See response to Common Comment B.

Building 28, Suite 2  
 Fort Missoula  
 Missoula, MT 59804  
 (406)829-0301

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts.
- 5 { • We need the oil and the jobs, but..... Lets take the time and examine the issues carefully before proceeding

John Haller  
 345 Blaine St.  
 Missoula, MT 59801  
 406-549-0116-res  
 406-880-0512-cell  
[john@hallerweb.com](mailto:john@hallerweb.com)

**HALLER, JOHN**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.
5. Comment noted.

1 { I have followed this carefully and I agree with those that say this proposal has not been given enough scrutiny. It is ridiculous to say there is no backup plan if one of these things ends up in the river because it wont happen. Give me a break. This is why there is no backup plan in the Gulf of Mexico. Of course an accident can happen. Go back to the drawing board or better yet, say no!!

Annie Hamilton  
 Missoula, MT

**HAMILTON, ANNIE**

1. See responses to Common Comments H1, H2, and H3.

1 { I will definitely be there at Bonner in front of that first truck. I, too, feel like the little guy in Tienemen Square in front of the tank. It is time to say "no more"! Listening to the testimony in congress on the BP blowout has shown the complexity of beginning to drill a mile deep in the ocean at 80,000 pounds of pressure and then drilling another thousands of feet further for the oil. It all makes solar look pretty darn simple, clean, economical and practical. The bizarre thing is that Tar Sands technology is even less efficient, more costly, more environmentally insensitive and less productive than the deep water drilling. Just say no to oil.

Mary Hamilton  
 400 W. Franklin St.  
 Missoula, Mt 59801  
 406-721-1130

**HAMILTON, MARY**

1. Comment noted.

Tom Martin:

1 { From what I know about the Alberta tar sands extraction, it is a mega project boondoggle for the profiteering corporations who don't care a whit about the future of the planet. These mega-corporations just want to squeeze the last dollar out of the American and Canadian tax payers under the guise of job creation and domestic energy production. Just these convoys probably use up any oil that they may be able to produce. Add that to the energy it will take to tear up the land and the payback in production alone would end the project if it had to stand on it's own financial merits.

I seriously hope that you consider the long term consequences of this states cooperation in the implementation of this mega-project. Permitting the convoys of oversized trucks to cross on Montana's two lane highways for such an extended period of time or encouraging this project in any way is absolutely immoral. These projects have been lobbied through Canadian legal channels in the most horrifying manner and do the world no good at all. For the sake of distributed generation, prevention of global climate change, and the protection of the land for our grandchildren and theirs, please consider standing in the way of something so ugly. This is a chance for Montana to be proactive in the fight against environmental degradation on a grand scale by big big money. You're dealing with Exxon here, believe me, they don't care about anything but the almighty dollar. Exxon is equivalent to Haliburton, BP and Goldman Sachs). Let's let our little Montana voice be heard loud and clear.

Thank You for your consideration.

Mary Hamilton  
 400 W Franklin

**HAMILTON, MARY**

1. Comment noted.

Missoula, Mt 59801  
406-721-1130

Each turnout is longer than a football field. Each pink balloon is a new turnout. How can MDOT call this minimal environmental impact?

If a rancher wants to run a four inch pipe under the highway, you can make it so impossible and yet this project requires no EIS? Just try to remember who you are supposed to be working for. Think about how hard we have worked to keep the Blackfoot Valley pristine and how that has paid off for Montana's image and economy. This is a huge mistake in the making. These turnouts will be permanent scars on some of the most preserved parts of our state.

Mary Hamilton  
400 W Franklin St  
Missoula, MT 59801

**HAMILTON, MARY**

1. See response to Common Comment B.

I am opposed to any of the 200 convoys from the Imperial Oil company having access to Montana roads. The environmental impact of this project is so absolutely detrimental to the planet that we can't be responsible for supporting it in any way.

Marcia Hanks  
5815 Ellison Lane  
Florence MT 59833

**HANKS, MARCIA**

1. Comment noted.

Dear Montana Department of Transportation: Thank you for the opportunity to express our opinion on the transportation of heavy equipment in huge vehicles so that a company can mine and refine the Tar Sands in Canada.

- 1) The highways of Montana are dangerous enough as it is. We don't need some gigantic trucks – why should one commerce be more important than another.
- 2) There are real no jobs that will come out of this to anyone in Montana, Washington or Idaho.
- 3) There is a great deal of concern in the mining and refinement of the Tar Sands as being extra ordinarily harsh on the environment and uses an incredible amount of water. Anyone who has lived in the west knows that in our semi-arid climate, water is more precious than oil
- 4) We live in a changing world. To wean our dependence on oil or any fossil fuels will make a cleaner and healthier world.
- 5) We live in a world of climate change where our energy must now come from cleaner and greener sources. We need to have battery powdered or electric cars not more oil for gas burning cars. It is time to change.

**HARDIMAN, LISA**

1. See responses to Common Comments H1, H2, and H,3 M, E1 and P.

- 6) This project is about going backwards.
- 7) Please add my comment not to allow these monster trucks to take over our roads for a ridicules project.

Thank you very much.

Lisa Hardiman  
 3726 4<sup>th</sup> Ave. North  
 Great Falls, MT 59401  
 406-455-6412  
[lisa-hardiman@bresnan.net](mailto:lisa-hardiman@bresnan.net)

Hi,

1 { I would like to voice my opposition to having the Canadian trucks come through Montana to deliver their oil-rigging equipment. I don't care how many road improvements they claim, the impact of their large-scale scraping of the Earth is something that I want no part in supporting.  
 Thank you,

Emily Harrington  
 645 S. 2nd ST. W.  
 Missoula, MT 59801

April 27, 2010

To: Montana Department of Transportation

1 { I am writing in regards to the proposed transportation of machinery for the Alberta Oil Tar Sands project. I do not oppose oil exploration in general, but I do oppose possible permanent damage to some of Montana's most scenic river ways.

2 { Increasing the traffic and widening the roadways could cause harm to not only the aesthetic value of the region, but may also have economical effects as well. I would like to see research conducted on the economical impacts of the proposal.  
 2 { Tourism and recreation are now a large part of our economy, and to cause disturbances will unnecessarily hurt an already economically challenged region.

3 { I would also like to see viable alternatives proposed and considered for this plan.  
 4 { Currently this does not seem to exist. I would also like to see coordination with DEQ and the federal permitting agencies to properly analyze the transportation

**HARRINGTON, EMILY**

- 1. Comment noted.

**HARRIS, CODY**

- 1. See response to Common Comment J.
- 2. See response to Common Comment M.
- 3. See response to Common Comments D1 and D2.
- 4. See response to Common Comment A.

project as a whole under both the Montana and National Policy Acts.

Once this infrastructure has been established, there will be no going back. I encourage you to help preserve Montana for generations to come and not unnecessarily develop our few remaining scenic and wild valleys for a short term project.

Thank you,



Cody Harris  
210 Red Fox Rd  
Lolo, MT 59847  
406-207-2027  
cdharris1@gmail.com

I was just reading through this and although I beleive there will be affects of hauling these loads on the roads and that the actual hauling will cause a few inconveniences, I think it's a good plan.

1 { The highways will benefit greatly from added turnouts. Especially highway 12 as right now the turnouts are quite few and far between. Plus we all use fuel and complain about the prices when it goes up and Im thinking we should be willing to let the company take there things through. I think that they should be allowed to proceed!

Thank you for allowing me to voice my opinion!

Julie Harris  
381-7792

Dear MDOT,

1 { I am very concerned about the proposal to transport high and wide industrial equipment over Lolo Pass and through the Blackfoot River corridor. The Kearl Module Transportation Project will almost certainly NOT be a one-time proposal. The EA should take into consideration the much more likely scenario that the route will be used for decades to facilitate development of the Alberta Oil Tar Sands.

Please conduct a programmatic review for the establishment of this permanent industrial transportation corridor. Please require real alternative to be considered. Please provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry.

Thank you for considering my comments.

**HARRIS, JULIE**

- 1. Comment noted

**HART, JOHN**

- 1. See response to Common Comment C2, K, and M.

John W. Hart  
 301 Burlington  
 Missoula, MT 59807  
 406/728-4543

Dear Sir/Madam,

1 { Thank you for this opportunity to comment on the Kearl Module Transport Project EA. While I appreciate the opportunity to comment, the window of availability of project documents, communication issues and scale of the project unfortunately are not reflected in your public outreach process. Please include me on mailing lists for future project information. I suspect that many of your comments will be spent trying to familiarize many individuals with existing content in your EA. I hope you see this as a symptom of an inadequate review period. I suspect you'll see many half-developed comments as a result of this.

TIMELINE

2 { I was disappointed to see that MDT did not grant an extension on the comment period on this project and these comments have been prepared in haste, without a chance to thoroughly review the project and all of its impacts. A longer comment period is necessary for me to fully understand the project and thoroughly review the EA. Your website has also been slow to download the EA (and electronic communication issues complicated saving the EA from your website) and as I understand it, emails have been rejected. This is absolutely unacceptable and does not reflect an open process needed for a project of this scope.

EXISTING CONDITION DESCRIPTION IS INCOMPLETE Proper inventory of resources has not been conducted.

3 { Given the construction needed and the areas discussed, it is unclear if indeed this project can be completed. What is the proximity to wetlands and streams? What mitigation measures are in place to protect them, and more importantly, what are the impacts? The MDT has prepared an EA without properly documenting existing environmental conditions. Listing a series of vague protection measures does nothing to speak to the viability of this project.

WETLANDS

4 { How are wetlands being defined? This is not discussed.  
 Also it indicates that wetland surveys were conducted in October. Many areas would have been seasonally dry at this time and much of the wetland vegetation would have been dried out and unidentifiable. Therefore, it seems impossible for you to identify avoidance areas. The EA

**HARTWELL, MICHAEL**

1. See response to Common Comment F1.
2. See response to Common Comment F1 and Common Comment F2.
3. See responses to Common Comments I and O.
4. See the responses to Common Comments I and O.



should include a map of all wetlands identified on the route and proximity of developments to wetlands.

SPECIFICITY

The EA is vague with many undeveloped sections. For example:

--there has not been a complete inventory of wetlands --the revegetation plan has not yet been developed.

5 { --The spill prevention plan is not outlined --It is unclear how lighting will be directed to avoid impacts to wildlife at night. Who will oversee this? What areas will you avoid lighting?

CUMULATIVE EFFECTS

6 { Cumulative effects do not consider emissions or global warming impacts from tar sands oil industrial development in Canada. I understand that the project has been approved in Canada, but the MDT can not avoid the full disclosure of environmental impacts by piece-mealing the analysis and discounting the entire scope of project simply because decisions have been made outside Montana's borders.

7 { Montana's constitution guarantees a healthy environment and it is up to the State agencies to pursue that to their best ability. Using the rationale that an alternative route would simply be selected if this were not to occur in Montana is not realistic. It is a pre-decision determination with no validity. Please analyze the full extent of cumulative effects.

All of your cumulative effects sections seem to be a simple repeats of direct and indirect effects disclosures.

8 { Cumulative impacts should consider past, present, and future impacts when added with direct and indirect effects of this project. I don't any discussion of other past, present or future projects. Please include and analyze.  
What about other road maintenance? What about other projects that may lead to localized increased traffic (i.e., gravel developments, other road maintenance, private construction, logging projects). A thorough analysis of all EAs and EISs for other projects potentially contributing to in the proximity of the project area is necessary. In addition, other city, county and federal permitting actions with potential to increase traffic volumes needs to be analyzed.

5. See response to Common Comment H1. Lighting will be directed at workers only, and in areas where worker and public safety can be maintained (see Section 3.10.2.5 of the EA).

6. See response to Common Comment P.

7. See the response to Common Comment R.

8. This is the definition of cumulative effects under Federal NEPA. The definition of cumulative effects under MEPA is different and is defined on page 16 of the EA as "the collective impacts on the human environment of the proposed action when considered in conjunction with other past, present, and future actions related to the proposed action by location or generic type". (75-1-220(3) MCA) Those activities known to MDT are listed in the EA.

SUBJECT TO NEPA

9 { The fact that federal special use permits for this project indicates that it is subject to the National Environmental Policy Act. The issuance of those permits constitutes a Federal Action and this project is subject to the National Environmental Policy Act and should be disclosed as such and with full disclosure of total multi-state environmental effects.

9. See response to Common Comment A.

SOCIOECONOMICS

10 { The full financial impacts and responsibilities have not been disclosed as is indicated in Section 2.2.1.2. This indicates an incomplete disclosure of socioeconomic impact.  
 The socioeconomics section glosses over the whole project and potential negative impacts. Motor tourism in Montana is a large part of our tourism economy. Highway 12 in particular is a national destination for motorcyclists.  
 Delays caused in these scenic areas and subsequent rerouting of tourism traffic is not properly disclosed.

10. See responses to Common Comments M and G. No rerouting would occur.

11 { By creating and developing new turnouts scenic areas are permanently being modified. This has long-standing effects in our state. Tourists do not come to Montana to see blacktop. Please acknowledge this impact and the degraded scenic qualities associated with all of the project developments---particularly in valued scenic corridors.

11. See response to Common Comment J.

TRAFFIC VOLUME FLOW ANALYSIS FLAWED

12 { AADT calculations grossly misrepresent traffic flow information by stating that only an additional six vehicles would be added daily. These six vehicles are not at all comparable to other vehicles in the AADT analysis.  
 This part of the analysis is too dismissive. Exceptional impacts deserve exceptional analyses. Dismissing this as an extra six vehicles a day is misleading.

12. AADT was used appropriately.

TEMPORARY LOSS OF TURNOUTS

13 { One of the main functions of the turnouts is for public safety. Many of these turnouts will be unavailable during the project. I do not see where this has been addressed in detail. What happens if I have a flat tire at night and a turnout is not available? That means I'm potentially changing my tire on a narrow median in the dark. Yet you say traffic safety will not be substantially affected. The one example I've provided here shows you haven't really explored safety impacts.

13. Most turnouts will only be used for a short period. While driving at night, turnouts will be available for other users. If you were to meet a module at the exact moment you got a flat, you would already be stopped by traffic control. If you got a flat before or after the module movement, you would have access to any turnout. If you got a flat and the next turnout had a module parked in it, there would be enough room at either end of the turnout to safely change your flat.

BULL TROUT AND CRITICAL HABITAT and ESA

- 14 { You state that no effects will occur. This statement cannot be justified. Several developments have been identified in close proximity to sensitive areas. BMPs are not 100% effective and there is still risk to waterways.
- 14 { There are impacts, that is one of the reasons why you have designed mitigation measures. Impacts for this project exist on a continuum, not an absolute. The claim of no impacts is unrealistic. Saying that risks and impacts are minimized is more appropriate. Then you need to quantitatively describe those impacts in more detail. A more thorough risk analysis is needed. Also the wetland analysis and inventory is flawed---which invalidates your effects determination on aquatic environments.
- 15 { Indeed Federal permits are being issued as a result of this project, thus consultation with USFWS is required.

Sincerely,  
 Michael Hartwell  
 420 Strand Avenue  
 Missoula, MT 59801

Tom Martin  
 MDT  
 PO Box 201001  
 Helena, MT 59620  
 Monday, April 26, 2010

Dear Mr. Martin,  
 RE: Kearn Module Transport Project (KMTP)

I am very concerned about the impact of this convoy project upon wildlife, watersheds, and air quality, as well as the safety and health of people who live or travel along the route.

- 1 { I understand some of the equipment to be transported along Montana's highways will be as large as 24 feet wide, 30 feet high and 150 feet long! And furthermore that most of the roads are only 2-lane, and are curvy and steep through the mountain passes. Can you imagine a 150-foot long load negotiating these curves safely? I can't. Plus, the convoys of trucks and equipment will severely disrupt travel and communities across a wide swath of Montana.
- 2 { I am requesting that you do a complete Environmental Impact Study (EIS), not just an Environmental Assessment (EA), to consider not only the direct impact upon Montana's environment, but upon the planet of going forward with tar sands development in Canada. Here are a few additional points to consider:

14. See responses to Common Comments I and O.
15. Consultation with FWS is not required for an MEPA document, although the project was discussed with FWS informally (see Section 4.1.1.4 of the EA).

**HAUG, CATHERINE**

1. See response to Common Comment G.
2. See responses to Common Comments B, and E1.

<p>3 { Tar sands mining has irreversible impacts to the environment and public health, including:</p> <ul style="list-style-type: none"> <li>- Will produce 108-125 million metric tons of greenhouse gases each year. That's more greenhouse gases than conventional oil production by a factor of 3:1.</li> <li>- Produces excessive levels of harmful particulates that impair air quality</li> <li>- Requires the clearing of valuable old-growth forests.</li> <li>- Severely harms water quality.</li> <li>- Worst of all, burning the oil from tar sands produces more greenhouse gases per barrel than conventional fuel.</li> </ul> <p>Sincerely yours, Catherine Haug</p>	<p>3. See responses to Common Comments E1 and P.</p>
<p>To Whom It May Concern,</p> <p>Thank you very much for the opportunity to comment on the Kearsarge Module Transport Project. I have just recently become aware of this project and am gravely concerned about what it means for our communities and wildlands. This project is deplorable from a few different angles, but today I will stick with what concerns me the most: the transportation of these mega-rigs up the Wild &amp; Scenic Lochsa River corridor and over Lolo Pass.</p> <p>1 { Highway 12 is known as the Northwest Passage Scenic Byway for a number of reasons. The biggest reason may be because it is the route that Lewis &amp; Clark took over the Divide in their quest to find a northwest passage to the Pacific Ocean. This historical corridor is at the heart of America and needs to be treated as such. Turning it into an industrial highway though goes completely against that reality and threatens the integrity of our heritage.</p> <p>2 { The upper half of the Lochsa River is designated a Wild &amp; Scenic River under the Wild &amp; Scenic Rivers Act of 1968. This incredibly gorgeous river corridor does much more than appease the eye though; it provides habitat and spawning grounds for numerous native fish species such as chinook, steelhead, bull trout, and west-slope cutthroat trout. All four species have been deemed threatened or endangered at one point in time by the US Fish &amp; Wildlife Service. This rugged wildlife corridor also is home to black bear, cougar, lynx, wolverine, wolves, elk, moose, deer and countless other species. The reason why these aquatic and terrestrial species make their home here is because for the most part the landscape has not been altered or degraded by human development. This transportation project greatly threatens that though.</p> <p>3 { The Northwest Passage Scenic Byway, the Lolo Pass Visitor Center, and the Lolo Hot Springs are major destinations for tourists and travelers during all times of the year. The beautiful scenery and the tranquil atmosphere offer visitors a chance to recharge and get away from the daily vigors of life. I am greatly concerned about the impact this transportation project will have on local business owners and visitors to our area. The local economy in this region greatly depends on tourism dollars and Americans from all corners of the country need places like Lolo Pass to</p>	<p><b>HAVERSTICK, BRETT</b></p> <p>1. See response to Common Comment N.</p> <p>2. See responses to Common Comments E2 and I.</p> <p>3. See response to Common Comment M.</p>

visit and enjoy. Having hundreds of mega-ton trucks drive through this corridor would change all that.

Sincerely,

Brett Haverstick  
Moscow, Idaho

The EA seems to be a study in optimism < and the denial of Murphy's Law.

- 1 { In every assessment of effects, the transportation company seems to have been given the benefit of the doubt. Even the photos of the big rigs offer the least objectionable configuration, that is, a 16-foot wide load, as opposed to the 24-foot wide maximum.
- 2 { Furthermore, in its blithe avoidance of the worst-case scenario, the EA calls to mind the assessments that were performed before the certification of the Deepwater Horizon oil platform.
- 3 { In short, as a risk/benefit study, the EA is all benefit and hardly any risk. For instance, there doesn't seem to be an acknowledgement of lost man-hours of motorists stuck behind the rigs.
- 4 { Or the possibility of a catastrophic accident. Or the possibility that a private vehicle not connected to the transporter's communication network could be delayed during an emergency trip. Or the distinct likelihood that once the route has been made big-rig-friendly, subsequent
- 5 { projects will find their way over Montana's highways, with permitting fees that seem inadequate to state-borne costs of each trip.
- 6 { For all these reasons, I urge the MDT to perform an EIS.

George K.C. Hayes  
Concerned private citizen  
(406) 543-1944  
1321 Jackson Street  
Missoula MT 59802  
[gkchayes@montana.com](mailto:gkchayes@montana.com)

Hello -

- 1 { I am a local resident urging you to consider refusing access for tar sands equipment being shipped to Canada on Montana roads. Beyond the devastating effects of tar sands mining - the convoys of trucks and equipment will be a burden to our roads and communities.

Please Say No.

**HAYES, GEORGE**

- 1. See Appendix E in the EA.
- 2. See responses to Common Comments H1, H2, and H3.
- 3. See response to Common Comment G (analysis of lost hours),
- 4. See responses to Common Comments H1, H2, and H3.
- 5. See response to Common Comment K.
- 6. See response to Common Comment B.

**HEINZMANN, HOLLY**

- 1. See responses to Common Comments E1 and L.

thank you,  
Holly Heinzmann  
Norris Hot Springs  
Norris, MT 59745

- *Tar sands mining is one of the most destructive forms of energy development and has irreversible impacts to the environment and public health and furthers global warming pollution.*

This is test, says artist Mark Dion, if we pass, we get to keep the planet.

We love light crude oil from the east of the world for our touchy refineries. We ship our oil back to points in the east and say we are mining to relieve ourselves of the import debt burden. That has never been true.

1 { If we lose control of tankers or oil rigs then another chunk of our diverse ecosystem dies and we fail the test.

When we destroy a diverse ecosystem we cannot get it back. It's changed. The consequences are disease and global warming. The spirit of our place is sacrificed to the God of Money and a lack of imagination: not every single person needs one or more cars. Oil and coal are not the only energy sources that belong in our national and international energy portfolio. Our niche of ecological wonder here in the northwest nurtures our spirit. This does not resonate with industrial development on the scale of humungous industrial corridor.

2 { The Kearl Module Transport Project is not a one-time affair. This equipment is going to work in the tar sands oil fields of Alberta Canada; this is only the beginning of plans for an industrial corridor to be built through some of our most prized scenic and diverse ecologies. It is an assumption that the energy portfolio will remain the same forever ad naseum until all the oil and coal is gone and the profits are made in this decade or two. We do not have a plan for long-term growth that, yes, can include coal and oil. This is an egregious effort to mine one of the largest oil fields in the world, and for export. Get the money and run – no long-term development goals needed here – our spirit, our community goals are mere inconveniences to such a force of profit.

3 { Remember, they have no federal EIS for casualties on this trans state and trans border project. They are bringing us into this transport corridor because we have the roads they want. If something goes wrong, we can just litigate – take our anger and broken spirit to the courts – they can afford it – we can't.

Please disallow this use of our public transport systems and keep our spirit alive.

Thank you,  
Linda Holding Schure

**HELDING-SCHURE, LINDA**

1. Comment noted.

2. See response to Common Comment K.

3. Comment noted.

born in Missoula 1946  
lived here on and off all my life  
P.O. Box 812  
Arlee, MT 59821

**HENDRIX, TOMMY**

To whom it may concern,

My name is Tommy Hendrix and I have lived in Missoula county for 32 years (my whole life). I spent my childhood growing up along the Blackfoot River. As I have watched the old mill site in Bonner finally close and the restoration of the confluence of the Blackfoot and Clarkfoot rivers I am excited for the future of these great valleys. I understand people are weary of future jobs, but with our future comes progress. We now have an area that was highly polluted by large industries finally being returned to normal, or as close to normal as man can get. We all know tourism can bring more money and clean jobs to our beautiful area in the future.

Although I am not against large machinery moving through our state, I am opposed to this project. To think Montana and Idaho would allow something like this to occur on two of the most scenic and precious highways our country has is sickening and stinks of big money. No matter how you try to sell this to the public you must be crazy to think the majority of us in Missoula County would ever be willing to let this happen without some sort of possible legal challenge.

I lived along the Blackfoot Highway in the late eighties and early nineties when the highway was straightened and widened. I remember evacuating our house when they were setting off charges etc. You tell us you'll only allow ten minute traffic delays, but whose really going to enforce this. I remember insane traffic delays during the major construction. Were they held to the same rules and if so how easy is it to bend those same rules. Even with the reconstruction, this state has no business allowing something like this to travel the Blackfoot corridor. The first few miles of the Blackfoot highway are built upon wire cages with rocks inside to hold the road up so it won't crumble into the Blackfoot River. Isn't allowing something like this over a years time going to put more strain on those cages?

Although I haven't read the EA (I will), I am curious if things like sediment control, elevated emissions, traffic congestion, emergency response, disruption in tourism, disruption in recreation, disruption to wildlife, disruption to fire response, etc. has been considered.

1. See response to Common Comment G. MDT may revoke the oversized load permits if the 10 minute rule is not followed.
2. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs.
3. Sediment control and air quality are discussed in the EA in Sections 2.2.1.3 and 2.2.1.7 respectively. See response to Common Comments H3, M, I and O.

4 { What if we have a good snow year? I have personally seen the Lolo Pass area reduced to one lane of traffic between huge walls of snow. It can't possibly be safe to allow these big rigs over Lolo Pass in the winter. I can just imagine the traffic backing up during the rush of summer activities, the extra car accidents, and other unplanned events that will come up.

5 { Considering the richest industry in the world has proposed this, tells you this is a great idea for them and a bad idea for everyone else.

5 { British Columbia, Canada has ports and highways so let them use their roads. Who cares if it cost the oil industry a little extra money, trust me they have plenty.

5 { Oh and yes I do rely on fossil fuels, because I have to. I live in a nation that has had ample technology to change this, but like our GREAT STATE of MONTANA our government always gives in to big industry. It's time for a change and this is your chance to take a stand. Don't forget the State of Montana and the Federal Government gave us Reserve Street and what a great failure it has been, so of course we're weary of anything the MDT plans to do in Missoula's back yard.

Sincerely,  
Tommy Hendrix  
4918A Potter Park Loop  
Missoula, MT 59808

4. While Module transportation is allowed during the winter, the modules would not be transported during inclement weather (see the MTP). MDT currently maintains the full width of Highway 12, modules would not proceed if the roadway was reduced to one lane of travel.

5. Comment noted.

1 { We in Montana who live here for the beauty and wildlife need fear for the same if these big rigs come through. We need to let them go somewhere else and we need to see that this sort of thing does not go unnoticed. If our transp director thinks it is a great idea I have to wonder what he gets out of it. we can only wonder and say no no no

Dave Herries

**HERRIES, DAVE**

1. Comment noted.

1 { Jennifer Hill-Hart, Missoula, MT

1 { Please do not force Missoula, let Montana, to enable this dirty, costly and inefficient fuel source. Tar sands are not a long-term option for energy. Please don't let Montana jump the gun on this just because of the infrastructure improvements, when it is highly likely the projects will be ended mid-construction because tar sands energy development is too costly to sustain.

Thank you,  
Jennifer

**HILL-HART, JENNIFER**

1. Comment noted.



I'm writing to urge the Department of Transportation to turn down Imperial Oil Co.'s application for a permit to truck tar sands mining equipment across Montana. The impacts of tar sands mining on public health and the environment are overwhelmingly negative, and not something Montana should facilitate.

As you must know, this type of mining produces massive amounts of greenhouse gases and high levels of harmful particulates. This particular project in Alberta would require the clearing of old growth forest and would severely harm water quality. On top of all this, burning the oil from tar sands mining produces more greenhouse gases per barrel than conventional fuel.

Please consider all these factors as you review Imperial Oil's permit application. Why would the state of Montana want to contribute to more global warming, degraded air and water quality, and loss of more old-growth forest? Please prepare a full EIS, not just an environmental assessment, regarding this project.

Thank you for your consideration.

Sincerely,  
 Grace Hodges  
 14 S. Raleigh St.  
 Helena, MT 59601

**HODGES, GRACE**

1. See response to Common Comments E1 and P.
2. See response to Common Comment B.

My wife and I are writing to express our view concerning the desire of Imperial Oil to bring oversize loads through the state of Montana. If this should happen, it must only be after a full Environmental Impact Statement has been completed. The Environmental Assessment does not deal with the negative and costly ramifications a permit to this company would/could impart on this state. We must consider in detail the effects on our state, both short term and long term, of highway accidents caused directly and indirectly by these rigs, of possible effects on our scenic rivers and wetlands, of delaying and stopping normal traffic, of winter conditions, of the long term disadvantages of all the extra pullouts that would be constructed to accommodate these loads, of the unknown long term effects on our roads and bridges, just to mention a few.

To consider allowing this company, with its environmental record, to "rearrange" our lives and highways without a thorough analysis (EIS) would be nothing less than foolhardy.

Ron and Karen Hoff  
 870 Rankin Road  
 Missoula, MT 59808  
 406 543 8556

**HOFF, RON AND KAREN**

1. See response to Common Comment B
2. See responses to Common Comments H1, H2, H3, O, and L.
3. See response to Common Comment B.

<p>Public comment taken over the telephone on May 14, 2010 (3:10 pm) from:                  Scott Howard                  9590 ½ Anderson Road                  Missoula, MT 59802                  Comment</p> <p>1 { 1) I'm opposed to getting low quality oil and the trucks coming through the Lochsha corridor.</p>	<p><b>HOWARD, SCOTT</b></p> <p>1. Comment noted.</p>
<p>To the MDT:</p> <p>1 { I urge you not to approve this. I'm all for more jobs for Montanans, but not at the expense of the land we treasure.                  -M Hutchins</p>	<p><b>HUTCHINS, M</b></p> <p>1. Comment noted.</p>
<p>1 { This Exxon proposal is absurd! Have we not learned enough about being abused by other big corporations in Butte and Libby and...?? It's time Montana stood up and said NO to any kind of activity that detracts from the environmental quality we hold dear. I am appalled that this silly proposal has gotten far enough to waste our time!</p> <p>Richard Hutto                  Missoula, MT</p>	<p><b>HUTTO, RICHARD</b></p> <p>1. Comment noted.</p>
<p>Dear Tom:</p> <p>1 { The proposal to move mining equipment through Montana is absurd. We are the most environmentally intact place left on the planet, and we should be the last place to offer support to companies that continue to extract non-renewable energy. In addition, there are unstudied effects of noise and traffic holdups on wildlife all along the proposed route. Summer is a time to enjoy the roads of Montana at all times of day and night without having to bear the environmental costs of a company that uses us the same way ARCO and ANACONDA and GRACE have done, leaving us to deal with the unforeseen environmental and health consequences! WHY ARE WE WASTING OUR TIME DISCUSSING THIS PROPOSAL? NO is the answer. NO. NO. NO!</p> <p>Rick Hutto                  3707 Creekwood Rd.                  Missoula, MT 59802</p>	<p><b>HUTTO, RICHARD</b></p> <p>1. See the response to Common Comment I.</p>
<p>from Roger and Janice Inghram                  61 Whitetail Acres Lane                  Grangeville, ID 83530                  208-983-0616                  inghrams@mtida.net</p>	<p><b>INGHRAM, ROGER AND JANICE</b></p>

<p>1 { We oppose this mega-truck transportation project from beginning to end, but especially over Highway 12 as it will "re-brand" our Scenic Byway and All American Road along a Wild and Scenic River as an industrial truck route. The editorial in the Lewiston Morning Tribune, 5-13-10, says it all, "Nobody's asking you; they're telling you" that High and Wide is going to happen. Thanks to Montana for having a process for comment that may have some "teeth"; however, one gets the feeling that once again the 2nd largest/ richest corporation in the world will "run over" anyone/thing in its way. Roger and Janice Inghram</p>	<p>1. See response to Common Comment K.</p>
<p>Larry J Jackson POBox 1467 Lolo Mt 59847 Lcksn1@msncom 406-550-9192</p> <p>1 { I do not see any problem with this company going through our state We already have enough laws to protect our environment We dont need more laws or rules that would stifle any more companies from entering our state and not doing business It is just more OBSTRUCTIONISM This company has made plans for anyfor the moving of this equipment which will give some new but temperary jobes give us turn out where we should have had more anyway now at no cost to Idaho or Montana I say lets cotinue this project It will have a greater benefit to use all</p>	<p><b>JACKSON, LARRY</b></p> <p>1. Comment noted.</p>
<p>telephone on May 14, 2010, at 3:20 pm Brian Jamison Ravalli County, MT</p> <p>1 { Comment 1) Opposed to idea of super oil rigs moving through corridor. 2) Dangerous and unnecessary 3) That's my opinion, thank you.</p>	<p><b>JAMISON, BRIAN</b></p> <p>1. Comments noted.</p>
<p>Rita Jankowski-Bradley 510 E. Kent Ave., Missoula, MT 59801 406.544-9026, fax 406.721.4266, rjankowski_bradley@yahoo.com May, 13, 2010 Montana Department of Transportation MDT Environmental services Bureau PO Box 201001 Helena, MT 59620-1001</p>	<p><b>JANKOWSKI-BRADLEY, RITA</b></p>

Comments re: the Kearn Module Transport Project (KMTP) EA Control Number: CN 6800

NOTE: Comments prepared for submission after public hearing, question and comment period in Missoula, April 29<sup>th</sup> 2010, and Missoula City Council meeting May 10, 2010 and study and review of information during this time period. (4 page comment)

1 { To begin with, my understanding is that this is not a truly independent EA but paid for by the company and therefore for the benefit of Imperial Oil-Exxon/Mobil, not the people of Montana. A second truly independent assessment is needed. Montanans should not have to bear the financial burden.

2 { The potential adverse impacts of the project are significant. An immediate red flag goes out when the impact listed in the EA overview are all pre-determined as “**minimal to no**” environmental impacts. This should be challenged. Exxon has a history of mishap and contamination of waterways and fragile ecosystems. (As an example of the impossibility of such a guarantee, in a 2009 Environmental Impact Analysis, BP suggested it was “*unlikely or virtually impossible*” for an accident to occur that would lead to a giant crude oil spill and serious damage to beaches, fish and mammals.)

To state that there is only “*a slight risk of spill of contaminates or hazardous waste with minimal impacts*” is questionable. A load this large over mountain passes and river corridors has a high risk of an accident. One accident will wreak havoc on our rivers. Clean water is at a premium for life, quality of life, recreation, fisheries, wildlife etc...Montana’s wild and scenic rivers are irreplaceable treasures.

3 { I am not a structural engineer but I have grave concerns regarding the wear and tear on the life expectancy of the roads this project is proposing to utilize. Both the life expectancy from the narrow road, fragile shoulder, bridges, riparian damage from such massive length and weight is predictably extreme and considerable... The long term cumulative effects from deterioration will become a long term burden carried by Montana taxpayers and negate the short term money being proposed to benefit the state and to repair the roads. Because these are permanent modifications, the potential for extreme wear is also PERMANENT.

4 { Stating that the decision is based on following the Environmental Policy Act is one thing but our **constitutional right** (Article IX, Environment & Natural Resources), to a clean and healthful environment in Montana for present and future generations will be jeopardized if this permit is approved. Furthermore, our preamble states “We the people of Montana grateful to God for the quiet beauty of our state, the grandeur of our mountains, the vastness of our rolling plains, and desiring to improve the quality of life, equality of opportunity and to secure the blessings of liberty for this and future generations do ordain and establish this constitution.” This project jeopardizes the quality of our life, the quiet beauty, and replaces it with negative impacts on our

1. While Imperial Oil paid for the EA to be conducted, the firm that produced the EA is independent of Imperial Oil and the EA was reviewed and approved for publication by MDT as meeting environmental review criteria under the Montana Environmental Policy Act.
2. See responses to Common Comments H1, H2 and H3.
3. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs. See response to Common Comment L.
4. See responses to Common Comments R and I.

scenic by ways and river corridors and wildlife, fisheries and migratory birds, including the Eagles and other raptor population at Rogers Pass. Even in the unlikely possibility that there was never an accident, widening the pullouts to such an extent and other modifications needed for these super size vehicles are a negative impact.

5 { A 32 J permit for over dimensional, oversize loads were never designed for loads over weight, height and size of such magnitude. To have to relocate utility lines, traffic signal structures, modify for increased turning radius, etc. is indicative of this.

6 { Taking alternative routes through Montana (during late fall and winter) which are often icy, impassible due to slides, flooding, etc. would cause either accidents or more trucks to go through Montana during better conditions. Lolo Pass is dangerous in winter and Rogers Pass has record extreme weather conditions. If more trucks travel during more ideal conditions, this is an added burden to Montanans. At the public hearing officials said a 2<sup>nd</sup> push truck may be needed for Lolo and Rogers Pass. Under extreme conditions this may, in turn, add to the danger.

7 { Safety. Montana residents or tourists and other visitors requiring emergency medical attention could die because of these impassible transport modules blocking the road. As one woman stated “ten minutes more would have been too long and I would not be testifying here today.” Not all emergencies can wait for transport by emergency vehicles. For Imperial Oil to guarantee a ten minute maximum delay for the transport modules as the officials did at the public hearing is impossible. **Losing the life of one Montanan or other citizen**, from such an incident, is unacceptable!

8 { The route passes by some of Montana’s **Minuteman missile silos**. Montana has one of the largest stockpiles. If these transport module vehicles block traffic they could cause eminent danger in terms of safety for Montanans and the world at large

9 { Less traveled Montana roads, the same roads proposed for the Kearl Module Transport of equipment, are where late night accidents due to alcohol are a problem. This will only add to the tragedy.

10 { An accident would block traffic for long periods, perhaps days or weeks. There are no alternative routes for many Montanans using these roads for work or recreation.

11 { Economic impacts from risk to the rivers when a disaster occurs are difficult to cost. Many of the costs would be far greater than monetary. Lolo creek is Montana’s gulf coast. As a tributary of the Bitterroot it flows into the Clark Fork and would pollute clear to Lake Ponderosa. The Blackfoot is noted as a “Blue Ribbon River,” and damages would flow far downstream. The Dearborn River and other rivers could be damaged, as well. There is not much clean water on

5. Mont. Code Ann. Section 61-10-121, authorizes MDT to issue permits for loads exceeding the size and weight standards set forth in the statute. The permitting process includes special permits for utility work in the form of Utility Occupation and Agreement permits.

6. The Montana Transportation Plan contains contingencies for inclement weather. Module transportation would not occur under “extreme conditions”.

7. See response to Common Comment H3.

8. Consultation was conducted with the Air Force at Malmstrom Air Force Base, the agency responsible for the missiles. They did not indicate the module transportation or other work would affect their operations (Section 4.1.3 of the EA).

9. The module transportation will not contribute to the problem.

10. See responses to Common Comments H1 and H2.

11. See responses to Common Comments H1 and O.

the planet. Contamination is irreversible. The damage to wildlife (moose, bear, elk, sheep, etc), and jobs surrounding recreation and tourism would be disastrous to the state.

12 { Testimony by an economist at both the public hearing in Missoula and the City council meeting stated that impact and cost analysis was inadequate, incomplete. The EA assumed no job or business loss (tourism, recreation, outfitting, fishing, etc.). The EA assumed no big rig accidents, and assumed no federal dollars. A comprehensive report is necessary that addresses all the costs to taxpayers, workers, earnings lost, etc.

13 { Support vehicles, emergency disaster vehicles and necessary equipment large enough to deal with an accident were not properly addressed.

14 { If this project is allowed which I am not in favor of, the State of Montana needs to guarantee that the citizens will not bear any adverse burdens from any disaster or long term damages. To guarantee this a significant amount of money, I would propose \$2 Billion US to be put in a bond account by Imperial—Exxon/Mobil for the state to access without question so there is no costly delays in clean up remediation or from persons injured or kept from emergency care due to delays in obtaining medical care in the event of a medical emergency or accident related to this project. There should also be a fund to support legal fees related to damages for use by Montanans.

15 { Energy technologies/clean energy. I am against this project because Montana should be not risking safety, economic burdens, and/or environmental damages from indirect support for dirty energy when Wind, Solar, and other renewable projects should be supported in Montana. Montana has experts in renewable energy. The document of chief import to Montana’s Energy needs is AERO’s *Repowering Montana: A Blueprint for Homegrown Energy Self-Reliance—How all of Montana’s power needs can be met using conservation and clean, renewable energy while creating jobs, saving money, and revitalizing rural and urban communities* ([www.aeromt.org](http://www.aeromt.org)).

16 { Montanans do not need to carry the burden for shortsightedness about the future of life on the planet. The tar sands have already caused destruction of irreplaceable boreal forests (perhaps source of natural cures to industrial caused problems). The tar sands produce less energy than used and contribute a tremendous carbon impact when climate change science requires a reduction in carbon if life on the planet is going to exist as we know it.

17 { It is a tragedy, the sacrifice of indigenous Chipewyan peoples who are dying or suffering from cancer and other ailments due to pollution of the Athabasca River from the Tar Sands. As a Montana citizen, I do not want to contribute to this tragedy which will only be exacerbated with continued Tar Sands development.

12. See responses to Common Comments M, L, H1, H2, and H3. No federal dollars would be involved in the project.

13. See responses to Common Comments H1 and H2.

14. See response to Common Comment L.

15. Comment noted.

16. Comment noted.

17. See response to Common Comment E1.

- |    |   |   |  |
|----|---|---|--|
| 18 | { | There are other feasible routes available. The current route from Port of Houston for transport of oversize loads for Alberta tar sands projects already exists. When Imperial/Exxon Mobile says this is the least expensive it is because they are <b>not weighing the long term, down stream externalities in the cost analysis</b> . Montanans should not be subject to such potential loss when other alternative routes and energy technologies that are less dangerous are available.   | 18. See response to Common Comment D1.   |
| 19 | { | It is a fact that no matter whether the permit is asking for a High and Wide Corridor or not, this is what Montana will have. Future requests are assuredly guaranteed once such roads are altered and available.   | 19. See response to Common Comment K.  |
| 20 | { | The route goes through forest service land, therefore NEPA should apply. Additionally, if highways are being rebuilt in the future, federal dollars will be used. This changes the parameters beyond state rules.   | 20. See the response to Common Comment A.  |
| 21 | { | A review needs to be conducted under the National Historic Preservation Act for federal lands subject to secondary and cumulative impacts to archaeological & historic sites along the route. Also, full surveys with shovel testing on the extra wide pull outs to protect unknown cultural resources before they are destroyed. Also full review under the Federal Highways Act for those portions of the route that are indeed federal highways, Interstate 90 & 15 and US 93 & 287.   | 21. A cultural survey was done on the portion of Highway 12 crossing the Lolo National Forest where ground disturbing activities would occur. See Section 4.1.1.2 of the EA.   |
| 22 | { | According to my reading of class 2 permits for 32-J, the vehicle loads may be moved only during daylight hours, from sunrise on Monday until 3:00 pm on Friday. Because the state determines it is in the best interest to change the times for the Kearn Module transport, it seems that allowing weekend travel goes beyond intended benefit to the public (officials stated ~ 1 vehicle per day at public hearing).. IN FACT, none of this is truly to the benefit of Montana, except for a few short term jobs at the risk of long term economic burdens that Montana cannot afford to bear. This is plain old common sense—of which Montanans are proud. | 22. Pursuant to ARM 18.8.1101(13)(g), MDT may authorize travel at other times, including nighttime. In this case, the nighttime travel minimizes inconvenience to the traveling public and enhances traffic safety (see Section of 2.3.3 EA) No weekend travel is proposed or planned. |
| 23 | { | The EA allows for citizen and groups voices. Our comments of concern should not just serve protocol but should be listened to carefully for the concerns re the impact of this project. I believe we matter; it is our state and our duty to protect its scenic rivers, wildlife and quiet beauty for generations to come. Many youth testified about their fear for the state they love and plan to live in for a lifetime and to raise their families here. Future generations are Montana’s future.  | 23. Comment noted.   |
| 24 | { | Please deny the permit. At the minimum please submit to a federal Environmental Impact Statement to take into full account all the damages that Tar Sands mining generates. Common sense dictates an EIS when such a request requires higher scrutiny. The current assessment is insufficient.  | 24. See responses to Common Comments A and E1.   |
| 25 | { | There has not been enough time for citizens and groups to comment. In reality, the 30 day period was only a 15 day period because only with enough information generated at the public hearing did we have time to act.   | 25. See response to Common Comment F1.   |

Thank you for your consideration.  
Rita Jankowski-Bradley  
Missoula, MT

1 { **I urge you to consider *all* environmental impacts of tar sands development-especially its contribution to global warming before you issue a permit to transport this MASSIVE equipment across western MT and into Canada.**

**Sincerely,**

**Gerry Jennings 317 Fox Drive; Great Falls, MT 59404**

**JENNINGS, GERRY**

1. See the response to Common Comment E1.



*Norman W. Johnson, PLLC*

*Certified Rehabilitation Counselor & Board Certified Vocational Expert  
PO Box 1656, Polson, MT 59860-1656 406 883-0398 Fax 406 883-0298 Cell 406 249-5303*

April 29, 2010

Re: Testimony

Imperial Oil/ExxonMobile's plan to move 200 over height, over width, and overweight loads from Lolo Pass to the Port of Sweet Grass over a 12 month period starting fall 2010, for twelve months, during the evening and early morning hours.

Dear Reader:

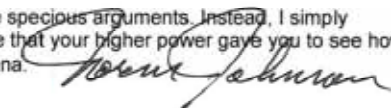
I am in favor for this action for a number of reasons.

1. The 53 new highway turnouts and 22 existing turnouts that will be enlarged will be a boon to the traveling public to use for emergencies, snowplow pull offs, cell phone usage, for tourist pull outs for scenic photos, a place to watch wildlife, and to care for young children and infants. Hopefully, these will contribute to slowing tourists so they will spend more time and money in our state.
2. At least 100 flaggers and pilot car drivers will work year round to Sheppard these loads through Montana. These workers will earn Davis-Bacon Act wages which vary based on zones from the dispatch city but will run from at least \$17.18 per hour to \$21.98 per hour for flaggers and \$19.97 to \$24.77 per hour for pilot car drivers. Plus, per diem and fringe benefits.
3. These 100 flaggers and pilot car drivers will consist of a number of high risk members of society such as: single women trying to support their families; disabled and handicapped workers who can only perform work with a physical capacity rating of sedentary to light; minority group members from various Montana tribes who are experiencing unemployment rates in excess of 25% on their home reservations.
4. From 1980 to 1982 huge equipment was transported from Billings to Coal Strip to finish up the power plant construction. Today along I-94 the pullouts constructed around each overpass is only visible to the knowing eye and many times even I cannot tell where they once were.
5. The oil produced in the oil sand fields of Alberta is destined to be piped to the Cenex refinery in Laurel which will produce good paying jobs in that Montana community.

Typically, when folks from western Montana oppose something they use the environment as a handy argument. In other words, they claim that an activity will harm the flora and fauna, kill off the bull trout, destroy the salmon, ruin the scenery, pollute the air, wreck the view etc. It is simply disgusting that folks would stoop so low. We all want to protect our environment.

Using the same techniques as the so called protectors of the environment I could characterize those who opposed this project as being anti-family as they are destroying good jobs that families rely on to support themselves. I could go one step further and say that those who are in opposition are discriminating against the disabled and handicapped as they would more than likely be the recipient of many of these jobs. And of course not to be outdone by current ruling junta in Washington D.C., I could claim that everyone who opposes this project is racist as many Native Americans will more than likely be employed on this job.

However, I am not going to use any of those specious arguments. Instead, I simply recommend that you use the common sense that your higher power gave you to see how this program will be a long term benefit to Montana.



**JOHNSON, NORMAN**

1. Comment noted.

1

1 { 30 days is not enough. More time needed. Please, please extend the period.  
Wayne

**JOHNSON, WAYNE**

1. See the response to Common Comment F1.

To whom it may concern:

**JONES, DAVE**

Having read the proposal, some of the opponent's view points and some of the proponents view points, I have to side with the opponents.

1 { While the economic benefits of this project are real and needed in these hard economic times, the risk, uncertainty and long term impacts to the Western Montana river and stream systems are not being considered adequately in my view. We have a large interstate highway system in this state that is designed for long haul operations such as this. The company proposing this project is interested in the lowest cost alternative only and the chosen route represents that choice.

1. See response to Common Comment O.
2. See response to Common Comment D2.

2 { Reject the proposal and retain the long term integrity of the Blackfoot and Lolo waterways.

Thank you,  
Dave Jones  
212 Sentinel

Greetings,

**JUDY, BETH**

1 { I'd like to express my opposition to moving equipment for the Tar Sands work in Canada through Montana. It's one of the most environmentally degrading processes in the world, and we are trying to stop global warming, not make it worse. It's going to tie up our roads, and for what? For greed, degradation, and a shaky future for humans. Please address these impacts before issuing any permits.

1. See responses to Common Comments E1 and P.

Thank you.

--  
Beth Judy  
718 Vine  
Missoula, MT 59802

To: [mdtcommentskearl@mt.gov](mailto:mdtcommentskearl@mt.gov)

Hello, I'd like to add to comments I made earlier.

I am concerned that the current EA does not adequately address concerns about fish, animals, plants, and archaeological or historical artifacts along the route that these huge shipments would take.

- 1 { If there is already a route available that would not go through Montana, I would prefer that the shipments continue to stay on that route.
- 2 { If the route does go through Montana, I would hope that the bond would be high enough to take into account more than just construction/engineering values of the road itself, but additional economic values--impacts on tourism from any accidents or Montana losing value as a destination for any reason. Negative impacts on wild lands, scenery, ecosystems. People's time when they are held up by an accident involving the equipment. Impacts that we aren't evident
- 3 { now, but that we may be left with.
- 4 { I don't welcome this kind of traffic. It seems like if we establish this route, other companies may use it as well, since there are many projects in the Tar Sands experimenting with all kinds of new technologies. I would wish for Montana not to become a pass-through state for that industry.

Exxon/Imperial also does not seem like a trustworthy partner, if there were any problems. They have reneged on promises to much bigger "fish in the sea" than our lightly populated, economically poor state.

Thank you.

--

Beth Judy  
 718 Vine, Missoula  
 406-728-4711

**JUDY, BETH**

- 1. There are no current routes through Montana for these loads to use.
- 2. See response to Common Comment L.
- 3. See responses to Common Comments G, I, and J.
- 4. See response to Common Comment K.

Public comment taken over the telephone on May 14, 2010 (2:30 pm) from:

Gary Kahl

5005 Pattee Canyon Road

Missoula, MT 59803

- 1 { 1) Concerned about project, environmental aspects, current disaster in making, facilitating a bad idea.
- 1 { 2) Has problem with MT participating in such project using our highway system, conflict with other users, especially with an accident and believes an accident is inevitable.
- 1 { 3) Large potential for disaster.
- 2 { 4) Have Exxon post millions for dealing with potential disaster.
- 2 { 5) Exxon would rather fight than step up and pay for damage.
- 2 { 6) Don't know what MT has to gain from facilitating this project, MT has much to lose and not much to gain.
- 3 { 7) What does our state or our nation have to gain?
- 3 { 8) Why facilitate or enable this to happen?
- 3 { 9) Let Korea and Canada figure this out and not involve the US transportation system.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Donald E. Kiely

Missoula, MT 59801

406 721-0311212 Sentinel

Missoula, MT 59801

406 721-0311

**KAHL, GARY**

- 1. See response to Common Comment G, H1, and H2.
- 2. See response to Common Comment L.
- 3. Comments noted.

**KIELY, DONALD**

Form Letter 1

- 1. See response to Common Comment C2.
- 2. See response to Common Comment D1 and response to Common Comment D2.
- 3. See response to Common Comment M.
- 4. See responses to Common Comment A.

1 { I am concerned about the huge equipment that may travel over our roads on its way to Canada for the Tar Sands. Dev. Although I love Canada and her people this is a dangerous undertaking. I'm asking that you prepare a full environmental impact statement before proceeding.

Mollie Kieran  
 Libby, MT  
 Molly Montana  
 Molly Montana Real Estate  
 406-293-2934 office  
 406-293-3407 fax  
[molly@mollymontana.com](mailto:molly@mollymontana.com)

**KIERAN, MOLLIE**

1. See response to Common Comment C.

**Dear Montana Department of Transportation ,**

I am concerned about the creation of a permanent “high and wide” industrial corridor along some of Montana’s most scenic river ways. The environmental analysis of the Kearl Module Transportation Project must not be limited to this one-time proposal since it is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands.

**Please:**

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts.

b.kneefe  
 missoula, mt

**KNEEFE, BERNIE**

Form Letter 1

1. See response to Common Comment C2.
2. See response to Common Comment D1 and response to Common Comment D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

Voicemail comment received by me today from Marian Koch.....

1 { I am calling on this big rig deal. I am definitely against it. I am afraid it is waiting for an accident to happen. Thank you very much.

Marian Koch  
 Missoula, Montana

**KOCK, MARIAN**

1. Comment noted.

To whom it may concern:

1 { I am writing to voice my strong opposition to the proposed Kearsarge Module Transport Project. I understand that the project would require major changes to road infrastructure, albeit at Exxon Mobil's expense, and would create at best a nuisance and at worst a safety hazard to the public. The potential environmental risks to such a famously scenic area are just too high. It seems to me that the significant, lasting benefits of this project would all accrue to Exxon Mobil, while the significant lasting risk is all footed by the public, and we need look no further than the Gulf right now to see that is a terrible proposition. Different industry, different specifics, but the same principle.

I urge you to put the interests of Montanans, present and future, first and reject this proposal.

Sincerely,

Emily Kodama  
823 Defoe Street  
Missoula, MT 59802

**KODAMA, EMILY**

1. See responses to Common Comments G, H1, H2, and H3.

Dear Mr. Martin,

1 { Please accept this message as a positive vote on allowing the Modules to move through Montana. The extreme environmentalists have only one agenda, and that is to stop all fuel and coal production. Their claims of environmental damage from moving these rigs is baseless and ridiculous. The cry baby fishing guides think they own the rivers and highways of Montana, yet they actually contribute very little to Montana's economy. They have already helped destroy one of Montana's best paying industries, gold mining, so please don't let them hold up progress on this worthwhile project.

I am a third generation Montana mining employee, with considerable experience in the devastating effects extreme environmentalism has had on Montana's economy and jobs. As your studies so far have shown, this project has little, or no, affect on the environment. Please proceed.

Thank You,  
Jerry Koon  
50 Poison Patch Rd  
Hall, MT 59837  
406-288-3626

**KOON, JERRY**

1. Comment noted.

Dear MDT:

1 { I am unable to attend the public meetings but wish to register my dismay over this proposal to open up Western Montana for what will undoubtedly be years and years of shipping this enormous equipment over our narrow roads and through some of the most gorgeous and sensitive areas of our state. Exxon-Mobil can spend extra money and simply ship using other, safer routes.

2 { I recreate regularly on the Clearwater and Lochsa Rivers and work for USGS up the Blackfoot River doing water surveying from May through October. The prospect of these rigs coming over Lolo Pass and down through Missoula and then up the Blackfoot strikes me as one of the least supportable ideas in a long time—and the building of more and bigger turnouts every few miles (oh, and burying a few overhead lines) is one bribe we don't need and shouldn't take.

3 { I will readily admit that I am horrified (on self-evident ecological grounds) by this Alberta Tar Sands project, but I am here basing my strong objections to this transportation proposal on the intrinsic beauty and integrity of these river corridors, their narrow two lane roads and the absurd notion that we in Montana must move heaven and earth (certainly earth!) to accommodate every corporate whim (even while another such plays out in slow motion down in the Gulf).

4 { At the very least, there should be the fullest of environmental reviews and a great deal more time taken in considering all this—or I am afraid we will all suffer for a too-hasty acquiescence.

Respectfully,  
Michael Kreisberg (244 So. 2<sup>nd</sup> St. W., Missoula MT 59801)

1 { Imperial Oil/ExxonMobil should keep to their existing route. If we open Montana roads to them, there will be more companies wanting to do the same and there will be an endless parade of oversized rigs running down our roads. They'll increase and slow traffic, damage roads and decrease our air quality. Please do not allow Imperial Oil/ExxonMobil passage through Montana.

**Holly Kuehlwein**  
Missoula, Montana

Hello,

1 { I just want to make sure it is known that my wife and I are AGAINST the modules.  
We fear it is taking advantage of a pristine area, and the risk is not worth the reward to Montana.  
Please do NOT issue this permit.

**KREISBERG, MICHAEL**

1. See response to Common Comment D1.
2. Comment noted.
3. See response to Common Comment J.
4. See response to Common Comment B

**KUEHLWEIN, HOLLY**

1. See responses to Common Comments G, L, and K.

**KUHNLE, DAVID**

1. Comment noted.

Thanks  
 David kuhnle  
 2620 woodland ave.  
 missoula , mt 59802

Hello Sir/Madam,

I just wanted to make a comment about the Oil company's plan to move large modules across Route 12 and hwy 200.

My name is David Kuhnle  
 2620 Woodland ave.  
 Missoula, MT 59802

1 { I DO NOT approve this plan. I don't understand how an oil company can make changes and threaten our highways. These module loads could be easily transported up the Columbia by barge, then transported that way. I don't believe it is safe or acceptable to have these large loads transported on narrow roads like route 12 and hwy 200. These roads were never designed to have loads like these, and the danger to the public is what is my greatest concern.

I hope you all can see the public does NOT want this.

Good luck, thanks

David

**KUHNLE, DAVID**

1. See response to Common Comment G.

1 { Don't allow this beautiful and scenic wild river corridor to be ruined by altering it to allow these enormous vehicles to use it.

2 { Normally I am all for anything that would have a positive impact on the economy, but in this case i will make an exception.

2 { There are other routes that these vehicles have used to transport the machinery to the oil sands of Canada. Use those instead.

Richard Kuschel  
 rhk@therecordingcenter.com  
 I canna' change the Law o' Physics-Scotty  
 The Recording Center  
 118 W. Pine St.  
 Missoula, MT 59802  
 406-721-4172

**KUSCHEL, RICHARD**

1. See response to Common Comment J.
2. See response to Common Comment D1.



Dear Mr. Martin,

My comments on this project are more in the form of questions. My family and myself have quite a few concerns about this project, but none of us were able to make it to the public meeting last night. Some of my questions stem from what was reported in the Missoulian this morning.

My first question is in line with the question posed by Robbie Liben of Missoula last night.

1 { What is the company's plan for accidents, not only for those individuals involved, but also for the wildlife/environment? The Missoulian reported that Imperial Oil reassured the public that an accident (or incapacitated rig) would not happen. Even the best drivers are subjected to conditions beyond their control, such as weather, wildlife and other drivers. A transport of this magnitude can do severe damage to anyone or anything unable to get out of the way including the environment.

2 { Is Imperial Oil also proposing routes in Canada? The end product will be used in Canada, why not use a Canadian port, roadways and railways to transport? Why are the shipments coming through the United States? Is it cheaper to deal with the U.S. than it is Canada?

3 { In an effort to avoid the "not in my backyard" mentality, would the use of the established freeway system be better? I understand that the transports may not fit under the overpasses and the transports would have to exit and enter the freeway again. However, would that be safer for other drivers? Is the freeway system better equipped to handle these heavy loads?

Thank you for receiving my questions.

Sincerely,  
 Jona A. Lagerstrom  
 2070 Cooper Street  
 Unit 221  
 Missoula, MT 59808  
 406-549-8969

**LAGERSTROM, JONA**

1. See the responses to Common Comments H1, H2, and H3.
2. See the response to Common Comment D1.
3. See the response to Common Comment D2.

1 { Please consider the incredible environmental impact that the tar sands are having and will continue to have on the ecosystems of Canada, USA and the planet as a whole. The Alberta tar sands are hugely wasteful of Nature. The energy used to extract what has become a poison to the earth is massive. The resources needed to have begun and to maintain what is surely an obsolete technology does not warrant the tar sands' contribution to environmental destruction. Please, please do not narrow your vision to "but we need the oil". Consider ALL of the environmental impacts of this project. It's wasteful in its process. It's massively polluting on a planet that cannot take any more of this "growth". And the idea that we can safely use public scenic two-lane roads without

**LANDINI, RICHARD**

1. See response to Common Comment E1, H1, H2, and J.

<p>1 { catastrophe to rivers and public service is not reasonable. I do not want this destruction-for-oil on our public roads. I do not support the Corporate Profit made at our public infrastructure's expense. PLEASE</p>	<p>See previous page.</p>
<p>Dear Sir,</p> <p>1 { I have looked at the EA for the proposed KMTP. Although I do not live along the direct route, I oppose this project.</p> <p>1 { I am a frequent visitor to the Lochsa river drainage. I cannot see the safe passage of these vehicles along this corridor.</p> <p>1 { Please do not allow this company, from another country, take advantage of our beautiful countryside.</p> <p>Jeff LaPlume 156 Trailridge Rd. Kalispell, MT 59901</p>	<p><b>LAPLUME, JEFF</b></p> <p>1. See response to Common Comment E2.</p>
<p>Dear MDT,</p> <p>1 { As a native Montanan and an informed citizen I wanted to contact MDT. I strongly object to the approval of this permit. this is not only because of the significant risk to everyone traveling the roads during while this MASSIVE equipment is being transported but also because of the environmental and public heath issues it poses.... Montana can not afford to turn it's head to these issues....</p> <p>Thanks for your time Sincerely Matts Larson</p>	<p><b>LARSON, MATTS</b></p> <p>1. Comment noted.</p>
<p>I am writing to STRONGLY object to the hauling of massive tar sands drilling equipment through Montana to Alberta! PLEASE consider:</p> <p>1 { 1. the cummulative and irreversible environmental and health impacts of tar sands mining:</p> <ul style="list-style-type: none"> <li>- the harm to water quality</li> <li>- millions of metric tons of greenhouse gases</li> <li>- excess levels of harmful particulates that impair air quality</li> <li>- the clearing of old growth forests</li> </ul>	<p><b>LEE, BONNIE</b></p> <p>1. See the response to Common Comment E1.</p>

<p>2 { 2. the future effects of developing this high and wide corridor across our state</p> <p>THANK YOU for your attention! Bonnie Lee Missoula, MT</p>	<p>2. See response to Common Comment K.</p>
<p>1 { As a member of the Missoula community since 1972 and a Missoula resident homeowner since 1980, I wish to speak out <b>against</b> the proposed hauling of over-sized mining equipment through the Missoula area. It seems ironic and hypocritical that we would allow mining companies to so abuse a town where the population has often voted against mining interests and in favor of the environment. I see little to be gained and much to lose for our community in this ill-advised endeavor. Please tell Exxon Mobil and Tar Sands that they need to find another route over which to haul their earth-raping equipment. Thank you for listening.</p> <p>Robert Lee 1045 S. 1st W Missoula MT 59801 406 721-3814</p>	<p><b>LEE, ROBERT</b></p> <p>1. Comment noted.</p>
<p>1 { Dear Mr. Martin I am 100 % support of the Kearl Module Project – We need more jobs in Montana. Thanks Danielle Lehman GasesPlus Norco LLC 899 Parkway Lane Billings, MT 59101 <b>1-406-252-5339</b></p>	<p><b>LEHMAN, DANIELLE - GASESPLUS NORCO LLC</b></p> <p>1. Comment noted.</p>
<p>1 { Whoa on this! A permanent 'High &amp; Wide' corridor alongside some of Montana's finest streams and through ecologically important wildlife habitat? And only an EA? That's like solving the potential for hazardous spills into Flathead Lake by posting "Report bad driving signs".</p> <p>2 { At least have an EIS conducted, then read it, then have public meetings on it and carefully examine all the negative impact this 'corridor' will have for western Montana's quality of life. If it's as severe as I suspect, then SAY NO!</p> <p>Respectfully,</p>	<p><b>LEHNER, PHIL</b></p> <p>1. See response to Common Comment K.</p> <p>2. See response to Common Comment B.</p>

Phil Lehner  
Polson

Dear MDT,

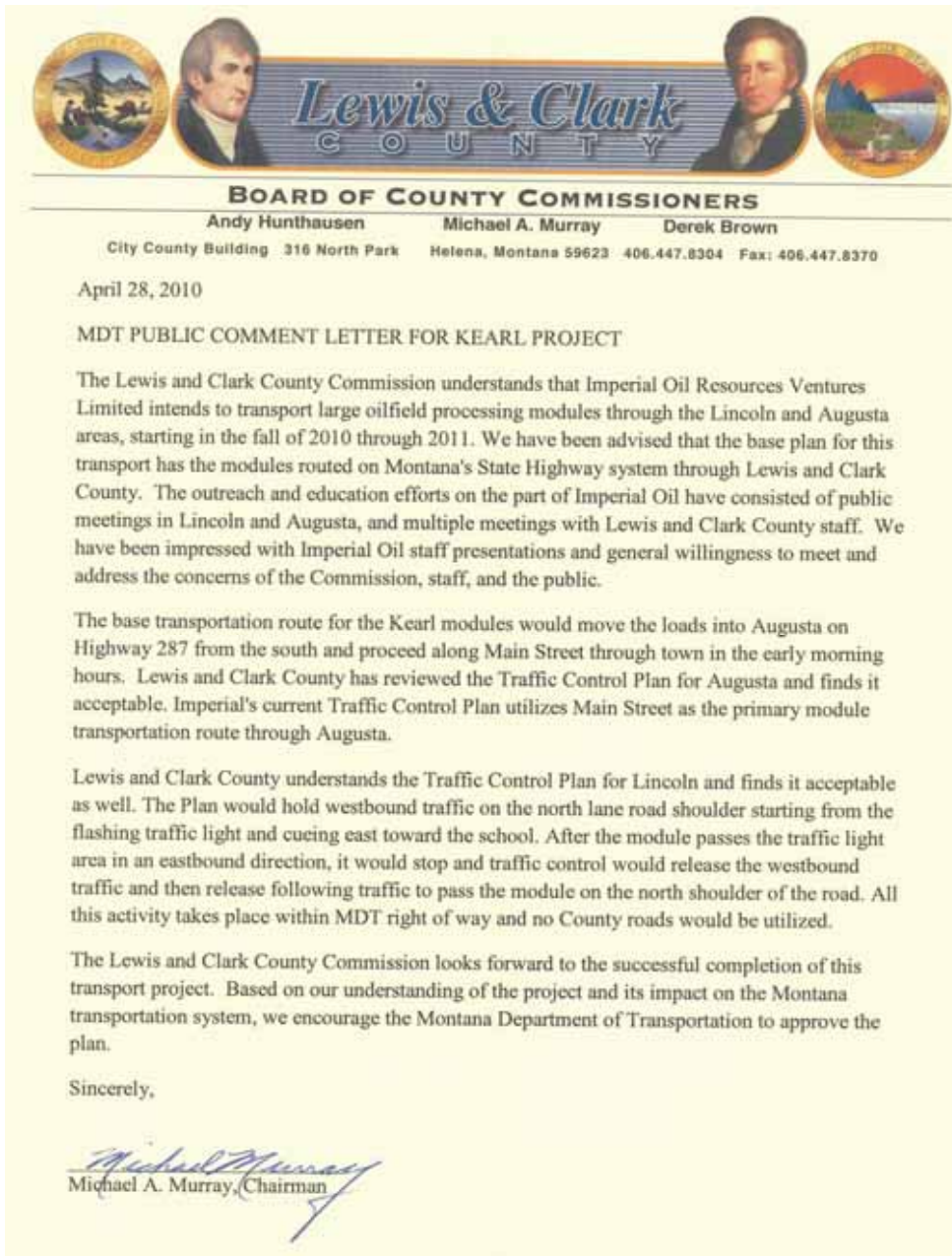
1 { I am writing object to allowing Imperial Oil Co. to haul greatly oversize loads of  
equipment over Montana highways. No matter what Imperial Oil claims, this will  
2 { disrupt traffic and possibly the movement of emergency vehicles. This is unacceptable  
because it makes Montana roads more dangerous. I imagine the equipment is being  
3 { constructed overseas. Why not construct it in Canada or somewhere closer and keep the  
money here instead of giving it to the Koreans? Finally the whole tar sands project  
seems like an environmental disaster waiting to happen.

Thank you for considering my concerns.

Peter Lesica  
929 Locust  
Missoula, MT 59802

**LESICA, PETER**

1. See responses to Common Comments G and H3.
2. See response to Common Comment D3.
3. Comment noted. E1



1 {

**LEWIS AND CLARK COUNTY**

- 1. Comment noted.

1 { Know one seems to care about us homeowners on the Blackfoot River on hwy 200 from Milltown to Patomac.

It just never ends.

2 { Now this. Most of the homes on the Blackfoot river on hwy 200 are small properties in width. 150ft from the flood planes. Many are long but very narrow and almost to the Hwy. From Milltown to Bearcreek Rd. the problem exists. So no matter where you put a turn out it is going to effect a homeowner. A turnout is going to create a real disaster for any of the homeowners along this section. Not really from the Big Rig but the long effect of that persons home and property. This will be putting traffic and the big rig right in our back or front yards. Not to mention all the construction on the Electrical wires (which are many). And when this project is over it will leave us to deal with the problems to be created from traffic in the turnouts.

After your project is done there will be a devistating effect for those of us who have narrow lots along the river. If there is a turn out near by it will create another meeting place for the party goers. (by the way our police coverage usually has to come all the way from Missoula)

Hwy 200 gets pretty noisy from the traffic for those of us who live along Hwy 200 from Bonner to Potomac, but it ends around 12 a.m. and we are than able to go to sleep. Unless there is a kegger party on the weekend. So I guess now we will have to be awake all night long. Every night for a whole year. Real nice.

3 { Please I have a request - please do not put a turn out at Gold Creek Road, this will harm 14 homes plus the residents up Twin Creek Road. We already have to put up with so much from the parties and traffic and other issues. Please do not make it worse for us.

4 { This year we get to spend time writing to you, by the way I finally figured out after 2 hours how to get to this site. Last year we had to fight River Set Backs. I do not understand, how they can control our property about River set backs and then turn around and tear up the roads, put underground utilities, etc. all along the river with only 200 feet to the Hwy, and on the bridges over the river. This state does not make any sense.

5 { Don't forget to tell the residents from Bonner to Clearwater Junction that they cannot be injured or get sick or have their home catch on fire while all this is happening.

**LGLAFFFF@YAHOO.COM**

1. MDT does care about homeowners and the travelling public. The impacts have been identified.
2. For the noise assessment, the park/extended park turnouts (new or existing) were reviewed to see if they were within 500 feet of a residence. None of the parking/extended parking turnouts on Hwy 200 are within 500 feet of a residence. There are a total of 8 new turnouts on Hwy 200 on the approximately 86 miles between Bonner and Rogers Pass. Of those, 6 turnouts are clearing turnout which were not reviewed for their proximity to residences because their use by modules will be less than 10 minutes at a time. They are located at mile posts 43.0, 47.2, 52.3, 70.1, and 77.9. Of these, the turnout at 70.1 is the closest to any residence at 430 feet. This turnout is 1/4 mile from the Blackfoot river. The construction width of the clearing turnouts is 10 feet. None of the new turnouts are within a floodplain. Noise levels from module transportation will be similar to current commercial use on the highway.
3. Twin Creek is near MP 9, the closest turnout with any work proposed is just past MP 12 (a new turnout).
4. Comment noted.
5. See response to Common Comment H3.

1 { I oppose Imperial Oil/Exxon Mobil's request to run through 200 grossly oversized vehicles through Montana. This will have negative impacts on our environment, our citizens, and our roadways ... with no significant benefit to our state.

Tom Likens  
Helena, Montana

Dear Montana Department of Transportation:

As someone who grew up with the Blackfoot River in my backyard, and having helped fight--and win--the legal challenge to protect the Blackfoot River from the proposed giant cyanide heap leach gold mine proposed for the headwater of the Blackfoot--the case is MEIC v. DEQ, I am compelled to vehemently oppose jeopardizing one of Montana's most treasured rivers and river corridors. Not only is the Blackfoot a treasured recreation area, but it provides critical habitat for many species--aquatic life and wildlife. It is also one of the primary routes to West Glacier from Missoula and Helena, and provides critical access to the Bob Marshall Wilderness.

1 { Making Highway 200 a superhighway for transport of behemoth industrial equipment would jeopardize not only the scenic beauty and habitat the Blackfoot River provides, but it would more than likely result in adverse economic impacts to small communities, and to Montana's overall tourism and recreation industry.

2 { I am concerned about the creation of a permanent "high and wide" industrial corridor along some of Montana's most scenic river ways. The environmental analysis of the Kearl Module Transportation Project must not be limited to this one-time proposal since it is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. **Please do the following:**

- 3 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 4 { • Require real alternatives to be considered;
- 5 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 6 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts.

Thank you for this opportunity to comment.

Sincerely  
Brenda Lindlief-Hall  
Reynolds, Motl & Sherwood, PLLP  
401 North Last Chance Gulch  
Helena, MT 59601

**LIKENS, TOM**

1. Comment noted.

**LINDLIEF-HALL, BRENDA**

Form Letter 1.

1. See responses to Common Comment M.
2. See response to Common Comment K.
3. See response to Common Comment C2.
4. See response to Common Comment D1 and response to Common Comment D2.
5. See response to Common Comment M.
6. See responses to Common Comment A.

(406) 442-3261  
 (406) 443-7294 (fax)

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { { Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { { Require real alternatives to be considered;
- 3 { { Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { { Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

**LITTLE-STARRATT, DEBRA**

Form Letter 1

1. See response to Common Comment C2.
2. See response to Common Comment D1 and response to Common Comment D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

May 3, 2010

Tom Martin  
 MDT  
 P.O. Box 201001  
 Helena, MT 59620  
 Mr. Martin:

We are writing to express our concern about allowing mining equipment to travel on Montana highways for 350 miles en route to Alberta. Besides the obvious safety concerns and travel disruptions, we are concerned about the broader implications of enabling tar sands development.

2 { Tar sands mining is devastating to the environment and to climate stability. It produces 108-125 million metric tons of greenhouse gases each year, requires logging of old growth forests, and damages water and air quality.

3 { We urge you to prepare a full EIS to assess the long-term cumulative effects of tar sands development and its contributions to global warming - effects all the citizens of Montana will have to live with.

Thank you.

Kathy Lloyd and Drake Barton  
 503 State Street

**LLOYD, KATHY AND DRAKE BARTON**

1. See responses to Common Comment E1, H1, H2, and H3.
2. See response to Common Comment E1 and P.
3. See response to Common Comment B, P, and E1.



Helena, MT 59601  
406-449-6586

Montana Department of Transportation,

1 { I and those I represent, Lewis and Clark Trail Adventures and the 543 members of the Lochsa River Conservancy demand with all due respect that the hearing process be lengthened to at least 90 days due to the length and breadth of the EA.

2 { We also request that a comprehensive EIS be completed on the state and federal levels because this goes beyond a single project, it is the opening of a permanent high and wide corridor.

3 { The EA does not sufficiently cover the "what if" situations and blindly rules out the case of any accidents through corporate egocentricity. Although the KMTP officials may have driven through the state a handful of times that doesn't mean they know all challenges and scenarios that may be presented.

4 { By choosing not to acknowledge the beginnings and ends of this project MDT is making a statement of helpless ignorant compliance. MDT employees are public servants to us the citizens of Montana and we want more detailed alternatives, more thorough analysis and the time to digest it.

The following web link and attached documents are lists of roughly 200 signatures opposing the project along the Lochsa River in Idaho. Although these petitions are not directed to the Montana portion of the KMT Project it is safe to say that the undersigned sentiments exist on both sides of the border. These signatures must not be ignored because a majority of them are Montana citizens, the people whose taxes pay MDT salaries.

petition link:

<http://www.petitiononline.com/lrmi68/petition.html>

We would also appreciate being kept in the loop on future extensions and occurrences within the department pertaining to this and similar projects to save all of those involved time and money by not prompting FOYI requests.

5 { My name is Jim Hepburn. I am a born and bred Montanan, a U of M alumni, construction worker, outdoorsman, and a whitewater raft guide.

I am here to represent the Lochsa River Conservancy. A public interest group that I formed in response to the Kearl Module Transport project and the detrimental effects it

**LOCHSA RIVER CONSERVANCY – JAMES HEPBURN**

1. See response to Common Comment F1.
2. See the response to Common Comment B and K.
3. See the response to Common Comment H1, H2, and H3.
4. See responses to Common Comments E1, E2, D1, D2 and D3.
5. Comment noted.

and its precedent will have on the social and natural environments of the Lochsa River corridor.

I am also here on the behalf of Lewis and Clark Trail Adventures, a Missoula based outfitter owned by Wayne and Gia Fairchild that has been operating on the areas rivers and trails for over 20 years.

For over 2 years the KMT project has been limited to whispers between select government officials and corporate representatives.

It has not been until recent that those affected most have been notified.

6 { By ignoring local communities and businesses the KMT project has literally been set up to pass with precedence under the cover of darkness.

Individual projects like the KMT project may be finite but, an amassing list of other interested companies unveils an open ended ticket to similar future use.

7 { The Emmert Coke Drum project is already slated to move 4 similar modules at the same time as the KMT project.

8 { And just yet, the Port of Lewiston is planning to expand sizably, enhancing its capability to receive mass amounts of this lowest-bidder foreign made equipment destined for oilsands, wind power, and coal projects throughout intermountain North America.

9 { Proponents of the KMT project boast that jobs will be created in Montana on its behalf but, besides a few temporary construction jobs and a few gas and lodging sales to truckers, the livelihoods of many Montanans and Idahoans will be negatively affected. Especially those who depend on the lands surrounding the KMT project proposed route.

If Imperial Oil, Exxon Mobil, Emmert or any other corporate behemoth want to make jobs in Montana, Why not build it here?

Instead it seems as though Montana is merely a meager means to big profit by way of efficiency.

I understand that sacrifices must be made for our way of life but, that goes for both sides. When does off limits mean off limits?

10 { State and corporate officials claim that this is the only feasible route but, a January 2009 Canadian Sailings article details the successful movement of a 400 ton module through Thunder Bay, Canada to the Kearl Oils sands. We want detailed alternatives.

The majority of individuals and businesses I have spoken to along the route oppose the

6. See Section 4.0 in the EA. Consultation has been ongoing since September 2009. The KMTP EA was made available for public review.

7. The ConocoPhillips coke drums are not currently scheduled to move at the same time the KMTP would be moving modules.

8. Comment noted.

9. See response to Common Comment M.

10. This route is much longer than the proposed KMTP route including the ocean trip.

KMT and similar projects. I have gathered an estimated 300 signatures in opposition to the KMT and similar future projects in the Lochsa River corridor.

11 { By allowing the foreign modules of the KMT project to move through our state, a precedent will be set and others will follow. "If you build it they will come". It may seem beneficial now but, 10 years down the when corporations want to turn our wild and scenic by-ways and prized Rocky Mountain landscape into a super-sized high and wide interstate through our front yards, remember that it could have been prevented by saying no to the KMT project and the precedent it will set.

11. See response to Common Comment K.

Sincerely,  
Jim Hepburn  
j.hepburn@hotmail.com  
406-223-3907

The Lochsa River Conservancy  
lochsariverconservancy@live.com

**Petition by The Lochsa River Conservancy**

We the undersigned believe that the Wild and Scenic Lochsa River Corridor and the Lewis and Clark National Scenic Byway (U.S. Highway 12) should not be used now or in the future for the transportation of extremely oversized commercial equipment and oppose Imperial Oil/ Exxon Mobil's proposed travel route in Idaho.

Not only will this project set a precedent for other interested parties but, this type of activity is contradictory to what the area represents and will be detrimental to small businesses and communities that depend on the recreational aspects of the area.

The narrow width, windy character and existing commercial traffic on U.S. Highway 12 already pose significant dangers to recreationalists and motorists alike. Multiple semi-truck wrecks in the past have spilled their fuel and contents into the delicate river ecosystem protected under the Endangered Species Act and the Clean Water Act. Altering this roadway to accommodate oversize loads can and will have adverse effects on the Lochsa River ecosystem.

Projects such as the aforementioned should use routes specifically designed for oversize commercial use.

12

12. Comments noted.

Name	Signature	City and State	Occupation/ Affiliation	Date
Clair Yank	<i>Clair Yank</i>	Missoula, MT	Law Student / Boarding	April 16, 2010
Brad Dickson	<i>B. Dickson</i>	Missoula, MT	Law Student	4/16/2010
Darlene Dunning	<i>Darlene Dunning</i>	Missoula, MT	Law Student	4/16/2010
James P. Cannon	<i>James P. Cannon</i>	Missoula, MT	Law Student	4/16/2010
Aron Winters	<i>Aron Winters</i>	Missoula, MT	Student	4/16/2010
Robyn M. Gray	<i>Robyn M. Gray</i>	Missoula, MT	Student	4/16/2010
Jessica LaRoch	<i>Jessica LaRoch</i>	Missoula, MT	Student	4/16/10
Kaitlyn Minak	<i>Kaitlyn Minak</i>	Missoula, MT	Student	4/16/2010
Kathy Jones	<i>Kathy Jones</i>	Missoula, MT	Student	4/16/2010
Ann Harris	<i>Ann Harris</i>	Missoula, MT	Student	4/16/2010
Carly Forder	<i>Carly Forder</i>	Missoula, MT	Student	4/16/2010
Kimberly Hillier	<i>Kimberly Hillier</i>	Missoula, MT	Student	4/16/2010
Katherine Riker	<i>Katherine Riker</i>	Missoula, Mont.	Student	4/16/2010
Jan Walsh	<i>Jan Walsh</i>	Missoula, MT	Student	4/16/2010
Tony Zenger	<i>Tony Zenger</i>	Missoula, MT	Student	4/16/10
Cassie Della	<i>Cassie Della</i>	Missoula, MT	Law Student	4/16/10
Jessica Nemara	<i>Jessica Nemara</i>	Missoula, MT	Law Student	16 April 10
Christina Johnson	<i>Christina Johnson</i>	Missoula, MT	Law Student	4-16-10
Bill Lewis	<i>Bill Lewis</i>	Missoula, MT	Law Student	4-16-10
Sean Skellern	<i>Sean Skellern</i>	Missoula, MT	Law Student	4-16-10
Rob Olson	<i>Rob Olson</i>	Missoula, MT	Law Student	4-16-10
Stephen Hart	<i>Stephen Hart</i>	Missoula, MT	River Guide	4-17-10
Timmy Boyle	<i>Timmy Boyle</i>	Missoula, MT	River Guide	4-17-10
Will Plummer	<i>Will Plummer</i>	Missoula, MT	Fishing Guide	4-17-10
Brad Smith	<i>Brad Smith</i>	Missoula, MT	River Guide	4-17-10
Judy Weaver	<i>Judy Weaver</i>	Missoula, MT	Teacher	4-27-10
John Downie	<i>John Downie</i>	Missoula, MT	Student	4-27-10
Nick Demitrovich	<i>Nick Demitrovich</i>	Missoula, MT	Student	4/27/10
Teresa Petek	<i>Teresa Petek</i>	Missoula, MT	Student	04/27/10
Stephanie Kucera	<i>Stephanie Kucera</i>	Missoula, MT	Writer / Student	4-27-10
Paul Gailard	<i>Paul Gailard</i>	Missoula, MT	Student	4-27-10
Ethan Walker	<i>Ethan Walker</i>	Kalispell, MT	Student	4-27-10
Joe Sedlak	<i>Joe Sedlak</i>	Missoula, MT	Law Student	4-27-10





May 14, 2010

Tom Martin  
 Montana Department of Transportation  
 Environmental Services  
 Helena, MT

To MT DOT:

The Lolo Watershed Group would like to comment on the Kearsarge Module Transportation Project that would bring over-sized trucks along US Highway 12 and Lolo Creek on its way from the Idaho border to Missoula, Montana.

**LOLO WATERSHED GROUP - WENDY STURGIS AND THE LWG BOARD OF DIRECTORS**

1 { **1) First, we feel the public comment period was too short.** The Environmental Assessment (EA) was completed in April, and a few weeks is not enough for organizations, agencies and the public to review, digest and understand the complex issues raised by this proposal. Many non-profit membership groups, as well as our local community council that is made up of elected representatives, meet *at most* monthly...and many meet less often. How can you expect one month to be sufficient for people to read an assessment, contact other organizations and their own members, schedule meetings, or put together information for websites and disseminate it to parties who might have concerns??

1. See response to Common Comment F1.

2 { **2) As a watershed group, we are specifically concerned about the environmental impacts this project would have on our local water resources and aquatic species. The Environmental Assessment does not recognize all the costs of these associated impacts.** Construction of new turnouts and on-going additional maintenance of roads have the potential to add a significant amount of sediment to Lolo Creek. Also, icy winter roads will necessitate additional sanding and/or salting for safe travel of these big rigs. These activities have the potential to harm aquatic species – both macroinvertebrates and the endangered bull-trout that depend on them.

2. See response to Common Comment O.

3 { We are also concerned about the long-term affects of soil disturbance and the associated impacts of noxious weeds that are inevitable from both road construction and the relocation of power lines. Reseeding alone is not enough – it will take years of weed management to mitigate the impacts, and your environmental assessment does not indicate who will bear these costs.

3. Minor disturbances would be created by utility relocations. A weed management plan has been developed for the 10-mile plow and turnouts. See response to Common Comment I.

4 { The Montana Department of Environmental Quality listed Lolo Creek as an impaired water body on its 303(d) list of impaired streams, and the principal source of impairment is sediment from logging and roads. The road activities associated with this project threaten to add to the sediment loading, further impairing the creek. The Lolo Watershed Group is working with DEQ's TMDL and Non-Point Source Management sections to develop a restoration plan to improve water quality and water quantity in Lolo Creek, and this project threatens to add to the very problems we are

4. See response to Common Comment O.

trying to solve.

5 { 3) A project of this size and scope has the potential for HUGE and varied environmental, economic and social impacts. It involves travel through several states and changes to transportation infrastructure, affecting individuals and businesses throughout each state. This project should have nothing less than a THOROUGH REVIEW of ALL of the impacts, both during construction and the one year of transportation, and also for the cumulative effects for several years after when the effects will assuredly still be felt. **We strongly urge you to push for a complete ENVIRONMENTAL IMPACT STATEMENT allowing federal review.**

Thank you for your consideration.

Wendy Sturgis, Coordinator  
 Lolo Watershed Group  
 and the LWG Board of Directors,  
 Bobbie Bartlette, President  
 Doug Harkin, Vice-President  
 Gayland Enockson, Treasurer  
 Tom Morarre  
 Neva Larson

5. See the responses to Common Comments B and A.

dear tom martin/mdot representatives,

1 { i do not want the tar sand equipment trucks to be allowed to use my montana roadways. they will cause destruction to life locally and in the large scope due to the climate effects of their final destination, the tar sand mines of alberta.  
 please do whatever it takes to prevent this misuse of the lands we call western montana, and that of the rest of the planet, which the shippers attempt to obfuscate in their EA.

thank you,  
 matthew loveless

914 1/2 stoddard street  
 missoula, mt 59802

**LOVELESS, MATTHEW**

1. Comment noted.



The problem: How do they fuel for these large trucks.

1 { They can't pull into a normal gas station. Does this mean that they will also have large Gas Trucks following behind to gas them?

2 { Will the turnouts that will be put in stay in place to be used for visitors and others who live here to take a break to enjoy the scenery and take pictures, or to park in along the river? That would be kind of nice.

Just a foot note here:

It use to be said, "The best things in life are free" I think bottled water started breaking down that saying.

Dear State of Montana,

1 { Good day. I write as one of your citizens, today. This state has always awed me and I admire it greatly, both in its landscape and government. I am troubled, however, by the proposal by Imperial Oil to transport massive pieces of tar sands mining equipment through Montana's river corridors and along sensitive grizzly bear habitat in the Rocky Mountain Front. It is against Montana values, and though it may result in short-term economic gain for the state, in the long run the proposal is an economic loser, because you can't put a price tag on Montana's scenic highways and Wild and Scenic rivers. The burden of building these massive turnouts to allow these big rigs to dominate our roads and get a toehold into our best hunting and fishing spots in both Lolo Creek and the Blackfoot is beyond what Montanans can bear. It could, in one fell swoop, butcher the evolving land ethic here in western Montana that has put this area on the global radar as The Last Best Place. This proposal is going to affect elk herds. This is not addressed in the EA. This proposal is going to affect grizzly bears. This not fully addressed in the EA. This proposal is going to affect bull trout. This is not addressed in the EA. This proposal will deposit sediment into the Blackfoot River and Lolo Creek, a violation of the Clean Water Act. This proposed project needs the scrutiny of a full-blown Environmental Impact Statement.

2 { This proposal needs to go through the processes granted to United States citizens under the National Environmental Protection Act. In addition, Montana grants all of its citizens the right to a clean and healthful environment. I urge you to take a deeper look at this project, as required by law.

With regards

Josh Mahan  
1626 S. 5th W. #4  
Missoula, MT 59801  
(406)-529-4238

**M G**

1. The trucks will be disconnected from the trailer and fueled at a regular filling station.
2. MDT will decide following completion of the hauling which turnouts to retain.

**MAHAN, JOSH**

1. See the responses to Common Comments I and O.
2. See the responses to Common Comments B, A, and R.

**Subject:** ExxonMobil Kearny Module Project - YES - 100% support!  
 Dear Mr. Tom Martin;

1 { I am 100% in favor and in support of Imperial Oil/ExxonMobil's Kearny Module Transport Module Project.  
 I have lived almost all my life in MT and believe this is good for Montana, good for the energy industry which we desperately need to support this to reduce our dependency on foreign oil.  
 Thanks for supporting this worthwhile project. Dave Malek  
 1217 Babcock Blvd.  
 Billings, MT 59101

**MALEK, DAVE**

1. Comment noted.

Tom Martin  
 MDT Environmental Services Bureau  
 PO Box 201001  
 Helena, MT 59620-1001  
 Dear Mr. Martin,

Thank you for this opportunity to comment on the Kearl Module Transport Project Environmental Assessment.

- 1 { The project involves two US borders, four U.S. states, and corporations from several different countries. It will create a permanent industrial transport corridor through some of America's most treasured scenic areas.
- 2 { There must be a full Environmental Impact Statement, not just an Environmental Assessment.
- 3 { The sole purpose of the project is to facilitate the development of the Alberta Tar Sands and allow Exxon to maximize its profits by outsourcing manufacturing jobs to Korea. The EA completely fails to take into account the economic and environmental costs to the United States, and indeed the world, of climate change, which development of the Alberta Tar Sands will significantly accelerate.
- 4 { It also fails to take into account the economic costs of outsourcing jobs from North America.
- 5 { Each giant transporter will weigh as much as 632,450 pounds! The EA fails to take into account the costs of the cumulative damage to roads and bridges which would result not just from the 200 shipments currently planned by Exxon, but from the additional hundreds or, more likely, thousands of shipments of massive industrial equipment to the Alberta Tar Sands which would occur for decades to come.
- 6 { Furthermore, the EA understates the costs of traffic delays which will be caused by the project.

**MANN, ELIZABETH**

1. See response to Common Comment K.
2. See response to Common Comment B.
3. See response to Common Comment P.
4. Comment noted.
5. See response to Common Comment K. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs.
6. MDT agrees with the analysis of the cost of delays in Section 3.6.2.6 of the EA.

7 { In summary, the EA fails to properly account for all the costs that will be associated with the project. Neither the development of the Alberta Tar Sands nor the outsourcing of jobs away from North America is in the best interests of this country, or the state of Montana. The project serves no public interest. MDT should reject this proposal.

Sincerely,

Elizabeth Mann  
12 Bedford Street  
NYC 10014

7. See response to comments 6 and 4 of this letter above.

As the Chairman of the Greenough Potomac Fire department I have concerns about the fire and medical safety and protection of property during the time the big rigs are traveling along Hwy 200.

A ten minute delay is not acceptable when we have a medical emergency (heart attack) , fire, car wreck, etc. .

What is the plan for emergency response ?

{ This will be Hwy 200 with your plan in place.

**A** \_\_\_\_\_ **B** \_\_\_\_\_ **C**

**A = location of fire station**

**B = The big load**

**C = Emergency we need to respond to**

{ How do we get around the big load if it is not in the pull out area?

I will meet with you if that would be helpful.

Darryl Mariucci  
Chairman  
Greenough / Potomac Fire Département  
Home address  
670 Swanson Lane  
Potomac, MT 59823  
406-244-5971

**MARIUCCI, DARRYL**

1. See response to Comment H3.

Hello MDOT decision makers.

Please deny the requested 32J permit to Imperial Oil/Exxon for their project to move "big rigs" through western Montana. The EA submitted for this project/permit is seriously inadequate.

{ For example, it fails to consider any potential negative economic impacts to Missoula-area rafting, fishing and other outdoor outfitting businesses. I'm sure you realize that tourism is a major industry in western Montana. Traffic delays and potential accidents are likely to adversely impact those businesses, yet impacts to tourism is not considered.

**MARLER, MARILYN**

1. See response to Common Comment M.

2 { Also the EA assumes zero accidents. That seems unlikely.  
 3 { Finally, given that the project for which the 32J permit is required necessitates permanent and significant infrastructure improvements to highways and bridges, it seems reasonable that the EA consider future use of the travel corridor.

Thank you for considering these comments, and please deny the permit.  
 Marilyn Marler, Missoula, 543-6721

These are real comments made by a real person.

1 { First of all, I believe that having 30 days for public comments is inadequate. It gives the impression that the department of transportation has already made their decision and is trying to railroad the idea past the people of Montana.

2 { I am against the Department of Transportation issuing a permit. Here are some of my concerns  
 • I don't feel that the risks and costs to the states economy have been thoroughly assessed.  
 • The stability of the long term income our state receives from tourism and recreation in this scenic corridor is more important than the short term gains we might receive from this project.

3 { • Modifying our scenic byways for these big rigs will create a corridor for future similar transports. These scenic corridors should not be used for industry. We have a Federal Interstate System already in place for large transports.

4 { • If there was a major catastrophe in the corridor (i.e. Forest Fire, Earthquake, Terrorist Attack, Landslide etc.) while the large rigs were coming through, State and Federal emergency services would not be able to respond adequately. The risk toward our environment and population is too great.

5 { • Let's put the resources and efforts of the MDT toward sustaining, maintaining, and improving our existing state road system, rather than accommodating large corporations who do not have a long term investment in our state.

6 { Exxon is hoping that Montana will take the thin carrot its offering. If we properly assess the risks and costs of this project and gave Exxon an accurate quote, I doubt that they would choose this route. By the way, while Exxon is a US company, it paid little or no Federal Taxes in 2009. This concerns me as my State tax dollars support the MDT.

7 { I agree with Jim Lynch's comment in today's Missoulian, that the basic question is whether or not of issue a permit, but this decision does have ethical implications. It's not just about the bottom line. By issuing the permit, the State of Montana would implicitly support the environmental devastation that's occurring in the oil sands.

Thank you for taking my comments.

- 2. See response to Common Comments H1, H2 and H3.
- 3. See response to Common Comment K.

**MARSOLEK, MATTHEW**

- 1. See response to Common Comment F1.
- 2. See response to Common Comment M.
- 3. See response to Common Comment K.
- 4. See responses to Common Comments H1, H2, and H3.
- 5. Comment noted.
- 6. See response to Common Comment L.
- 7. See response to Common Comment E1.

Sincerely,  
 Matthew Marsolek  
 PO Box 672  
 Arlee, MT 59821  
 406-726-4445

**MATHERS, CHRISTINE**

Hello,  
 As a Montanan who is proud of her state's incredible constitutional assurance of a clean and healthful environment, I encourage the MDT to reconsider the proposed Tar Sand's shipment route through the beautiful Lochsa River, Lolo Creek and my own community, Missoula. Not only do I strongly oppose the politics of an international corporation who seeks increased profit, regardless of the long-lasting impacts that profit creates, I cannot support a route such as this that will NOT benefit our current generation, and certainly will not benefit the future. While these shipments may bring a handful of short-term jobs to our region, they will bring innumerable negative consequences. So often decisions like these do not take into account future catastrophes (and the money those situations will necessitate from our state, not to mention the negative impacts on our environment and communities); please do not let this decision do the same. Imperial Oil cannot justify the Alberta Tar Sand's project unless they describe it in terms of saved revenue; it is environmentally and ecologically abhorrent. Please do not force the communities of Western Montana to support this project by forcing us to accept the significant negative impacts that we will feel intimately.

1. Comment noted.

Thank you for recognizing the significance of this issue and continuing to allow public comment throughout the process of a FULL environmental assessment.

2. Comment noted

Sincerely,  
 Christine Mathers  
 1525 Phillips St.  
 Missoula, MT 59802

**MATHSEN, RONALD M.**

MT Department of Transportation:

I only fully and strongly opposed to allowing the Hugh oil extraction equipment to use MT highways to move Lolo Pass to Sweetgrass/Coutts. First, the equipment is much too large to move as proposed on highways without endangering other travelers on those highways. Secondly, these massive trucks and heavy equipment has a strong potential to inflict serious structural damage to highways, especially shoulders and edges, bridges, any overpasses or underpasses as well as any soft spots that could develop.

1. See response to Common Comment G.

2. See response to Common Comment L.

<p>3 { Why would be as a state want to permit this use of our public highways? Surely not to encourage and support the tar sand oil extraction industry which is the dirtiest of all methods of extraction of oil. It produces huge amounts of CO2 and particulate matter that has a huge impact on climate change/global warming - witness the fire and insect threats to our forests, the melting of our glaciers, the drying up of our reservoirs, rivers and streams, and the uncertainty of our developing weather patterns.</p> <p>4 { We have nothing to gain except to show the rest of the country how gullible we are. We have lots to loose including our credibility.</p> <p>4 { I request that in this serious matter you must do a full environmental impact study before even considering such a foolish move.</p> <p>Ronald M. Mathsen, Concerned husband, father and grandfather, and citizen Just so NO! to this insult to our state's integrity</p>	<p>3. See responses to Common Comments E1 and P.</p> <p>4. See response to Common Comment B.</p>
<p>Project Commenting On: Kearsal Module Transportation Project Kristina Matthes 1150 34th St. Apt. 6D Missoula MT59801 Email Address: matthes_15@hotmail.com Phone Number: (406) 728 9352 Comment or Question: I am opposed to big rigs going over Lolo Pass, down Lolo Creek, and along the Blackfoot River.</p> <p>1 { The turn-outs will deminish the scenic beauty of these roads, which my husband and I enjoy biking along to get to fishing and recreation (scenic places to ride our mountain bikes). Any trees cut to accomodate the thirty-foot high trucks will deminish the appeal of these roads. If a single life is lost due to an accident or held up traffic, the transportation project will</p> <p>2 { NOT have been worth the cost. I am extremely opposed to a permanent corridor through western Montana on our last remaining scenic roads. The beauty of our state is worth much more than 68 million dollars. It is frustrating that while Montana's greatest asset would be injured with the road scars, it would also be injured by the increased global warming caused by removing and using the oil they plan to extract in the Kearsal Oil Sands fields in Alberta.</p> <p>3 { If, to Montana's misfortune, this Kearsal Module Transportation project goes forward as planned, we should insist that Imperial Oil/Exxon Mobil pay to remove any turnouts after the 200 modules move through Montana. Also, citizens should be compensated for the disruption, by a well-publicized donation of several million dollars to Five Valleys Land Trust, or another local environmental program.</p>	<p><b>MATTHES, KRISTINA</b></p> <p>1. See response to Common Comment J.</p> <p>2. See responses to Common Comment K and P.</p> <p>3. See also responses to Common Comments L and G.</p>

<p>4 { The public needs more time to comment on this project, if they are to feel part of a democratic process. There is anger in Missoula County; people feel that this is a done deal and they weren't consulted. If this project goes ahead without full compensation, people who feel strongly about the need to be good stewards of the land will consider what actions they can take to disrupt this project. Thank you for your consideration.</p> <p>5 { Kristina Matthes</p>	<p>4. See response to General Comment F1.</p> <p>5. Comment noted.</p>
<p>1 { I attended the public hearing about the Kearl Module Transport Project on Thursday, 4/29/10, at Meadow Hill School in Missoula. After hearing the questions from the audience and the responses from both the Montana Department of Transportation and Imperial Oil, I strongly believe the public comment period needs to be extended for another 90 days.</p> <p>2 { One reason is that the public needs to know in more detail what preparations Imperial Oil has made for safety and protecting the environment in the event of mechanical failure or accidents involving their over-sized vehicles. It is not enough to state, as one representative of Imperial Oil did, that they are positive there will be no equipment failures, breakdowns or accidents. The Gulf of Mexico is currently dealing with the tragic results of that mentality from another oil company.</p> <p>3 { There also does not seem to have been sufficient ongoing communication with the local Emergency Services agencies. I have worked as a 9-1-1 Dispatcher in the past, and I know first-hand how imperative it is to have accurate and immediate communication among the various agencies in event of any emergency.</p> <p>4 { Furthermore, I believe this project deserves the more extensive review that an Environmental Impact Statement (EIS) would provide. One of the reasons given for not requiring an EIS is that no Federal funds are involved in the project, and this project is only addressing the route through Montana. I believe this is disingenuous and avoiding some bigger issues. One issue is that the entire project impacts four Pacific Northwest states (Washington, Oregon, Idaho and Montana) since the equipment has to travel up the Columbia and Snake Rivers before traveling across land in Idaho and Montana. In addition, the Port of</p> <p>5 {</p>	<p><b>MATTHIAE, MARY</b></p> <p>1. See response to Common Comment F1.</p> <p>2. See responses to Common Comments H1, H2 and H3.</p> <p>3. The EA addresses communications in the case of emergencies on page 13.</p> <p>4. See response to Common Comment B.</p> <p>5. See response to Common Comment E2.</p>

<p>5 { Lewiston, ID used Federal stimulus funds to improve their facilities, in part to accommodate the equipment needed for this project. You cannot consider the route across Montana or any other of these states separately, since without even one of them, the project could not succeed.</p> <p>6 { I live in Missoula, and I have been a resident of Montana for over 40 years. I value the time I can spend outdoors in the mountains and on the lakes and rivers of my state, and I want to see them protected for many generations to come.</p> <p>7 { In summary, please extend the comment period for another 90 days, in order to give full consideration of the impact this will have on both the people and environment of Montana. Thank you.</p> <p>Mary A. Matthiae 804 W. Pine Street Missoula MT 59802 406-721-1194 Mary Matthiae Missoula County Central Services 406-258-3465</p>	<p>See response on previous page.</p> <p>6. Comment noted.</p> <p>7. See response to Common Comment F1.</p>
<p>1 { To whom it may concern: I do not want the Alberta Tar Sands equipment shipped through Montana. Keep the current route from Texas. Madeline Mazurski Missoula MT</p>	<p><b>MAZURSKI, MADELINE</b></p> <p>1. Comment noted.</p>
<p>1 { Please do not allow our state roads to be used for this monster! It will disrupt our best industry! Tourists! It is not in our interests or in the planets interest to do this. Please vote to stop it from coming to us over the next 18 months! Thank you , Steve</p>	<p><b>MCARTHUR, STEVE</b></p> <p>1. Comment noted.</p>
<p>Schweitszer! 1 { What will you look like when one of these things rolls over? Or when the pipeline bursts? Let's be forward thinking as you were on prescriptions and start wind-farms in Great Falls and Eastern MT More labor intensive with no disasters!! Those trucks are dangerous and bad for us and the earth. Accidents happen, Sarah McClain</p>	<p><b>MCCLAIN, SARAH</b></p> <p>1. See response to Common Comment H2.</p>



1 { I think the oilfield trucks should be allowed to use HWY 12. Just put the turnouts where people could access the river. William Mccool, 11720 lewis and clark dr., lolo, mt.

**MCCOOL, WILLIAM**

1. Comment noted.

To Whom It May Concern:

**MCGAHAN, JERRY**

1 { It is time for good sense. We must put our efforts into alternative sources of energy. It makes such good sense to do this before exploiting tar sands at immense cost to our natural world, when we must do it anyway after all the oil is in our air cooking our planet.

1. Comment noted.

Sincerely,  
 Jerry McGahan  
 Box 71  
 Arlee, Montana 59821  
 406-726-3480  
[arleeart@blackfoot.net](mailto:arleeart@blackfoot.net)

Name: Chelsea Mclver  
 Address Line 1: 19550 Six Mile Rd.  
 City: Huson  
 State/Province: MT  
 Postal Code: 59846  
 Email Address: chelsea.pennick@gmail.com  
 Phone Number: 406-626-2414  
 Comment or Question:

**MCIVER, CHELSEA**

1 { Hi, my name is Chelsea Mclver and I would first like to thank MDT for providing this opportunity for public comment. I am writing to express my significant concern regarding the proposed KMTP project that would widen roads over Lolo Pass and up into the Blackfoot Region, impacting riparian areas, wildlife movement and transportation of residents and tourists. I am concerned about the level of analysis that has been completed and feel that more extensive analysis in the form of an EIS should be required. These areas (Lolo Pass and Blackfoot) are important and wild lands that I feel should be protected from this level of impact. It also concerns me that the infrastructure development and investment is being made for only one project and the analysis may only consider impacts from this isolated project, but wider roads will no doubt bring more traffic, possibly of similar type and impact, which may not be included in the full analysis at this stage. Thank you for taking these comments into consideration.

- 1. See responses to Common Comments G, I and O.
- 2. See response to Common Comment B.
- 3. See response to Common Comment K.

<p>Dear MDT,</p> <p>1 { Please deny the request for the 32J permit since the EA fails to consider potential accidents as well as negative impacts to tourism.</p> <p>Thank you,          Holly McKinney          1700 S 11th St W          Missoula, MT 59801</p>	<p><b>MCKINNEY, HOLLY</b></p> <p>1. See responses to Common Comments H1, H2, H3 and M.</p>
<p>1 { Since the Canadians spent their oil development money having the Koreans build their equipment they should be required to include in their project budget the costs of replacing the Montana highways which will be destroyed by their heavy trucks and trailers. Building a few turnouts may minimize the inconvenience to the traveling public during transport, but will not mitigate the permanent damage the overweight traffic will cause to our highways. The cost of reconstruction should not be paid by the taxpayers of Montana and the first Canadian truck should not be allowed to enter our state until there has been deposited with the state sufficient cash in U.S. dollars (no "promises" or bonds) to completely rebuild all highways of the state as well as all city streets which will be destroyed. C.B.McNeil, Box 486 , Polson, Mt.59860.</p>	<p><b>MCNEIL, C B</b></p> <p>1. See the response to Common Comment L.</p>
<p>To whom it concerns:</p> <p>1 { This proposal is close to insane as far as western Montana and northern Idaho is concerned. Primarily (but not solely) it is a problem of scale. The sheer size of the pieces of equipment to be transported does not comport with the the relatively small scale of roads, drainages, and environmental features of this area. East of divide, whether in Montana, Alberta (with which I am very familiar), or further south, the scale of the landscape is much larger and more able to accommodate this kind of transportation problem.</p> <p>2 { Furthermore, if there are to be 200 loads transported over about 12 months, this amounts to an average of over one load every two days. The frequency of such interruption to the normal flow of western Montana traffic is bound to have negative impacts, including increasing 'road rage' and general motorist anger and frustration that can only contribute to the already-high dissatisfaction with 'big industry,' 'government,' and 'them, over which we have seemingly no control.' This will help to further erode any remaining sense of 'public good,' 'public goodwill,' and civic responsibility. In other words, its side effect will be an increase in lawlessness overall.</p> <p>3 { It is none of our business what the use of this equipment is, whether or not oil sand exploitation is environmentally benign, nor the fact that the equipment is destined for Canada. These factors are not relevant. The project remains, however, an extremely</p>	<p><b>MCQUILLAN, ALAN G.</b></p> <p>1. See response to Common Comment D1.</p> <p>2. See response to Common Comment G.</p> <p>3. Comment noted.</p>

<p>bad idea for the reasons I have outlined above.</p> <p>4 { The department has already set a bad precedent in continuing to allow the transportation of hazardous material down the east side of Flathead Lake. This laissez-faire attitude should not become a habit.</p> <p>Sincerely, Alan McQuillan (Retired professor of forestry)</p>	<p>4. Comment noted.</p>
<p>Montana Department of Transportation: RE: KEARLE MODULE TRANSPORTATION PROJECT</p> <p>1 { Based on a lack of information at the Missoula meeting on April 29, 2010, I suggest an additional 90-day comment period be allowed to provide needed assessment of this project. With the present information presented to the public, I oppose the project. The public needs to be adequately informed regarding the impact of transportation of the supersized modules on wildlife, local business, and the possibility of accidents.</p> <p>2 { Apparently there isn't an emergency plan in existence at this time should an accident occur, and the route to be taken was never designed to accommodate vehicles of this size. Are we prepared for possible traffic delays, as well as accidents, in years to come should this route become established through use? I think not. A route already exists via the Gulf of Mexico. This projected route will undoubtedly save Imperial/Exxon Mobile considerable money, but will that savings eventually be shifted to the taxpayers of Montana due to accidents, litigation, highway damage, etc? A careful and thoughtful examination is needed regarding this project.</p> <p>Sincerely, T.A. McSloy 347 Fairview Ave. , Missoula, MT 59801</p>	<p><b>MCSLOY, T A</b></p> <p>1. See response to Common Comment F1.</p> <p>2. See the responses to Common Comments H1, H2, and H3.</p>
<p>I am Gerald McVay, 627 Edith St. Missoula. I am a member of or contributor to local and national environmental organizations but I represent none.</p> <p>My comment, and a question:</p> <p>1 { *The proposed route follows Lolo Creek and the Big Blackfoot River. Many turnouts are planned. I question whether these can be completed without disturbances to one or both streambeds.</p> <p>2 { * This is a proposal by a Canadian company to transport Korean equipment for work in Canada. It is huge, disruptive and risky. Why isn't it being shipped instead to a port in British Columbia?</p>	<p><b>MCVAY, GERALD</b></p> <p>1. See response to Common Comment O.</p> <p>2. See response to Common Comment D1.</p>

To the Montant Dept of Transportation,  
 I am writing to urge you to consider all the environmental impacts of the proposed Tar Sands truck transportation through Montana. The impact of this transport is one thing to consider but also the total environmental impact in general of this kind of mining. Montana can do it's part to limit the kind of damage that a development such as this would most certainly do.  
 Thank you for your increased scrutiny of this matter.  
 Marta Meengs 107 North Ave W. Missoula, Mt 59801

**MEENGs, MARTA**

1. See response to Common Comment E1.

Dear MDT Folks,  
 For SAFTEY SAKE keep the 24 foot wide trailers that Exxon Mobile wants to send through our state off our winding climbing not so very wide Highways. My husband and I had a heart stopping narrow escape from collision with a Semi which took more than it's lane on Lolo pass. What accidents await if 24 foot wide loads are traveling Lolo pass, the Blackfoot, and Rogers pass? Granted the behemiths that Exxon proposes would have wide load warning cars but is that enough and if one car is in a pull off where will the other cars go to let the 24 footer pass. Where will Semis, Pickups, SUVs and RVs go to let it pass? How long will it take tourists, locals, and commerce to get through these corridors if they must be ever yielding to, following, or just plane worrying about these loads.  
 My husband and I have signed and sent a postcard (provided by the Clark Fork Collition) addressing the enviornmental concerns of this proposal but I felt that I must also write about the saftey issues and let you know that I support a big NO to a permanent industrial corridoor in Western Montana for the sake of Montanans, visitors, and normal interstate commerce.  
 Sincerely  
 Peggy D Meinholtz  
 2120 S 5th W, Missoula MT 59801

**MEINHOLTZ, PEGGY**

1. See response to Common Comment G.The Montana Transportation Plan provided online along with the EA described the method of traffic control and clearing the module from the highway. The module will be stopped and pulled at least partially off the roadway (in some cases all the way off) to allow other vehicles to pass. It is also unlikely that a motorist would encounter more than one or two modules on any trip.
2. See responses to Common Comments H1, H2 H3, and C2.

To Whom It May Concern:  
 I have serious environmental concerns about the tar sands development proposed in Alberta and Montana's participation by allowing transportation through the state. I urge you to prepare a full environmental impact statement and not be satisfied with only an environmental assessment, before you issue a permit to transport this equipment across the state.  
 Yours truly,  
 Brian L. Melchar

**MELCHAR, BRIAN**

1. See responses to Common Comments E1 and B.

<p>this one came in via phone.                  Kathryn and Douglas Miller                  453-5048</p> <p>1 { Both feel that other options should be explored for the use of Montana Roads                  Thanks!</p>	<p><b>MILLER, KATHRYN AND DOUGLAS</b></p> <p>1. Comment noted.</p>
<p>To Whom it May Concern:</p> <p>1 { I am writing to encourage you to deny the right to allow the access of our highways to expedite the awful tar sands development. Would we allow rapists to export children across our highways? What about poachers decimating wildlife? This development is just as dangerous cumulatively for communities, habitats and globally, in the contribution of global warming, than any other behavior we deem "bad".</p> <p>2 { Not only will it terribly inconvenience our local population, it will clear old growth forests, harm water quality, produce harmful particulates, and increase climate changing greenhouse gasses. Why should we help them accomplish this? Please deny their right to parade through our streets. We are only embarrassing and harming ourselves.</p> <p>Respectfully submitted,                  Ashea Mills                  PO Box 1085                  Gardiner, MT                  59030</p>	<p><b>MILLS, ASHEA</b></p> <p>1. Comment noted.</p> <p>2. See response to Common Comment P.</p>

May 13, 2010

Tom Martin  
Montana Department of Transportation  
PO Box 201001  
Helena MT 59620-1001

Subject:           Kearl Module Transportation Project

Dear Mr. Martin,

Enclosed is a copy of a resolution adopted by the Missoula City Council on May 17, 2010, a copy of the transcript from the meeting, and the written citizen testimony the City Council received on the Kearl Module Transportation Project. The resolution passed on a 9 ayes, 2 nays, 1 absent vote. Voting in favor of the resolution were councilpersons Childers, Houseman, Jaffe, Marler, Mitchell, Walzer, Wiener, Wilkins and Strohmaier. Voting against the measure were councilpersons Hellegaard and Haines. Councilperson Rye was absent.

Sincerely,

Marty Rehbein  
City Clerk

Enclosures

## MISSOULA CITY COUNCIL

**RESOLUTION NUMBER 7528**

**A RESOLUTION OF THE MISSOULA CITY COUNCIL COMMENTING ON THE MONTANA DEPARTMENT OF TRANSPORTATION'S KEARL MODULE TRANSPORTATION ENVIRONMENTAL ASSESSMENT AND REQUESTING THE HEIGHTENED LEVEL OF SCRUTINY AFFORDED BY AN ENVIRONMENTAL IMPACT STATEMENT CONDUCTED UNDER THE MONTANA ENVIRONMENTAL POLICY ACT AND THE NATIONAL ENVIRONMENTAL POLICY ACT.**

**WHEREAS**, Imperial Oil/ExxonMobil (Exxon) applied for permits from the Montana Department of Transportation (MDT) to transport approximately 200 oversize loads through Montana, including through Missoula's city limits; and

**WHEREAS**, moving loads as large as 24 feet wide, 210 feet long and 30 feet high and weighing up to 580,000 pounds will require extensive construction over almost 300 miles of Montana highways, including but not limited to permanently raising or burying utility lines at 572 locations, modifying or installing 33 traffic structures, permanently modifying 22 existing highway turnouts and building 53 new highway turnouts; and

**WHEREAS**, Exxon proposes to move up to two loads per day through Montana, including the movement of three to four loads per week through Missoula for 12 months; and

- 1 { **WHEREAS**, the construction required for these large loads will create a permanent high/wide corridor through Montana and Missoula that will attract the interest of additional oversize trucking projects destined for Alberta, as set forth in the draft Environmental Assessment's (EA) Past, Present and Reasonably Foreseeable Impacts section and in MDT Director Jim Lynch's 2009 "Proposed High and Wide Corridors Briefing" to a Montana Legislature committee; and
- 2 { **WHEREAS**, the draft EA's Purpose of the Project does not address the creation of a permanent corridor to serve future oversize trucking; and
- 3 { **WHEREAS**, the draft EA does not include an adequate consideration of alternative routes, including a route from the Port of Houston currently being used to transport oversize loads destined for Alberta tar sands projects; and
- 4 { **WHEREAS**, scoping of the EA was conducted without formal public comment or consideration of the long-term impacts of the project through a programmatic review, therefore limiting MDT's impacts analysis to Exxon's specific proposal rather than adequately addressing the direct, secondary and cumulative impacts of creating a permanent high/wide corridor through Montana and Missoula; and
- 5 { **WHEREAS**, the Montana Environmental Policy Act (MEPA) and its implementing regulations require MDT to examine the direct impacts, secondary and cumulative impacts of a proposal; and
- 6 { **WHEREAS**, the EA fails to weigh the cumulative impacts of oversize loads in a permanent high/wide corridor on infrastructure designed for standard-weight vehicles; and
- 7 { **WHEREAS**, the EA fails to adequately weigh the incremental losses to Montanans and Missoulians from additional traffic delay and increased risks of accidents; and
- 8 { **WHEREAS**, the EA does not address whether the proposed project intends to direct project employment and contracting toward Montana citizens and businesses; and
- 8 { **WHEREAS**, the EA fails to consider the negative economic impacts of developing a permanent high/wide corridor on tourism and outfitting, industries that generate \$3.1 billion statewide and over \$300 million annually in the City of Missoula and, therefore, the EA overstates the economic benefits to Montanans of the proposed project; and

- 1. See response to Common Comment K.
- 2. See response to Common Comment D1.
- 3. See response to Common Comment C2.
- 4. See response to Common Comment S.
- 5. See response to Common Comment S.
- 6. See responses to Common Comments H1, H2, H3, G, and M.
- 7. See response to Common Comment Q.
- 8. See response to Common Comment M.

- 9 { **WHEREAS**, the EA fails to analyze whether potential detrimental effects on water quality in Lolo Creek and the Blackfoot River will result from the amended MDT sanding and snow removal procedures necessary during the project; and
- 10 { **WHEREAS**, the EA fails to analyze the economic and environmental impacts to Montana of the Alberta tar sands strip mining promoted by the state's proposed action; and
- 11 { **WHEREAS**, while the proposed high/wide corridor crosses three state and two international boundaries the scope of the EA is limited to only one segment of the corridor, preventing consideration of the impact of the project as a whole; and
- 12 { **WHEREAS**, due to the limited scope of the EA, MDT cannot properly determine the impacts of the proposed action on the human environment, including but not limited to water resources, fish and wildlife the transportation system, and the local economies and communities along the proposed route; and  
**WHEREAS**, imposing effective mitigation requirements on the proposed project's permits is not possible without first adequately determining the impacts of the proposed action; and
- 13 { **WHEREAS**, the transportation project involves and impacts other federal, state and local agencies as evidenced by the list of consultations provided in the EA and the breadth of impacts identified by the public; and  
**WHEREAS**, MDT is required to cooperate and coordinate with other state and federal agencies to prepare appropriate environmental analysis and to comply with the National Environmental Policy Act (NEPA) as well as MEPA where there is federal action; and
- 14 { **WHEREAS**, based on an inadequate scope, unevaluated or under-evaluated impacts and failure to coordinate with affected agencies, the EA erroneously concludes that no significant adverse impacts will result from this project;

**NOW, THEREFORE BE IT RESOLVED**, the Missoula City Council hereby declares that complying with the spirit and letter of MEPA and NEPA will require environmental review taking the form of a programmatic joint EIS under MEPA and NEPA and urges MDT to begin such a process in cooperation with affected or involved federal agencies, fully involving the public and exhaustively evaluating the impacts of creating a permanent high/wide commercial transportation corridor from the Port of Vancouver to the Alberta tar sands.

**PASSED AND ADOPTED** this 10th day of May, 2010.

**ATTEST:**

**APPROVED:**

/s/ Martha L. Rehbein  
 Martha L. Rehbein, CMC  
 City Clerk

/s/ John Engen  
 John Engen  
 Mayor

- 9. See response to Common Comment O.
- 10. See response to Common Comment E1.
- 11. See responses to Common Comment E1, E2, and A.
- 12. See responses to Common Comments I and L. MDT concludes the EA and decision document adequately assess potential impacts and properly concludes no significant impacts.
- 13. See responses to Common Comments S and B.
- 14. MDT concludes the EA and decision document adequately assess potential impacts and properly concludes no significant impacts.



**Excerpt from the transcript of the 5/10/2010 Missoula City Council Meeting concerning the Kearl Module Transportation Project**

**Public Works Committee**

05/05/2010

- Resolution—Adopt a resolution of the Missoula City Council commenting on the Montana Department of Transportation's Kearl Module Transportation Environmental Assessment and requesting the heightened level of scrutiny afforded by an environmental impact statement conducted under the Montana Environmental Policy Act and the National Environmental Policy Act.

Alderman Wiener said, I move that we adopt a resolution commenting on the Montana Department of Transportation's Kearl Module Transportation Environmental Assessment requesting the heightened level of scrutiny afforded by an environmental impact statement conducted under the Montana Environmental Policy Act and the National Environmental Policy Act, and I'd speak to the motion.

Acting Mayor Childers said, continuation to speak to the motion.

Alderman Wiener said, just very briefly, the resolution here is an effort to encourage the Montana Department of Transportation to adequately review what is intended to be a permanent high and wide corridor through the state of Montana. It highlights the ways in which the scope of the impact examined are underestimated, specifically because of the improper segmentation of the process which is to the benefit of the applicant and to the detriment of Montanans, and also because of the poor quality of the alternatives examined, namely the exclusion of the existing route from the Port of Houston to Alberta. And the resolution offers an adequate... a path to that adequate review which Montanans deserve.

Acting Mayor Childers said, thank you.

Alderman Wiener said, I'd just note that MDT Director Jim Lynch is kind enough to come down and answer questions. We had members of Public Works Committee request that he do so.

Acting Mayor Childers said, we thank you for coming, Director. Questions and comments from the Council? Anyone from the Council have questions or comments? Ms. Mitchell? By the way, I did have you on the last list, you were next.

Alderwoman Mitchell said, I had my hand up several times, but that's okay, that's water under the bridge, so to speak. Now since Mr. Lynch is here, I would like to ask him a question or two.

Acting Mayor Childers said, hi, Director, please introduce yourself. Make sure the microphone is on.

Jim Lynch said, I think it's on.

Acting Mayor Childers said, it's on.

Jim Lynch said, my name is Jim Lynch and I'm the Director of the Montana Department of Transportation.

Alderwoman Mitchell said, thank you for making the time to come over here for our meeting tonight. The questions I have pertain to the Environmental Assessment that was done and whether it included any consideration of other alternative routes? Whether it concerned the creation of a permanent corridor? To me it sounds like we're going to try to land a 747 on the freeway.

Acting Mayor Childers said, Ms. Mitchell, would you like to ask one question at a time?

Alderwoman Mitchell said, yeah. The first one will be is, have we considered other alternative routes ar examined those very well?

Jim Lynch said, members of Missoula Council, for one, the action that is under review, under the Environmental Assessment, is the issuance of a 32J. That's a permit that is required by law in the state of Montana for anyone that wishes to haul an over-dimensioned load, which is what these would be, an oversized load. A 32J permit under Montana laws are issued to those that requested the issuance of th permit under the Montanan Environmental Policy Act, is an action that needs to follow the act. So what the Environmental Review established was the movement into an Environmental Assessment to discus the act or look at the impacts to the act and that's the issuance of a permit and only a permit. And the reason that it was, the corridor is actually selected by the entity in which the direction in which they wan to move. Whether they've looked at other corridors or not, I believe they address it in the EA but the action that the Department of Transportation is being asked to do is an issuance of a permit.

Alderwoman Mitchell said, have you had a chance to thoroughly read the EA that was submitted?

Jim Lynch said, members of the Council, yes, I have looked through the EA and we're still accepting comment on that EA until May 14<sup>th</sup>.

Alderwoman Mitchell said, and that was another question I have, do you think that May 14<sup>th</sup> is adequate to, for the public, to submit comments and questions on this? [inaudible]

Jim Lynch said, Ms. Mitchell, under the Montana Environmental Policy Act, that's the time period allowe and how it works is comments come in and there's no decision made until the comment period is closer the comments then are analyzed and answered. At that point, a determination is made. You can't predetermine that at this point under the Montana Environmental Policy Act.

Alderwoman Mitchell said, I guess I don't know if I should ask this or not but do you have any personal feelings about how practical this might be or not?

Jim Lynch said, yeah, I can't answer that, personally or as the Director of the Department of Transportation. I'm representing the integrity of an environmental document in process called Environmental Policy Act and just as I couldn't ask you that question.

Alderwoman Mitchell said, okay, I understand. Thank you.

Acting Mayor Childers said, might as well stay there, I'm sure we'll find more people to ask you questior Anyone else down on this end, oh, did you have one more? Okay, Renee.

Alderwoman Mitchell said, are there any provisions in place in case there is some kind of a snafu or something happens that isn't anticipated? Right now we're trying to figure out how to stop oil from the Gulf and we could have unforeseen things or we could even have a protest. This is Missoula and we've seen it before and I could envision 100 people up there lying down on the highway to stop these rigs, nx that I would say that people should do that but I think we need to be ready for anything that... this is a highly, highly hot issue, very controversial and I just wondered what provisions are in place for some kir of an accident, a road giving away, axels breaking, a load dumping off into that canyon. I drive that canyon quite often and I just have nightmares thinking about this going on.

Jim Lynch said, Council person, I don't know what's appropriate protocol here, Mitchell and members of the Council, that was a question that was asked and a comment was made so under the environmental document the Imperial Oil will have to answer that question. As far as the other question, what are you going to do with civil unrest; I think you have your law enforcement officers that probably can answer th question. That's not my protocol or forte.

Alderwoman Mitchell said, well, the money that the state will receive to allow these trucks to pass through here, how much of that money is going to be spent shoring up the road and doing the provisions that need to be taken to allow this to even happen?

Jim Lynch said, the Environmental Assessment covers those, it covers all of the areas in which they're going to either have to build new pull-outs or modify new pull-outs and the costs associated with it are in the document. Those are all paid for by the permittee, the person that's actually acquiring the permit. They have to pay that. The taxpayers aren't paying a dime for that.

Alderwoman Mitchell said, and if there's any damage, is that in the assessment too and who would be responsible for that?

Jim Lynch said, yeah, that's a good question. What they'll have to do, prior to the issuance of a permit, they'll have to provide a bond to cover any repair and damage. We'll have to enter into an agreement with them that they will repair any damage that they cause. Keep in mind that we're going through the process now and the size configuration, the number of axels to put underneath the load, not to have any damage, but just in case there is, there are provisions that will require the permittee to pay for those damages and there will be a bond to protect that. Secondly, probably more importantly is the Department of Transportation, if the hauler, let's just assume because I can't...we're not done yet with the comment period where we're way ahead of ourselves, but let's just assume as we walk...if we walk further and someone has issued a permit, that permit can be revoked at any time if the conditions of the permit aren't being upheld. It's not a permit that's given forever.

Acting Mayor Childers said, alright. Thanks. We'll go to the other side. Roy?

Alderman Houseman said, last week an individual commented that you had said that this is for about 200 loads in total but I guess a year before you had mentioned that this would be a permanent corridor. Could you clarify a response to that or...

Jim Lynch said, yeah, that...someone made that comment. What had happened, that was a comment made in front of the Revenue Transportation Committee. This was long before we even got to what we have here today. There was all sorts of requests of establishing a corridor in Montana. That's not what this action is. This action is from Imperial Oil, Exxon to receive 200 32J permits, permits to haul dimensional loads but not to establish a permanent corridor.

Alderman Houseman said, okay, a follow-up. When MDT decided to issue these permits, why did they feel that it was not necessary to do any EIS or any contact those federal regulatory agencies?

Jim Lynch said, members of the Council, Mr. Houseman, actually MDT has not issued any permits. Okay? We've been requested by the company to receive 32J permits and under that action, under the Montana Environmental Policy Act, that requires an environmental review. The environmental review then drives the extent of the document. It isn't something that I can arbitrarily pick or anybody can arbitrarily pick. You have to work through the process that we have in the state of Montana. It's a state action and that's why it's under the Montana Environmental Policy Act.

Acting Mayor Childers said, Lyn and Bob and Jason? Lyn?

Alderwoman Hellegaard said, thank you for coming, Director Lynch. A question I have for you, is there any let's say triggering mechanism that would require either a NEPA or an EIS other than the involvement of federal dollars in this project?

Jim Lynch said, this is a state action and so it doesn't qualify, it doesn't fall under NEPA. It falls under the Montana Environmental Policy Act. Now we still are in the comment period so we don't know what the comments are going to be or what may come out of that but as the process we're in right now, we're under the Montana Environmental Policy Act. I can't predetermine or assume or guess or look into a

crystal ball what the comments may be by the time the comment period may comes. So, there's no way I can give you that answer.

Alderwoman Hellegaard said, so, you're saying that there might be a comment in there or a group of comments that would trigger an EIS on this?

Jim Lynch said, no, I'm not saying that. I'm saying we have to wait until the comment period is over. Right now we're under... I know the question you want to ask, is there anything that can push this to a NEPA? Under Montana law, what we've see and what's been requested of us in the action that we're taking, we don't see anything.

Alderman Jaffe said, okay, a similar question I want you to elaborate a little bit more on that, that's a point of confusion for me as far as what, how it's decided when one activity would be a, you know, in the EA instead of an EIS, where the line gets drawn, and I understand inclusion of federal dollars in the project is one of those things but what are the other things that do that? Why are the comments even relevant at all in the answer you gave to the last question? You know, is there some...how does that decision get made, by who?

Jim Lynch said, under the request, if you look at, if Montana did not have a Montana Environmental Policy Act, there wouldn't be an environmental document. That's what's going on in Idaho right now. But Montana has an Environmental Policy Act which governs actions taken by states and they identify those actions, and one of those actions is the issuance of a permit, so that's why we're in the MEPA process. You, as a City Council or a city action amongst yourselves, I'm not an expert in this but I don't believe you have to abide by MEPA but the state does. So this is a state action.

Alderman Jaffe said, I understand this is a state action. My question is, what makes something a federal action?

Jim Lynch said, for example if we were to rebuild a highway that involves federal dollars, that would require a federal action.

Alderman Jaffe said, so that's the only thing that ever becomes a federal action is...

Jim Lynch said, I don't know if that's the only thing but in our business and in our world, under the Department of Transportation, the building of a highway with federal dollars would be a NEPA process.

Alderman Jaffe said, okay, and my other question is back again to one that was asked earlier about the difference between this being a permanent corridor and now being just the 200 loads, what actually changed in the proposal? I mean is it simply they filled out a different document, you know, a form for their proposal? I mean what's different about what they were proposing before and what they're proposing now?

Jim Lynch said, well, let me make it real clear. They never proposed it before. What they...the only action that they've asked the Department of...they may have discussed it, they may have talked about the benefits of a corridor, but what the action the Department of Transportation is taking is the request for a 32J permit. That's the action we're...that's what we're acting on. We're not acting on a permanent corridor.

Alderman Jaffe said, okay, and there's no provisions for the Department to look beyond what a permit request is? I mean, as far as...it sounds like you're extremely...your hands are just completely tied when someone tells you what it is you're allowed to look at, that's what you look at and you don't think outside of that. And is there a broader process? You've got something going on here, we all know what's going on, is there anything beyond which permit they apply for that you're allowed to even take into consideration?

Jim Lynch said, yeah, well we have to work within laws of the state of Montana and that the action was they want...they would like the state of Montana issue a 32J which is in law. We have to issue a 32J. That action requires a Montana Environmental Policy under the Montana Environmental Policy Act and environmental review. That drives your environmental document. That is it. I can't, as a state official nor can any state official, assume or presume something beyond what is being asked of us and the action that we're taking.

Alderman Jaffe said, alright, thank you.

Alderman Wiener said, what's the amount of the bond that's going to be required for road damage?

Jim Lynch said, we don't have the total amount yet. That will be determined.

Alderman Wiener said, okay. Under what conditions will the bond be returned?

Jim Lynch said, that we can do, we have a capability, the Department of Transportation, is we can actually analyze a road, go out and take a look at the road condition prior to the movement of loads. We can calculate what impact that load would have under the normal traffic, average daily traffic count that that road has and then look and see after the haul has been done if damage to that roadway is greater than what would normally be decided, it would normally have operated under normal condition without these 200 loads at which time then we would make a claim to the company. Keep in mind that if we see damage prior to that, we can revoke the permits. We don't have to wait until 200 loads have hauled across the roadway.

Alderman Wiener said, sure. So what affect does a half-million pound truck have on a bridge that's built for regular traffic?

Jim Lynch said, actually what you...when you look at the bridges across the state...first of all they have to give us that information as far as what the weight is going to be, how many axels they're going to have, what tire width and what weight per square inch is going to be on that load as it crosses the bridge. It goes to our bridge engineers to calculate whether or not that structure can handle that load that goes over there. Bridges are built...a lot of the bridges that are built across the state are built for a continuing flow of traffic and continuing size. There are oversized, overweight loads that cross our bridges in the state a lot of times. I mean, this is not something that is new, never done before and none of those loads can cross the bridge if it's detrimental to the bridge. That's something we, our engineers have to calculate.

Alderman Wiener said, sure. Well, I don't hold my breath for getting bridges built around here. I'm more worried about the pavement, the roads themselves. So in July, 2009 you presented to Revenue and Transportation and you titled your presentation "Proposed High Wide Corridor Briefing." So what was the entity that was doing the proposing there?

Jim Lynch said, actually what I was advising the Revenue and Transportation Committee, and it was given to them as an advisory that this is a proposal or an opportunity that has been placed to the state of Montana, something that we in the Department of Transportation, between now and the next legislative session is going to have to deal with. There was actually four different meetings so without actually seeing which meeting you're talking about, there's actually four different meetings in which this was discussed from the Revenue Transportation.

Alderman Wiener said, well, as it happens, I've been on the Internet and I brought some clips from the meeting. Oh, the Internet. "Put it back into its original position so they'll do that once prior to moving all this equipment. And I think the idea here is...and when we make this decision at DOT and I think this is why it's very important to involve the communities is we are actually setting the stage for a high wide corridor through the state of Montana to be used probably for things that we haven't even imagined yet. Who would have imagined this would be proposed? Can we only think what might be coming down the line?" So, when I heard that, it led me to believe that what we're looking at is a high wide corridor that's going to be set the stage for, by these permits, when I was watching the presentation today. I didn't see

any of the specifics of what was being discussed there in terms of the turn-outs or the route or really anything that was different from what's in the 32J permit. So I feel like the people of Montana are kind of getting short shrift on this and that Exxon is getting a pass.

Jim Lynch said, well, Mr. Wiener, actually if you'd look at the...if you'd watched the whole presentation, I actually handed out a document that was...this was discussing. It actually showed their route. This was prior to any request, any official request for a 32J permit or a request from an entity to establish, have the state establish a high wide corridor. The state of Montana is not establishing high wide corridor and that was what I was addressing here to the Revenue and Transportation. It's not an action the state of Montana is taking. We did not go before...we're not...this document isn't the Department of Transportation asking the state to establish a high wide corridor and that's what I was talking about at the particular meeting which was very early on. The haulers in the meantime have decided they do not want to establish a high wide corridor. Exxon tells us they're interested in moving these 200 loads and that's what they need the 32J permit for.

Alderman Wiener said, if they were establishing a high wide corridor that crossed three state boundaries, two international boundaries and included using federal stimulus money to expand a port, do you think that would constitute federal action that would require review under NEPA?

Jim Lynch said, that's a hypothetical. You talked about federal dollars...

Alderman Wiener said, it doesn't look very...

Jim Lynch said, if you talk federal dollars, you're probably correct but I'm not...I couldn't tell you that.

Alderman Wiener said, yeah, I mean in one sense it's a hypothetical and in the other sense it's what's happening if you zoom out.

Jim Lynch said, yeah.

Alderman Wiener said, and so that's why I have asked the Council and the City to take the position that a NEPA review is required.

Jim Lynch said, and that's a comment that you're more than welcome to make to the process. You can't make comments to me but you can make it to the environmental document.

Alderman Wiener said, yes, sir. Thank you and thank you for coming down.

Acting Mayor Childers said, thanks, gentlemen. Jon?

Alderman Wilkins said, I'd like to thank you for coming too, Mr. Lynch. That was probably a little bit above and beyond so...

Jim Lynch said, I don't mind at all.

Alderman Wilkins said, my concern is I did travel down Lolo Pass today and I noticed how close the river is to the highway and also noticed where it wasn't really close to the highway was wetlands and the 10-minute rule, so I was wondering how this study when they do the turnouts in that area there, they're going to be close to wetlands, close to the river. Also going down the Blackfoot, you can get pretty close to wetlands, especially when you get through Potomac and you start up on your way to Lincoln there where the trees and everything, the river is pretty close. What did your impact study show when they get close to these rivers and the wetlands in there? Is there going to be impact to the rivers?

Jim Lynch said, in the Environmental Assessment that the engineer, Tetra Tech developed for that particular stretch of roadway, actually for all of it that it does not impact...their proposed modifications existing pullouts or the ones they will build will not impact wetlands. They actually have a detailed map. If you actually...

Alderman Wilkins said, I've seen the map, yes.

Jim Lynch said, you can actually look at where they propose...in fact Lolo from the Idaho state line to I quickly looked through it, I think they're using 15 existing turnouts and I believe only one new turnout that stretch.

Alderman Wilkins said, well, and I saw that too but seeing those turnouts today I'm not quite sure how they would handle a rig of that size and actually met large rigs that took about their whole lane and a good section of the other lane. And the curb, just for me to pull over to let them pass was only like two three foot and then there was the river right beside me. So I'm not...I'm sure they're going to have to redo those. The ones that are existing, they're going to have to make them a little longer and a little stouter and I guess that concerns me, what it's going to do to our rivers and that, but anyway that's my opinion. But the other question I have is, when are they going to start this? Are these 200 vehicles, are any of them going to be running during the winter time or during late fall where we could get sudden sr storms and they could be nice and sunny one day and trapped the next day. I'm concerned about that I'm concerned about what they're going to use for traction if it becomes icy and how that's going to affect the...has that been looked at in the study?

Jim Lynch said, yeah, those would be great comments to make to the document. However, to answer your question is, is they are planning to move 200 loads across in a one-year period of time. So, obviously, they're going to take into consideration whether, when necessary, different events. It's addressed in the Environmental Assessment but if you have concerns on whether traction, whatnot, those are great comments to make to the document which then the company will have to answer those comments.

Acting Mayor Childers said, thank you. Dave?

Alderman Strohmaier said, thank you, Director Lynch for making the trek over. While issuance of a 32 permit may require completion of an EA, what if any discretion does the Department or the state of Montana have in terms of, based on the level of controversy or initial scoping to move directly into an EA as opposed to simply satisfying the minimal requirements of completing the EA?

Jim Lynch said, we have to follow the Environmental Policy Act so whatever, and we won't know what that is until the comment period is closed and what comments we receive and what...and how they're going to address those comments. So I imagine...I can't predetermine anything but that's what the process works. We start with an Environmental Review, we've moved into an Environmental Assessment, they did their Environmental Assessment, they've noted what impacts there are, if any, what they're going to do to mitigate them and now they're available for the public to comment on. Based on what we receive in comments will drive what we do in the future, but at this point I couldn't tell you that couldn't predetermine that.

Acting Mayor Childers said, thank, Dave. Dave, you just did it. Marilyn?

Alderwoman Marler said, thanks for coming over. It has helped me understand a little bit of what's going on with this process in a way. I do appreciate you being here in person. I'm absolutely going to vote for the resolution that's before us because I really think that the EA is inadequate even if we could all agree that all they had to do was the EA to get the permit, the EA itself missed a lot of things and so I'm glad that we're making those comments. The project as a whole probably needs an EIS but the EA to get the 32J permits is inadequate. It did not address a lot of things that we had. That's not the question. Are there still on questions or are comments okay too?

Jim Lynch said, you can make comments to the document, not to me.

Alderwoman Marler said, oh, I'm asking the Chair. Anything? Questions and comments.

[inaudible]

Alderwoman Marler said, procedural question...

Jim Lynch said, I do want to make that very clear...

Alderwoman Marler said, oh, I know.

Jim Lynch said, because we have an environmental process here and you and I can't afford to jeopardize that so the comment period is in place. The comments must be made to the Environmental Document and there's a process for doing that. If you have technical questions of me or the department, those are some questions I may be able to answer tonight or if I can, I can get them to you. That's really all I can do.

Alderwoman Marler said, I understand that. I had a question for our Chair about our procedures.

Jim Lynch said, okay.

Alderwoman Marler said, sometimes we're only allowed questions, sometimes we're allowed both. I guess we're allowed both. So I'm going to vote for the resolution, that the EA is inadequate. It didn't address a lot of things. Also, now that I better understand this whole situation with the 32J permit, I'm absolutely going to be submitting a comment to the document tomorrow, first thing, to recommend that the Department of Transportation deny the 32J permit. That's what I'm going to do and you've mentioned that people can do that until the 14<sup>th</sup> and the comments go to the process, not to you, not to us here on City Council and I was hoping for the record, I have it on my computer here, but for the record could you say where people should submit that?

Jim Lynch said, I think I can do that. Yeah, they can submit it to [www.mdt.mt.gov](http://www.mdt.mt.gov) and just submit it as a comment for the Kearsarge Module Transportation Project Environmental Assessment Overview.

Alderwoman Marler said, wonderful. Thanks for clarifying that. Thank you.

Alderman Houseman said, when you guys go to issue these 32J permits, when did Exxon Mobil come to you and ask for the...?

Jim Lynch said, it's approximately been about a year now.

Alderman Houseman said, a year? So once the corridor is established, let's say Conoco Phillips decides to get some 32J permits, will they have to go through this EA process again?

Jim Lynch said, yes, they would.

Alderwoman Mitchell said, when people apply for the 32J permit, it's because what they plan to transport is oversized or overweight or both? Is that correct?

Jim Lynch said, yes, it's covered under statute. It's a non-divisible load so it has to do with width, height and weight. It could be any of those.

Alderwoman Mitchell said, so if it exceeds those limits, then they need to get the 32J permit?

Jim Lynch said, that's correct.

Alderwoman Mitchell said, but there are no upper parameters. It's just they see this, they have to get the permit but the permit doesn't allow them to go...it has no upper limit.



Jim Lynch said, they actually have to in their application for a permit spell out their dimension and their weight and that's all that...and they can't exceed that. Can I make a clarification? They have to go through the Environmental Review and that drives what doc...I think you said, did you say Environmental Review or Environmental Assessment? Yeah, they have to start with the Environmental Review. The action that we would take, I apologize, I just want to make sure I didn't forget that if someone requests a 32J, the action the Department of Transportation has to take is issuance of the 32J permit and that starts the Environmental Review. That drives the extent of the environmental document. I'm sorry, Ms. Mitchell.

Alderwoman Mitchell said, thank you and one of the comments I hear quite often is that this will provide jobs for people in Montana and as we know jobs are really important, especially around this neck of the woods with our mill closing down, but is there anything in the EA that says Montana people will be employed to do this work? How much...

Jim Lynch said, I don't recall, I'll have to go back and look at it. I do know that they testified in Missoula that they would hire Montana contractors to do the work. I know that was the testimony of Imperial Oil but whether it says it in the document or not, I don't know.

Alderwoman Mitchell said, thank you.

Alderman Wiener said, on the subsequent environment review, if a 32J permit came in and proposed using a corridor in which all the necessary turnouts already existed, would there be any need for any further environmental review?

Jim Lynch said, it would really depend...it would depend...I have no idea...I'm not going to ask, go into hypotheticals with you, okay? If they want to issue [inaudible].

Alderman Wiener said, you answered his hypothetical.

Jim Lynch said, well, his hypothetical was a little bit different. He's asking me if you have to issue a 32J permit, do you have to go through the environmental review. That's not hypothetical. That's the law, yes. You're asking me if all of this took place, I couldn't answer your question. I would be...I couldn't give you the answer to that question unless I know what exactly what they're asking.

Alderman Wiener said, okay.

Jim Lynch said, remember, keep in mind what we're doing here is an action of the Department of Transportation. Okay? And the action that's being asked of us is to issue a 32J permit. That's the action under review.

Alderman Wiener said, and Exxon would probably take a dim view of any wider construct at their request?

Jim Lynch said, say that again?

Alderman Wiener said, I think Exxon would take a dim view of any wider construct of their request.

Jim Lynch said, I guess I don't understand that question.

Alderman Wiener said, I'm thinking they probably would take offense if you said what you're asking for is a corridor and not an oversized load permit. I'm trying to give you the benefit of the doubt here on what the scope of the review is, what it is.

Jim Lynch said, I have to...we have to...the Department of...the state of Montana has to do what we've been requested. We can't predetermine what someone's intent might be. Their intent and their action was to ask us for 32J permits. Okay?

Acting Mayor Childers said, Pam?

Alderman Wiener said, that's their stated intent.

Acting Mayor Childers said, oops, sorry.

Jim Lynch said, that's their request of us, issue a 32J permit.

Alderwoman Walzer thank you for coming in. I apologize if I missed an answer to this question. We have the luxury of having Internet and trying to, you know, search for things so I've been looking at the MEPA, our MEPA policy and the EA, EIS so my first question is, ultimately there's one person who makes the decision of whether or not the EA is sufficient and whether or not an EIS is called for. Am I right on that?

Jim Lynch said, not really. What it is we have to make the determination, MDT, and we'll use all the resources that we have to make that determination but that determination is going to be ours. Now you can challenge that determination, anybody can, but the Department of Transportation is the entity that issues the permit, not an individual.

Alderwoman Walzer said, okay. What I was trying to get to the point is that, you know, ultimately are you the one that's going to be issuing...the EA is sufficient, we do not need an EIS and the preferred alternative is that's laid out with all the mitigation that's laid out in the EA or all of those things that were modified to the Department's satisfaction, that's yours or can you determine that the EA is not sufficient and that an EIS is necessary?

Jim Lynch said, as I said, the Department of Transportation can, I'm not a dictator. Okay?

Alderwoman Walzer said, okay.

Jim Lynch said, okay? Just as your Mayor can't, okay, we have to follow the law and that's what we have to do and that determination will be made by the Montana Department of Transportation. Now am I going to be involved in it? Well, the answer to that question is pretty obvious or I wouldn't be sitting here right now answering questions, or I attended also all three of the public meetings to listen to all the comments, those for or those against. But the decision that is made, the action that is taken, is the State of Montana's.

Alderwoman Walzer said, okay. And, unfortunately, I did something to my computer and lost the page I was on but it does...there was a very simple trying to describe when an EA is appropriate and when an EIS is appropriate. An EIS is appropriate when the EA calls for it or, and they had in quotations "common sense" says that, you know, higher scrutiny is necessary. And so from what we've seen, that the EA says that we don't need to do an EIS but I guess some of us are arguing that common sense from what we have, what we're seeing is that it looks like the EA is insufficient and we need to have somebody step up and say we need more because...appreciating that the Environmental Impact Statement may have enough mitigation put in there that we still, the end result would be the same, maybe with additional mitigation. We don't know the end of what the Impact Statement would put in there but I guess that is kind of what we're...a lot of people are asking for is like what I'm trying to beat around and see if I can get anyone to appreciate that an EA that is being prepared doesn't seem to be sufficient.

Jim Lynch said, and you can make that comment.

Alderwoman Walzer said, and we have and we will. Okay.

Alderman Jaffe said, I thought I was being clear before but maybe I wasn't. So the...what I was trying to just confirm is if there is within the scope of the possible outcomes of the EA, the recommendation that there should be an EIS, whether that's even within the scope of possibilities of the department's authority in the assessment.

Jim Lynch said, actually that's in the guidelines of the Montana Environmental Policy Act, but you can't be arbitrary, there has to be some real reasons for doing so.

Alderman Jaffe said, okay. Can you...?

Jim Lynch said, no, I can't.

Alderman Jaffe said, ...fill out what sort of reason...like what are the types of things that are reasons?

Jim Lynch said, oh, maybe I can. I thought you were going somewhere else, so yes. Say that you, they identified at impact that couldn't be mitigated within the area in which they want the permit, it could be a major impact that it would be substantial. Substantiating impact would drive it to another level.

Alderman Jaffe said, so if the impact was something larger than what was taking place in Montana here? Okay.

Jim Lynch said, no, no, no don't put words in my mouth. The action the state is taking is issuing a 32J and through the Environmental Review process if there was a significant impact identified with the issuing of that permit under that stretch, that could, not would, but could depending on what that impact could be, if it could not be mitigated.

Alderman Jaffe said, okay. The other concern I have...one of my biggest concerns is that they'll just screw things up here and then we'll be left holding the bag. That's ultimately where I'm...what makes me uneasy about the whole thing. So the amount of the bonding is something important for me. I see in the document where it talks about they're responsible for damage to the roadways but is the intent that the bonding or is there even bonding, I guess I haven't seen anything that specifically says that maybe it's in there, but first question I guess is, will there be bonding and if so is it intended to be potentially, you know, for the potential of the destruction of the entire corridor? I mean, like where do you gauge it?

Jim Lynch said, the answer to your question is yes on both accounts and the amount that we'll require will be something that DOT determines is an appropriate level for risk. Keep in mind that, you know, if something happens in load number one and load number two, they don't live up to whatever the conditions were, now I don't want to be pre-assuming anything because we haven't made that decision yet...

Alderman Jaffe said, sure, of course.

Jim Lynch said, okay, you guys are trying to get me in trouble here. If we go all the way to the end and that's what ends up happening, those permits can be revoked.

Alderman Jaffe said, yeah, the thing that I see more...I have confidence in the DOT engineers to measure load, you know, point loads and all that other kind of stuff, do the engineers know that the bridge isn't going to collapse under this thing. What the concern for me more is that the key mode of effects of having these heavy loads, that you, you know, our roads are built and eventually they slowly wear down as we drive on them but, you know, are we causing 25% faster wear and that kind of thing, where it's not immediately obvious that the road has failed but we've sped up the deterioration of our roadways and, you know, ten years from now is when we may have to replace those roads because of the damage. That's more my concern is that there's long-term cumulative affects which will accelerate the deterioration but not outright failure of the roadways. And then also in my hope when considering the effects is looking at some of the secondary things, you know. If we're blocking up the one road, traffic is then going to go to the other roads and those kind of impacts that we'll see at least within Missoula where there are alternate routes. Some of those kind of problems that we might have that we're increasing wear and increasing traffic and increasing, you know, the deterioration of other roads, not just the ones on the corridor. So that's a concern of mine that I'd like...I guess I'll make it as comments later but those sort of secondary impacts are actually being addressed, because it doesn't look like they are, in the document.

Jim Lynch said, well, if you review the document, I mean those are comments you can make and I encourage you to make them, but review the document, when you're talking about loads at 12 o'clock at night, 2:00 a.m. in the morning to 5:00 a.m. in the morning.

Alderman Jaffe said, it's something that's also come up in questions is what about the return trips? Because those would be in the day, right?

Jim Lynch said, that's in the document also and the return trips they aren't carrying as wide of loads so they actually, they have a route and they're coming down Interstate 15 on the return trip and then, of course, they'll come back into Missoula back up over Lolo and over to Lewiston, Idaho.

Alderman Jaffe said, do they need a 32J permit on the return trip?

Jim Lynch said, you know, they may because it depends on what the trailer configuration is when they break down.

Alderman Jaffe said, okay.

Jim Lynch said, if they happen to be wide. They certainly wouldn't be heavy but they could be wide depending on what trailers that they use.

Acting Mayor Childers said, are there further questions or comments from the Council? Questions or comments from the Council? Dave, must raise hand.

Alderman Strohmaier said, I comment not for Director Lynch so if...I'll wait until folks are done.

Acting Mayor Childers said, perhaps we could let the Director sit. Thank you very much for being here and being a good sport.

Jim Lynch said, not a problem. Thanks for inviting me and I encourage you, if you have comments, to make comments by May 14<sup>th</sup>.

Acting Mayor Childers said, alright. Dave?

Alderman Strohmaier said, so first off, I want to thank Jason for his work on this comment that I am fully confident will be submitted. In 1943 Joseph Kinsey Howard wrote his history of Montana or published his history of Montana, titled "Montana: High, Wide and Handsome." In my estimation this proposed undertaking is certainly high and wide but it's absolutely not handsome. I think if anything is befitting of intense scrutiny and the level of analysis required by an Environmental Impact Statement it is a project like this that certainly has the potential to create significant impacts for our community here in Missoula and throughout the state, both short term and long term, so I will fully support this resolution tonight.

Alderwoman Walzer said, yes, I'm going to support both the resolution and for those many who have already provided a comment to us as a City Council and who will be providing, I really urge you to follow the one step farther and make the official public comment to the MDT on this. You can get it through the state website; it's easy to navigate through, through the Department of Transportation's website in commenting on environmental things. I can't remember what the exact terminology was but anyway, but please commenting to us is not official and it helps us make our decision, our resolution will act as one comment, but I hope you all will follow through and go directly to MDT. I'm very glad Jason brought this to us and also included the extra language that I asked him to include about the economic impact that this would have potentially economic impact on our community which all of the same data that I grabbed for that he condensed to something much easier. It just happened to be also repeated in today's proclamation about tourism and travel in Montana. We got it from the same source. It's all available out there for anyone to grab from the Convention and Visitors Bureau, and I'm kind of surprised that's just be ignored in the EA so I certainly hope this goes forward in one that my preference is, is that everything

returns to the normal route that would be normally going through from the Port of Houston but at a minimum that this progresses from an EA to an EIS that better identifies issues and what mitigations there might be. I'm hopeful that in the end the decision would be that there's no good alternative through Montana, that they cannot properly or the cost of mitigating all of the concerns are high enough that the company would decide that the existing route from the Port of Houston is more economically feasible. And I don't want to give away Montana's great resources of our scenic views and the economy that we get from all of that, I don't want to give that away for cheap. And, you know, Lewis and Clark had a hard time going over Lolo Pass and using that as the attempted corridor from the east to the west and they couldn't find a good way through. And I just have a really hard time thinking that these trucks are going to find it just as easy...suddenly decide that it's an easy route to take when in reality it is quite difficult.

Acting Mayor Childers said, Roy, did you have a comment?

Alderman Houseman said, actually I have a question for Chief Muir.

Acting Mayor Childers said, gee, Roy, I thought we were done with questions. Go ahead.

Alderman Houseman said, out of curiosity, how many officers do we keep on patrol from midnight to 4:00 a.m. and has the state or anyone contacted you about policing that corridor...Reserve Street during that period of time?

Police Chief Muir said, depending on the night of the week, you're likely to have between five and ten. The only information that I've had to this point is that all expectations of the Police Department would be with respect to any contract work if they were to...so as to a general impact on the City's budget, we've not been asked to provide anything.

Alderman Houseman said, okay, thanks. Overall I support the resolution. I think that it's good that the City of Missoula will make the comment as a city and I encourage citizens to go out and do that comment individually as well.

Acting Mayor Childers said, thank you. Are there more comments? Further comments? Mr. Haines?

Alderman Haines said, I was just running down through the whereas's here and I think Mr. Lynch laid some of them to rest but this Council, I always thought when we do something stupid, we like to tell everybody it's leadership. I think to continue to vote for this resolution after what we've heard from Mr. Lynch is ridiculous. Talking about addressing the creation of a permanent corridor. If that were proposed, that would take a much greater study and much greater depth than anything that's contemplated here, impacts or otherwise. It talks about doesn't have an adequate consideration of alternative routes. If the company wants to move it, the state has no authority whatsoever to tell them that they have to incur more costs by going a different route. It just is not in our laws to do that. We can analyze what they propose to do, but we have no right to tell them what to do except as may modify the impact on the route they want. And the scoping of the EA was conducted without formal public comment. Well, I then you've heard tonight several times, make your comments and they'll be answered. If the EA fails to weight the cumulative impacts that oversized loads and a high wide corridor, again, I go back, if you're going to have a permanent high wide corridor, that's going to take a lot more study and a much greater in depth analysis. And by the way, the minute that the Lewiston Port came into existence, we started moving an awful lot of traffic over that road and down the Lochsa just hauling wheat. There's an immediate increase in that type of traffic. And the whereas, the EA fails to adequately weigh the incremental losses to Montanans and Missoulians from additional traffic delay. Make your comment. Make them show what will or will not happen. It says the EA does not address where the proposed project intends to direct project employment. There's no law that can do that. You can't pass a law that's going to tell them they have to hire people in Montana. Whereas the EA fails to consider the economic impacts of developing a permanent high wide, that goes back...that's not contemplated. I don't see how you can keep talking about it when it's not what's being asked to do. The proposed high wide corridor cross three state and two international boundaries. The scope of the EA is limited to only one segment of corridor. That's all we can look at because the 32J in the state of Montana we have no authority

whatsoever to analyze what might be the impact on Washington or Idaho or into Canada. And I...whereas, due to the improperly limited scope of the EA, it's not improperly limited. It isn't done yet. You can put all your comments you want of this thing and be heard and get an answer back. Whereas MDT is required to cooperate and coordinate with other state and federal agencies to prepare...no, all they have to do is analyze what's on the roads that Montana has jurisdiction over in order to issue a 32J. So you're not going to get any more than that. And then I think it's based on inadequate scope under-evaluator, under-evaluated impacts and failure to coordinate with effect to...you have to prove that or at least bring it out by a question that they are inadequate in scope, that they're under-evaluated. You have the right to do that and perhaps if you're that concerned, you have a duty to do that, but I think tonight we've heard enough about this stuff and how ridiculous some of the concerns are that we have.

Alderman Wilkins said, well, the way I look at this in the EPA study that's being done and the comments, I will be making my own private comments myself but I will support the resolution on principle because on principle I feel a little like that guy must have felt that, in China, what's the square type, I can't say the word but I feel a little like him standing in front of that tank. And, you know, my comment isn't really on the study though I think it is lacking on maybe about what our water ways and stuff along these scenic highways is. And I really had to deal with this because I belong to a labor's Union 1334 and I'm a retiree from that union and it would be my brothers and sisters that would be doing the flagging. They're the ones that do the flagging in the state of Montana. They're trained to do it and hopefully that would be the ones that would be doing the flagging. But when I went up here today and looked at all that and I tried to weigh in my mind so, alright, maybe 20 or 25 of my people will get to do the flagging but what is this really doing to that corridor along there? And so that's why I'll support the resolution on principle. I think there's things in the resolution that are going to be meaningless of the comment because they don't really address the EPA part of it but as long as we're making comments, you know, I just can't understand them coming down that road. And, you're right, there's been green haulers for 20-30 years going over that road. I guess my biggest fear is, yeah, we do this just for this one outfit, 200 vehicles and that's all this EPA thing talks about is 200 vehicles, but it's a start to something else in my mind, and that's what I would be against. And, you know, the City, the river runs through it and that river happens to be the Blackfoot that they were talking about and all the way up 200 you're close to the Blackfoot and that worries me too, some pristine fishing that could come out of that area. So, I don't agree with everything in our resolution. I'm not sure how good our resolution is; it's just a resolution but I will support it because I do agree with some of it and I'm really worried what's going to happen in the future. So, I'd like to call the question on this so we can get to public comment.

Acting Mayor Childers said, okay, Jon, thanks for your comments. Question has been called. That is non-debatable.

#### **MOTION**

Alderman Wilkins made a motion to call for the question.

Upon a voice vote the motion failed.

Acting Mayor Childers said, you know, I think it did not pass. Do you need a show of hands? No, it did not pass. Alright, Jason?

Alderman Wiener said, permanent high wide corridors is what we're getting and that's why that's what the Environmental Review ought to address. It may just look like a camel's nose in the tent I suppose, but we all know what follows that. It's a metaphor you taught me.

Acting Mayor Childers said, further comments? Ms. Mitchell?

Alderwoman Mitchell said, I plan to be making my own questions and comments. It won't have the fancy whereas's and the therefore's. And I think that Mr. Lynch made it clear that the scope of the EA is limited so when we say it's improper limited, that isn't necessarily true. So I guess I would like to amend the whereas on the fourth one down on the second page for it to say: "Due to the limited scope of the EA,

MDT cannot properly, instead of possibly, determine impacts" and finish the sentence. Because the scope of the EA is doing what it's supposed to do and for us to say that that's improper, I don't think that's necessarily so. It's doing what it's supposed to do, it just isn't...it's just a little bit too limited and MEPA or NEPA would probably be more in order. So that's my motion to amend.

Acting Mayor Childers said, we have a motion to amend. Jason, would you like to respond to that?

Alderman Wiener said, can you restate it or I can try to restate it as I understand it, would then read: Due to the limited scope of the EA, MDT cannot properly determine...I'll accept that.

Acting Mayor Childers said, that's been accepted as a friendly amendment to the motion. Renee?

Alderwoman Mitchell said, and then I just want to say that by submitting this, basically we're submitting a comment so I think what we need to do individually, if we have questions, are to submit questions more directly and more specifically.

Acting Mayor Childers said, does the Council have any more comments to make? Lyn, who I wrote down, I forgot.

Alderwoman Hellegaard said, I'm not going to support this and the reason I'm not going to support it is I find that there's many misleading statements in this so I'll be submitting comments on my own that more adequately affect how I view this.

Acting Mayor Childers said, anyone else? Alright, I've asked the City Clerk to submit the comments, questions and responses from the Director this evening made by the City Council to the Department of Transportation. Is there any opposition to doing that? Alright. Is there anyone who wants to, in addition, add the public comments to this resolution? I see one or two bobbing heads. I'd like to do that separately if that would work.

Alderman Wiener said, that'd be fine.

Acting Mayor Childers said, but the City Clerk wouldn't like that so fine.

City Clerk Rehbein said, well, it's kind of hard to separate your record.

Acting Mayor Childers said, okay.

City Clerk Rehbein said, it's either your record or...it's not a complete record, the entire conversation because it influences your vote. The public testimony you're going to hear tonight will inform your vote and will inform your resolution.

Acting Mayor Childers said, all right, let's do the complete record. Bob?

Alderman Jaffe said, I'd like our resolution, if passed, to be submitted as a resolution from the City Council and then if you also wish to submit, you know, the record of the proceeding it's a separate item.

Acting Mayor Childers said, and they'd be separate items of course. Of course. Alright, Council has chewed on this for awhile. Now if the folks in the audience would like to make brief comments on this, I think that would be wonderful and there's plenty of you so come on, let's get started and maybe you'd like to cue up. Whatever you'd like to do. Please.

Steve Seninger said, I live in Missoula County. I'm a professional economist. I mention that because as I look at the Environmental Assessment, most of the comments that I have to make are in the context of the economic impact and cost analysis in that document which basically I find totally inadequate. I've carefully reviewed the Environmental Assessment document and have looked at it and related it to my 40 years of experience in economic impact and cost analysis and essentially find it to be as a decision

document, which is what MDT is using it as, a totally inadequate document that does not address all the costs and all the impacts for this transportation of equipment to the Tar Sand Projects in Canada. In particular, and I'm not going to go through every point in great detail but just to give you an overview, the documents were really basically inadequate and incomplete by professional standards of cost analysis and impact analysis, and essentially they are inadequate because they assume no job or business revenue loss in Montana's outdoor recreation and tourism industry. The Environmental Assessment is inadequate because it assumes no costs due to big rig accidents. The Environmental Assessment as a decision document is inadequate because it does not go into any kind of long-run cost for MDT's review of supervisory and road maintenance expenditures on the project and it's inadequate because there's no mention at all of any kind of federal dollars that might be used in any of the highway modifications and renovations. I have more detail on those points but rather than take up important time tonight, I would just submit my written statements to the Council's Clerk so that you can have those in the record. In general, I conclude that basically what is needed is a comprehensive Environmental Impact Statement that looks at all the costs to all Montanans, taxpayers, employers, workers, wage earners, etc., all of which is not really addressed in this document. Thank you for your time and I will submit these written comments.

Acting Mayor Childers said, thanks, Mr. Seninger. Would you give them to Dave on the end and we'll pile them up. Would someone else like to comment? Any further comments? Do we have...how many people out there are hoping to comment on this? Great. I thought there was more than two. Would you like to form a line so we can get you up here, please. There's lots of you. Hi.

Michael Phelps said, resident of Ward 4 in Missoula. And first it's a shame that Mr. Lynch has chosen to leave the room already because I would hope that he could hear that he's incorrect in saying there's nothing he can do as a public official to think outside the box on this one. There's at least one thing that lots of public officials have done throughout history and that's resign in protest. In regards to the resolution, in 1989 Exxon Mobil spilled 11 million gallons of oil near Valdez, Alaska causing environmental damage that we're all still dealing with today. And a court ordered the company in 1994 to pay \$4.5 billion in damages to the 33,000 Alaskan natives and non-native fishermen harmed by the spill. Exxon has still not paid up despite posting over \$250 billion in profits in just the last 10 years. Since the ruling over 6,000 of those plaintiffs have died while awaiting compensation. Exxon Mobil flagrant disregard for its responsibility to the people that are affected is merely a part of a long precedented as set. In 1990, a month after Exxon Mobil spilled over a million gallons of oil from a pipeline into the waters between Staten Island and New Jersey, the company was sued by the City of New York for falsifying statements...safety reports after Exxon admitted that the pipelines leak detection system had not worked for 12 years. In 1993, Exxon was sued for knowingly bypassing air pollution control equipment at its Linden, New Jersey Byway Refinery. The same year Exxon heavily publicized a petition...oh, forgive me, I've cut something out to save time. In 1998, Exxon heavily publicized a petition supposedly signed by 17,000 scientists that dismissed the scientific consensus on global warming. The petition was supposedly endorsed by the National Academy of Sciences but the NAS itself later condemned the petition as a fake. In 2000, Exxon was convicted of defrauding Alabama on royalties from gas, wells and state waters and they settled the suit against it and the other nine companies for underpaying the government hundreds of millions of dollars in drilling royalties for federal lands leases. In 2001 they were sued by Texas for extracting oil and gas from state land without permission. And this is the same year that they were sued by the International Labor Rights Fund due to the corporation's complicity in human rights abuses in Indonesia during the Suharto regime. The company contracted the army to provide security for gas projects on Sumatra and villagers were subsequently murdered, tortured, kidnapped and raped. Exxon supplied the barracks as well as the excavators used to dig mass graves. Exxon has given high paying jobs to former White House officials who falsified government reports to favor the oil industry's position, has engaged in practices of union busing around the globe, has violated clean air and clean water acts, it has traded illegally with countries such as Sudan in violation of official sanctions and is responsible for 41 Super Fund sites in 17 states. Exxon Mobil lies, cheats, steals and kills. It does not care about Montana's environment, Montana's economy or Montana citizens. It cares about only money, profits for its shareholders. It cannot be trusted. Companies contracted by Exxon such as Tetra Tech to draft EAs on its behalf cannot be trusted. And if MDT is willing to engage in backdoor talks with Exxon for almost a year before publicizing its plans and is denying and contradicting its own past concerns about



these plans, then MDT cannot be trusted with the public good either. We need more time to review and comment on this EA. We need this assessment to move to federal EIS level. We need to stand our ground against Exxon Mobil. Please approve this resolution. Thank you.

Acting Mayor Childers said, great, thank you. I think I mentioned that we'd like to keep comments to three minutes and must...because people are pretty much doing it. Hi.

Robby Levin said, I'm from...live here in Missoula. And I wanted to address your concerns, Mr. Haines, if you have an ear to spare? Mr. Haines?

Acting Mayor Childers said, and you should address the Chair.

Robby Levin said, okay. To all of us. Okay. In any case you'd brought up some questions about whether this is just a limited un-environmental assessment about 200 loads or if it is actually the initiation of a high wide corridor for the foreseeable future. And I would point out that the infrastructure changes themselves are the corridor. Beyond that it's just a matter of saying okay, we're going to approve these few loads or those few loads or those few loads but the real impact is going on right now of the creation of this corridor. Looking at it in a peace meal fashion as the Environmental Assessment is doing, is in itself inadequate because it is only looking at that when the infrastructure is pointing in that direction. Further, the Port of Lewiston is making its current infrastructure changes under the assumption that this will be going on for the foreseeable future. I'd like to ask again if, Mr. Lynch is unfortunately not here either anymore but if this is only infrastructure changes for a limited number of loads, would they be removing the infrastructure when it's done? I don't think so. The other think is about the adequacy or inadequacy of this particular EA is I did ask them at their public hearing here in Missoula a week and a half ago if they had any plans for what had to remediate an emergency if a load...if a trailer loses its load or falls into a creek or something like that, and after many, many questions they finally had to admit no, we don't have a plan. That is not part of the plan and they said something like, well, we'll amend the plan for that. Well, that's a fairly significant amendment. He said something, we'll hire a crane and I assume cranes that can hold...that can handle 335,000 pounds aren't the sort of things that you just go down to Lowes and pick up, that they need to be on call significantly in advance, if they exist at all in western Montana, which I don't know if it's clear that they do or not. If they do...if a trailer does lose its load, it could take several days, if not longer, to get a crane to the site. It could take several days to assemble the crane, several days for it to do its job and several days for it to disassemble and move out of the way, affectively, closing certain roads for several days or several weeks or longer and so the Environmental Assessment didn't address any of those possibilities, not to mention which it did not mention any of the liabilities that could come out of that. Again, we don't want to be caught holding the bag if there's any major disasters like that. The Environmental Assessment didn't even ask the questions let alone answer them. Obviously if they run over a light pole or an electric line, they would probably pay for it but what happens if they shut down a road for several weeks, say between here and Potomac? What happens to the commuters from Potomac who can't come through, who can't get here? What happens to the businesses that employ them? None of this was addressed in there. The closes, when Ken Johnson at this...the representative from Exxon was asked at the public hearing last week well what happens if we have other incidental injuries like that? And his response was, you can take us to court if you want to. In essence, he was saying sue me. And after the gentleman before me, his record of Exxon's dealing in courts, we can understand what a bad plan that is we are dealing with liabilities. So sue me is not a good plan. Lots more comments but I'll leave it at that for now. Thank you for...I really support this bill. Thank you, you folks, for bringing it up and I urge you to pass it. Thank you.

Acting Mayor Childers said, thank you very much. Howdy.

Cliff Bradley said, thank you for taking public comment on this. I'm a resident of Missoula. On Friday this week I had an occasion to have lunch in Grangeville, Idaho and read the Idaho...the *Lewiston Morning Tribune* discussing the changes at the Port of Lewiston and how this is going to be a high wide corridor for transporting everything from drilling rigs and supplies for the Tar Sands to wind generators and everything. A long editorial. I'd recommend going to *Lewiston Morning Tribune* and reading the plans for this. So I really do support this resolution. This is much, much broader implication than a simple issuing

of a permit to transport a large load. I think there needs to be coordination between the state of Montana, the cities on the route, tribal authorities because this goes across several tribal lands, which I think may make it a federal action. Certainly it can be requested by tribes. So I really support this resolution. We have a habit in this country of reducing things to this permit or that permit and pretty soon they add up to the largest environmental catastrophe on the planet and there needs to be some way that the citizens of this state and the citizens of this country can address these things, so I really appreciate your bringing this resolution because moving this to an EIS does give us at least some broader way to deal with the much larger implications of this. This is not 200 loads. The Port of Lewiston is not being rebuilt for 200 truckloads of supplies. Thank you.

Darryl Armstrong said, from East Pine Street. I was at the Meadow Hills School meeting and I heard what Jim had to say and I heard what Imperial Oil, Exxon Mobil had to say and it seems they were working very tightly together. In fact, I don't know how many of the others that are still here, that were at the meeting got the same impression but we definitely got, we are not going to be able to vote as citizens of Montana on this. We are not going to be able to even, in that meeting, make any statement that goes beyond the narrowest interpretation of the project. We got the overall impression or at least I did, and I got the feeling a lot of other people did too, that as citizens we would be entirely ignored and that includes our comments on the EA. I don't know if that's true or not, I certainly intend to make some but I'm very glad that the City of Missoula is choosing to. We need your official status. As a citizen I will state very clearly on the record, Chief, you should pay attention now because, yes, there will be people that sit down in front of those trucks and I intend to be one of the very first ones, peacefully, quietly but firmly. Okay. To switch hats. I am a veteran of the Missoula Historic Preservation Commission. I was the professional seat on that commission while I was there. I am an archeologist. I have been a federal archeologist and there are significant national preservation acts concerns in this. I talked to Jim about that there. I asked him a public question, he referred me to the Exxon Mobil people who told me that this had been done. I got a chance later on to look at the actual document. It says there are concerns but it doesn't really lay out how the survey was done, whether it was just a record search or if it was on the ground. This is important to be able to determine whether or not adequate archeological work was done. There are historic. There are scenic river corridors here. There is the Lolo Trail. There is historic after historic property including Fort Missoula. We have not got adequate information to look at this and going agency by agency it could be an awful mess. The biggest sections of land as far as I can tell that have federal concerns on this and natural historic preservation acts certainly does that as well, as federal monies laid out but national historic properties and perhaps known sites would be present on the National Forests, it would be present on BLM land, perhaps river corridors, I don't know, it's not my level of expertise but these things really do need to be taken a look at. I have no official standing right now. I'm just a citizen and I really do intend to make some comments and I really would like them heard because I am very concerned about this. Thank you very much.

Zach Brown said, I'm a student at the University of Montana. First of all, I just want to point out that and I think it's prudent to point out that the engineers who drafted this document were in the pocket basically of Exxon Mobil, the richest corporation in the world. This was not some third party and this was not the state of Montana. This was Exxon Mobil telling you what we're going to do and their funding the engineers who came up and made this Environmental Assessment. I do not trust Exxon Mobil to make that decision about Lolo Creek and the Lochsa and the Blackfoot River. Not even one bit. And so then referring to turning this into a public...I've already made my public comments but in short we need an EIS, Public comment needs to be extended and things like this becoming a permanent corridor unless we just want to keep our heads in the sand as the state of Montana, that needs to be addressed. I can't even understand that argument. It's putting yourself into a little tiny box about this is just the law, this is just a permit. The reason that Exxon Mobil is making this a corridor is so they can make millions and millions and millions more in profits. Do you think Conoco Philips is going to say, oh, no I don't want millions and millions more? It's going to become a permanent corridor. Other companies will use it. Trucks will be coming through permanently. This is not a 200-truck deal. I'm a simple guy but I understand that. Lastly, I just wanted to thank you, Mr. Wiener, for bringing this. As a student, I believe you are a representative, right...at the University. You're very, very representative of the student body and you're speaking on behalf of many thousands of students, so we really appreciate you bringing this up and fully encourage you to support this. And just as a second side note, the MDT apparently has put themselves inside a tiny

little box that is this law and this permitting process. You guys do not have to be limited to that box even if it is some sort of a symbolic measure saying that we do not support this and this is not right and this project doesn't make any sense, if it's a symbolic measure, I would certainly appreciate it as a citizen of Missoula because we're not necessarily in a position to make that sort of a high profile far-reaching statement but you certainly are. So I would encourage you to go above and beyond this resolution in the future as well but for now certainly support this resolution. Thank you.

Suzy Rosette said, I am a...I live here in Missoula. I just wanted to commend you first on bringing this resolution to the table, I really appreciate that. I think we all know that Exxon is known for their empty promises and I don't think that we can expect them to keep them up after they've done what they want to do. Also, I wanted to say that I heard that last year Director Lynch made a comment to whatever committee that he had to talk to about this project saying that this will cost Montana taxpayers money and he also said himself that this needs an EIS. I question his motives at this point changing completely what he said just last year to Exxon Mobil's view on this. Also, I wanted to say that I have actually personally talked with one of the truck drivers from the Dutch Trucking Company Mammoet which is the one that will be bringing these trucks through Montana and from what him and his comrades have talked about is that this is not just the 200 trucks. They plan on bringing more than 200 trucks through. He actually said something along the lines of 2,000 trucks that just Mammoet is discussing with other companies to bring through Montana on this corridor. I also wanted to comment on the EA's weight of these trucks and actually the weight of the trucks is significantly more because they're only weighing in on the actual module; they did not include the weight of the module, the trucks that will be pushing and pulling this as well as the trailer. I believe the actual weight is more closer to like 580,000 pounds as opposed to the 300-something thousand pounds that they had originally discussed. So I really...I would really appreciate it if the City Council would pass this resolution, even if it is a symbolic thing. I think that we can take it another step further afterwards and show MDT that, you know, that it's not okay with Montana. We need to do something more and we should allow Montana to stay beautiful and clean and not make this a huge corridor for these trucks. Thank you.

Rita Jenkowski Bradley said, I'm a citizen of Missoula and I thank you for bringing this resolution forward. And I think a second truly independent assessment is needed. The potential adverse impacts are significant. An immediate red flag goes out when I read that the impact listed in the EA overview are predetermined as minimal or no environmental impacts. This should be challenged. Exxon has a history of mishap and contamination of water ways and fragile ecosystems. To state there is only a slight risk of spill of contaminants or hazardous waste with minimal impact, this is also questionable. A load this large over mountain passes and river corridors has a high risk of an accident. Mr. Lynch says that we have to follow the Environmental Policy Act. Well, I would like to look to Montana's constitution which guarantees a right to a clean and healthful environment for Montanans for present and future generations. I think this is being jeopardized. There are other routes available. When Exxon Mobil says this is the least expensive it is because they are not weighing the long-term externalities. Montanans should not be subject to such potential loss when other alternative routes in energy technologies that are less dangerous are available. I encourage the City Council to add an amendment to deny the permit altogether. Thank you.

Sarah Anderson said, a resident of Missoula. I just want to thank you guys for taking the time to consider this resolution and I encourage you to pass it. Thank you.

Beth Judy said, I also want to thank you very, very much for proposing this resolution and I applaud your thoughts, questions and concerns that you've voiced tonight. A few thoughts that I had, I really appreciated Bob Jaffe's point that it's not so much what we're looking at now but it's ten years later and that we discover consequences and then we have to pay for them. I thought that was excellent and that's kind of the pattern that has often afflicted us here in Montana in some of our decisions with industries. I also wondered how many times has or does the Department of Transportation actually revoke permits. That would be something to look into. Do they actually do that ever? And I do think, I do agree...I disagree with Dick Haines about the permanent corridor. His thoughts that that's not important, on a positive note when you make a path, you see it all the time in Missoula, when there's a new bike lane or something and you think, well, that's just out in the middle of nowhere. All of a sudden there's bunches of

people on it and you make a path, people use it and this is going to be a permanent...these changes are going to be in place and there's a lot of activity in the Tar Sands; it's not just the Kears. There's many other projects. They've got lots of plans up here. This is going to be a road that will be open to use and will be used. Let's see. I also was wondering how can we...it sounds like DOT will decide on the bond amount by kind of looking at the road and kind of just looking at the engineering of the road but there are lots of other economic values that I wonder if they will be taking into consideration, the value of wilderness, the value of tourism and all of that. And I don't know how we can support this without knowing how much they will make that bond for. And I also just feel like this is how Montana always loses. We want to help people to do business. We agree in the short run. We're interested in jobs but in the long run we always end up paying. Thank you.

Zach Porter said, thanks again for holding this public comment period. I'm a student at the University of Montana, President of UM Climate Action Now student group and a resident of Missoula. And I've made public comment at the hearing a week and a half ago, made comment at the Public Works hearing recently and I'll be submitting written comment as well, so I'll keep this very brief, but I just wanted to say thanks again for introducing this resolution, Jason, and to everyone who's supporting it on the Council tonight. I hope that we can extend the public comment period. This project requires an EIS under the Montana Environmental Policy Act, much less full EIS review under NEPA, the National Environmental Policy Act. Again, there is no need for these trucks to come through western Montana and Missoula. A route already exists. If economic reasons are the only major factor here, why couldn't we modify I-90 for that matter to allow these trucks to pass through? Clearly that's the only prohibited factor. It's not any matter of geography that prevents these trucks taking another route, it's a matter of economics and there's no reason it has to come through such sensitive corridors as the Lochsa River, Lolo Creek, the Blackfoot, over Rogers Pass and up the spectacular Rocky Mountain front. I really just wanted to say thanks again and like everybody else who's here who won't be speaking tonight, just to raise their hand who came here to oppose trucks coming through Missoula. Would you just raise your hand real quick? Thanks.

Anton Giblingson said, I'm a resident of Missoula in Ward 5. I'm a UM student and I support this resolution. I have already submitted written comments and may submit more but as the resolution points out, the Kears Module Transport Project opens the door to indefinite use of the Montana corridor, raising questions that a simple MDT Environmental Assessment does not answer. And the EA itself points out that having the infrastructure in place will make it much easier for them to get more 32J permits. As Montanans and Missoulians, most of us don't ask for much. We are content with sub-marginal financial situations as they are parents, because our state's beautiful environment more than compensates. However, when something significant wants to happen, something that could indefinitely impact our streams and our wildlife, our drivers and our transport infrastructure, our tourism and our scant economy and even our glaciers and snow-packed in the long term, we ask for a bit more discretion, a lot more education on the issue, a lot more detail, a lot more science and we ask for a wider scope of investigation, an EIS under MEPA and NEPA for sure. I and we thank all of you for considering this resolution and if there's one thing that we all share it's the future so it's good that we're actually thinking about it. Thanks again.

Carla Abrams said, I'm a homeowner on the west side and I urge you to pass this resolution. Thank you.

Acting Mayor Childers said, you're quite welcome.

Zach Creedy said, I'm a aquatic ecologist and I work extensively on Lolo Creek watershed doing research there. There's...it's kind of beyond me how there isn't an EIS done on this already. It's going to get highway money from the federal government to maintain these huge pull-outs on Lolo Creek regardless of what the Montana Department of Transportation thinks. Lolo Creek can't take any more improvements. It's already got tons of problems and I'm here to say thanks for drawing this resolution and I support it.

John Wolverton said, I'm a resident in the Franklin neighborhood which is in Ward 6. I want to particularly thank Councilman Wiener for bringing this up. I urge you to support this and approve it and please do the

right thing. This is a big concern for a lot of people. All the concerns that have been brought up before me I want to second those and there's a lot of global concerns that go along with this also. Thank you.

Acting Mayor Childers said, thanks. Further public comment? Hi.

Patricia Hogan said, I live in Franklin-to-the-Fort Neighborhood too, which is in Missoula and I support this resolution. I appreciate you bringing it up and I've heard a lot of good stuff here tonight so I don't have anything to add to it but I would just like to say that I take Council member Walzer's point about common sense being sufficient to bump this up to an EIS from an EA. If it wasn't for that, we wouldn't need an environmental review, we could just attach the EA as an exhibit to the permit. So let's have an EIS.

Acting Mayor Childers said, thanks. Any further comment?

Barbara Hall, Clark Fork Coalition, said, thank you for taking public comment and thanks for staying so late and I'll be really brief. My name is Barbara Hall and I'm with the Clark Fork Coalition and I'd like to thank Mr. Wiener for bringing this resolution to the Council and I appreciate that you are also well informed on both the project and the EA, so it leaves me really little to say except I think MDT really does need to hear from us that they do have the discretion to do what they are legally required to do under both MEPA and NEPA to take this to the next level and conduct an environmental review under an EIS. And we actually commend MDT because they did take this project a next step initially, even under pressure from Exxon attorneys to do a categorical exclusion on the project, and so we commend them for that to go at least to the EA route and we do think now it's time to go to the next stage. So thank you and I really urge you to pass the resolution.

Acting Mayor Childers said, thanks. Further public comment? Hello.

Reggie Herbert said, I'm a resident of Missoula. I would just like to briefly mention that when asked directly Mr. Johnson, representing Standard Oil or Imperial Oil at the public hearing at Meadow Hill Middle School last week when asked if he would... or if this project would exclusively hire Montanans, and asked if that was a guarantee... or if there was a guarantee that Montanans would be hired for this project, he said that there was in fact no guarantee that Montanans would be hired for any of these jobs involved in this project. He said that they were repeatedly over and over that they were committed to hiring Montanans however there's no wording or any contract anywhere that requires them to do so, so I think it's important that folks take that into consideration. Thank you.

Acting Mayor Childers said, thank you. Anyone else wish to speak? I'd like the record to show when a gentleman asked how many people were here to oppose the Kearsley Modules, dozens of hands went up in the audience. Did you wish to speak, ma'am? Well, yeah, I just need to know when we're done is all. Go ahead.

Neal Bennett said, I'm a student at the University of Montana and a member of UM Climate Action Now, and I'd like to say that I would urge a vote, a yes vote, on this resolution so, yeah. Thanks.

Acting Mayor Childers said, thank you. The floor is still open. Anyone else? Alright, the floor is now closed. City Council members, more questions or comments from City Council members? I see no more questions or comments from City Council members. I'd like to have a roll call vote on the resolution.

## **RESOLUTION 7528**

### **MOTION**

Alderman Wiener made a motion to adopt a resolution of the Missoula City Council commenting on the Montana Department of Transportation's Kearsley Module Transportation Environmental Assessment and requesting the heightened level of scrutiny afforded by an environmental impact statement conducted under the Montana Environmental Policy Act and the National Environmental Policy Act, as amended.

Upon a roll call vote, the vote on Resolution 7528 was as follows:

AYES: Childers, Houseman, Jaffe, Marler, Mitchell, Strohmaier,  
Walzer, Wiener, Wilkins

NAYS: Haines, Hellegaard,

ABSTAIN: None

ABSENT: Rye

Resolution 7528 carried: 9 Ayes, 2 Nays, 0 Abstain, 1 Absent

Acting Mayor Childers said, thank you. That resolution is passed. It will be forwarded to DOT for inclusion in the record as will, are we going to make a transcript of this whole thing, Marty?

City Clerk Rehbein said, there's City Council meeting minutes are transcript of the proceedings.

Acting Mayor Childers said, as will a transcript of this meeting. I want to really thank you all for comir Thanks. And there were some handouts. They should be included as well.

Below is public comment submitted to the City Council during the 5/10/2010 meeting on the Kearsarge Transportation Project:

May 10, 2010 Missoula City Council Meeting  
 Mr. Childers  
 Mayor Engen, Members of the Missoula City Council, Director Lynch of MDT

*Handwritten notes:*  
 need Kearsarge Module Trans Proj  
 5/10/10  
 9:58 AM  
 MR.  
 copy to

Thank you for this opportunity to comment on the Kearsarge Module Transport Project.

My name is Steve Seninger, a resident of Missoula County and a Ph.D. economist with more than 40 years of experience in economic impact and cost analysis.

I have carefully reviewed two documents: a) Kearsarge Module Transportation Project Environmental Assessment, April 2010 and b) Montana Transportation Plan, March 2010 which represent the Documents of Decision upon which MDT is basing its decision to open western Montana highways to module transportation of tar sand extraction equipment for ExxonMobil/Imperial Oil operations in northern Alberta, Canada.

I find these two documents totally inadequate and incomplete by professional standards of economic impact and cost analysis and, therefore, should not be used for making a major decision that the Kearsarge Module Transport Project represents.

In brief, the environmental assessment:

- a) It assumes no job or business revenue losses in Montana's outdoor recreation and tourism industry; b) no costs due to Big Rig accidents; c) no long run costs for MDT's review, supervisory and road maintenance expenditures on the project and d) no utilization of federal highway dollars in any of the road construction/modification activities involved in this project.

The State of Montana and MDT needs to conduct a comprehensive environmental impact assessment and open up the findings to a full public discussion with input and involvement from Montana counties, cities and communities due to the following major deficiencies and inadequacies in the documents of decision:

- 1) MDT is touting this proposal as a job creation stimulus; however, the environmental assessment (Kearsarge Transportation Module Project, [www.mdt.mt.gov](http://www.mdt.mt.gov)) lacks credible, systematic analysis of the actual jobs that would be created for Montanans. The assessment estimates 150 Montana jobs from one-time-only modifications to highways and auxiliary shipment activities. The other job estimates are for already employed workers including those employed by out of state firms. The MDT report assumes there will be no adverse effects on Montana's streams or on the state's outdoor recreation and tourism industry. Potential reductions in out of state visitors from the project would lead to job losses in this \$4.3 billion industry.

In Missoula County alone, outdoor recreation/tourist spending represents more than 3000 jobs. Such jobs and wages are assumed by MDT to be completely unaffected by the big rigs. A reduction in out of state tourists and recreationist would cause job losses in our local economies far greater than the 150 jobs being touted in MDT's assessment.

Note to reader: This comment is addressed to the city of Missoula City Council. As a result, MDT has not provided a specific response but instead is requesting the reader to reference the responses provided to the city of Missoula City Resolution.

- 2) MDT assumes a zero accident risk for the 300+ ton big rigs -- particularly questionable since the 200 shipments, slated to begin this September, will run year long at night over Lolo Pass, through Missoula, up the Blackfoot, over Rogers Pass and up along the Rocky Mountain Front to the Canadian border. A credible and comprehensive analysis would allow for potential mishaps including major accidents that would adversely affect human life, wildlife and the environment. Such accidents would entail cleanup costs along with law enforcement and emergency medical costs and traffic routing issues on the two lane highways. Many of these costs would fall on local governments, communities, and taxpayers. As a footnote, Western Montana highways are not "empty" at night-- Missoula County has on average of 300 single vehicle accidents at night, between 8pm and 4 am every year
- 3) A third omission in the assessment document is an absence of explicit cost accounting for MDT's resources provided in the planning and implementation stage of the project and a reasonable projection of such costs over the life of the project. The Montana Department of Transportation is already spending taxpayer dollars which are not calculated in the environmental assessment. The analysis states that "MDT will cover costs of review of permit applications, review of the EA, construction oversight and normal obligations for road maintenance ." These costs are ultimately paid for by Montana taxpayers with the 'normal obligations for road maintenance' potentially becoming quite significant. The omitted costs to Montana taxpayers would, indeed, be a subsidy to ExxonMobil's tar sand operations in Canada.
- 4) MDT states (Public Hearing Missoula April 29, 2010) that not a single Federal Government highway dollar will be used in any of the highway modifications and renovations required for shipment of tar sand equipment. The absence of federal highway dollars needs to be completely documented and cannot be accepted on face value.

The impending decision by MDT to allow creation of an industrial transportation corridor in western Montana does not address impacts and costs to Montana taxpayers, businesses, and communities. A comprehensive programmatic review of all social, economic, and environmental impacts and their costs should be conducted. Such a comprehensive impact analysis showing the costs and gains to Montana taxpayers should also include the costs of alternative transport routes through Canada. The inadequate assessment conducted thus far does not answer these questions and is insufficient to make a decision with such far reaching effects on our economy and environment.

Respectfully submitted, May 10, 2010  
Steve Seninger, 9601 Cedar Ridge Road, Missoula, MT 59804



1 { I have seen in the news lately that a oil company wants permison to move oversize drilling equipment accross ("our hiways") and we the taxpayer haver no say about this so i ask who pays for any damages they cause not just during the move but long term after the final move??? will the permit cost be adequit top cover (lost tourism bussiness due to delayed detour to another main hiway as well as just plain lost tourist because of them changing plans because of delays and detours???)

**MISTER-GAR@HOTMAIL.COM**

1. See responses to Common Comments L and M.

From: montagne@mcn.net [<mailto:montagne@mcn.net>]

Sent: Thursday, May 06, 2010 2:32 PM

To: MDT Comments - Kearl EA

Subject: Tar Sands transport

**MONTAGNE, JOAN**

1 { I wish to comment on the proposal to truck the massive equipment from Lewistown, ID to Alberta. Is this what all the new construction on the beautiful Lochsa River road was all about last summer?!

1. See response to Common Comment E2.

2 { What a horrible thing to have disrupt Montana! And all for JOBS as our Governor has explained. Once the burning of tar sands has happened contributing to green house gases, the proposed pipeline with its thin walls across Montana will only pollute our State of MT further when ( not if) it leaks.

2. Comment noted.

3 { Please prepare a full Environmental Impact Statement - an EA is not enough when all the cummulative effects are considered.

3. See the response to Common Comment B.

Sincerely,  
 Joan Montagne  
 1105 S Tracy Ave  
 Bozeman, MT 59715



# Montana Audubon

P.O. Box 595 • Helena, MT 59624 • 406-443-3949 • <http://mtaudubon.org>

May 13, 2010

## MONTANA AUDUBON - AMY CILIMBURG

Tom Martin and Dwayne Kailey  
 Montana Department of Transportation  
 2701 Prospect Avenue, PO Box 201001  
 Helena, MT 59620-1001  
 mdtcommentskearl@mt.gov  
 Re: Public Comment on Kearl Module Transportation Project Environmental Assessment

Dear Mr. Martin and Mr. Kailey:

1 { Montana Audubon appreciates the opportunity to provide the following comments to the Montana Department of Transportation on the draft Kearl Module Transportation Project Environmental Assessment (KMTP EA). First, we respectfully request and extension of this comment period.

2 { We have many concerns with the KMTP EA. A primary concern is with the failure of the Department to coordinate with federal entities to require a comprehensive review of this project under the National Environmental Policy Act (NEPA).

3 { We believe the Montana Department of Transportation (MDOT) needs to take a much closer look at this project by requiring an Environmental Impact Statement (EIS) on the creation of this industrial corridor in Montana.

Specifically, we ask that through the EIS process, the MDOT:

4 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;

5 { • Require feasible alternatives to the proposed action;

6 { • Employ the best available and detailed science in analyzing the potential impacts to birds, wildlife and water resources;

6 { • Sufficiently analyze the effects to threatened and endangered species and Montana species of concern;

7 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;

1. See response to Common Comment F1.

2. See response to Common Comment A.

3. See response to Common Comment B.

4. See response to Common Comment C2.

5. See responses to Common Comment D1 and Common Comment D2.

6. See the EA Sections 3.10 and 3.11.

7. See response to Common Comment M.

8 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

8. See response to Common Comment A.

To be clear, this project is integral to implementing what Imperial Oil refers to as its “global execution strategies” to develop inexpensive oil in North America. However, despite statements to contrary, the MDOT and Imperial Oil have recently insisted this project is a one-time and routine transportation project that does not establish a permanent high and wide corridor along the proposed route. We find this difficult to swallow. Once the proposed highway and utility modifications are in place via this project, other entities will be utilizing this route for high and wide shipments for the indefinite future. Therefore, a more thorough review is warranted.

9 {

9. See responses to Common Comments K and S.

Because the KMTP EA does not even consider the direct, indirect or cumulative impacts that will result from the future use of this corridor, it is impossible for citizens, elected official or MDOT to make an informed decision on this project.

10 { We request that the MDOT initiate public scoping under NEPA and engage key constituents in a meaningful environmental review of this project under a joint programmatic Environmental Impact Statement (EIS). This will allow for MDOT to make a well-informed decision on whether and under what circumstances to proceed with this project.

10. See responses to Common Comments A and B.

11 { **The Public Comment Period Should Be Extended.** Given the massive interest in this project and the short time-frame available to interested parties, Montana Audubon requests that the public comment period deadline be extended for at least 60 days. MDOT did not choose to engage the public in an early formal scoping process to define the scope of the environmental review of this project. A central tenet of MEPA is the opportunity for public participation so that the responsible agency can make an informed decision. The approximately 30 day comment period is insufficient for Montana Audubon and interested parties to thoroughly digest this information and provide meaningful and substantive comments.

11. See response to Common Comment F1.

12 { **The Real Issue.** Finally, in these days of extreme risk from catastrophic climate change—placing Montana’s natural resources and economy at significant risk—ignoring carbon pollution is unacceptable. Our Montana Constitution guarantees a right to a clean and healthful environment, and this plan flies in the face of that right. By providing easy and least-cost access to the tar sands of Canada, we are part of the carbon pollution problem. Developing tar sands is egregiously carbon-intensive, and we have to consider the impacts of carbon pollution for Montana.

12. See responses to Common Comments R and P.

Thank you,  
Sincerely,

*Amy Cilimburg*

Amy Cilimburg  
Director of Bird Conservation, Montana Audubon  
amy@mtaudubon.org

Tom Martin  
Montana Department of Transportation

Mr. Martin,

On behalf of the Board of Directors of the Montana Contractors' Association, I would like to offer comments on the Department's environmental assessment (EA) for the Kearl module transport project.

1 { First, we would like to reiterate previous comments that we believe it was unnecessary to conduct an EA for this project, and we urge the Department to not use this experience to establish a precedent for future oversize load permit applications. Once the decision was made to perform a formal MEPA review of this proposed permitting action, the door was opened to the usual litany of environmental concerns expressed by those who simply oppose industrial activity.

2 { Environmental activists have long tried to allege the "cumulative impacts" of proposed State actions should be analyzed in a MEPA review. In this case, the notion the Department should consider the ultimate use of the equipment moving through Montana to its destination in the Canadian oil sands, is nonsense. The scope of the (unnecessary) EA should be solely on the environmental impacts in Montana, which are negligible.

The project will involve several Montana construction companies and will generate numerous high-paying jobs that are desperately needed in our state. We request that the Department grant oversize permits to the vehicles involved in the movement of these modules as soon as possible so people can go to work.

Thank you for the opportunity to comment.

Respectfully,

Cary Hegreberg  
Executive Director

**MONTANA CONTRACTORS' ASSOCIATION – CARY HEGREBERG**

1. Comment noted.

2. Comment noted.

Tom Martin  
 MDT Environmental Services Bureau  
 PO Box 201001  
 Helena, MT 59620-1001

Re: Kearn Module Transport Project

Dear Mr. Martin,

The Montana Environmental Information Center (MEIC) and Sierra Club appreciate the opportunity to comment on the proposed Kearn Module Transportation Project (KMTP) and the Environmental Assessment prepared by the Montana Department of Transportation (MDT).

MEIC is a member-supported organization dedicated to protecting and restoring Montana’s natural environment and has over 4,000 members in Montana and across the nation. The Montana Chapter of the Sierra Club works to protect the landscapes and natural resources of Montana, representing over 1,900 members state-wide. The nearly one million nation-wide Sierra Club members are motivated to explore, enjoy and protect the planet. MEIC and Sierra Club’s members are concerned that the full range of environmental impacts associated with widening a transportation corridor, hauling future loads of massive equipment across Montana, and facilitating continued development of the Alberta Tar Sands and impacts of accelerated climate change, are not adequately addressed in MDT’s environmental assessment.

1 { We believe that the environmental assessment for the KMTP is inadequate and severely flawed because it excluded the public from the scoping process, lacks thorough analysis of reasonable alternatives, and most importantly, does not consider the cumulative impacts associated with creating a permanent “high and wide” corridor that will facilitate movement of massive equipment to develop the Alberta Tar Sands well into the future.

2 { There will be significant social, environmental, and economic effects as a result of the KMTP. Therefore, an Environmental Impact Statement (EIS) that fully addresses the depth and scope of all the environmental impacts associated with the entire project is necessary.

EA fails to analyze cumulative impacts

3 { Our primary concern with the EA is that it fails to analyze the cumulative impacts associated with creating a permanent “High/Wide” transportation corridor through Montana and facilitating future strip mining in the Alberta Tar (Bitumen) Sands. The EA explicitly states in Section 3.2 that *reasonably foreseeable actions* include “future 32-J

**MONTANA ENVIRONMENTAL INFORMATION CENTER - KYLA WIENS, MONTANA CHAPTER OF THE SIERRA CLUB - JERRY NICHOLS, MONTANA CHAPTER OF THE SIERRA CLUB - JOHN WOLVERTON**

1. See responses to Common Comments K, D1, and D2.

2. See response to Common Comment B.

See response on following page.

<p>3 { permit loads using any portion of the proposed route similar to this project,” but the analysis is narrowly limited to Imperial Oil’s (IO) proposal to move 200 convoys through Montana from 2010-2011. MDT’s “Proposed High and Wide Corridor’s Briefing” from July 2009 also discusses that the KMTP will create “<u>permanent</u>” (emphasis added) “High/Wide Corridors” through Montana (page 12). Predicted future impacts of permanent transports of similar equipment are not mentioned anywhere in the EA and should be included in an EIS. We recommend that the EIS analysis provide as much attention to future impacts as it does to the economic benefits of this project.</p>	<p>3. See responses to Common Comments K, S, and B.</p>
<p>4 { Plausible impacts could include deterioration of highway infrastructure such as bridges and road surfaces due to repeated uses, future travel delays, risk of accidents, threats to natural ecosystems, and acceleration of climate change. These impacts are not just limited to the use of these corridors for a year-and-a-half long period. As it states in the EA, modifications to the existing corridor will be permanent.</p>	<p>4. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs. See responses to Common Comments G, H1, H2, H3, I, and P.</p>
<p>5 { Furthermore, this project is directly linked to strip mining in the Alberta Tar Sands and these modifications will facilitate development of the tar sands at least 50 years into the future. According to MDT’s “High/Wide Corridor” briefing, Exxon does not anticipate operations at the Kearl Oil Sands project to be completed until 2060. Therefore, this project will continue to facilitate the irreversible impacts of tar sands energy development on the environment and public health. This includes clearing valuable old-growth forests, severely harming water quality, impairing air quality, and producing 108-125 million metric tons of greenhouse gases each year for the next five decades. The EA completely fails to take into account the economic and environmental impacts of accelerated climate change on Montana, including impacts of pine bark beetle infestations to public parklands and drought on agriculture.</p>	<p>5. See responses to Common Comments E1, K, and P.</p>
<p>6 { The EA also lacks a thorough analysis of the direct impacts of this project on threatened and endangered wildlife species. The area surrounding highways where this large equipment will be transported is essential habitat for grizzly bears and Canada lynx. Mitigation measures proposed in the EA are not adequate to avoid impacts to these species and their habitat. One mitigation measure provided in Appendix D is to provide all highway workers with guidelines to avoid attracting bears to the project sites. These guidelines do not adequately provide measures that will avoid incidental take of grizzly bears or impacts to their habitat. In Section 3.10.2.5 of the EA it says that this equipment will not be moving faster than 30 miles per hour and that the disturbance from these large vehicles will only “be for a brief period of time, and would be only minimally more disruptive than the normal highway traffic light and noise disturbance.” If a grizzly bear is crossing the road and the large equipment is moving down the road at the same time, even</p>	<p>6. See response to Common Comment I. The effect determination for grizzly bears as a result of the proposed module transport project is may affect but would not adversely affect grizzly bears. MDT reached this conclusion upon coordination with the USFWS.</p>

at 30 mph, it will be impossible for the equipment module to avoid hitting the bear. Furthermore, this equipment will have to be well lit and will back up traffic in both directions in essential habitat during the middle of the night. The conclusion that this project will not have significant impacts on threatened and endangered species is flawed and requires further examination.

7 { MEPA requires that MDT examine the direct, secondary, and cumulative impacts of the proposed transportation project. Cumulative impact analysis includes a review of all state and non-state activities that have occurred, are occurring or may occur that have impacted or may impact the same resources as the proposed action. The EA fails to properly analyze direct impacts and future impacts beyond a narrow geographic area and time frame. MDT should prepare a more robust environmental analysis that thoroughly examines all of the current, future, and permanent impacts that are likely to result from this project.

7. See response to Common Comment S.

EA does not comply with MEPA's requirement to analyze reasonable alternatives

8 { MEPA requires that all reasonable alternatives to the proposed action are considered, that alternatives be practical and technically feasible, that the range of alternatives corresponds with the full scope of the issues, and that alternatives receive equal treatment. It is impossible to determine whether the alternative routes listed in the EA are reasonable because there is no comparison between financial or environmental impacts associated with the alternative routes vs. the proposed route. Each of the alternative routes in Canada and the US Interstate System are only briefly described by location and then dismissed because there are no "feasible detours" around overpasses and bridges. Also, there is no discussion about the costs associated with modifying these routes compared to the millions of dollars it will require to modify the proposed route through Idaho and Montana. Furthermore, as MDT stated, a reasonable, feasible and presently utilized alternative route already exists as a High/Wide load corridor through Montana. This route starts at the Port of Houston, TX and travels up through Billings, Lewistown, and Great Falls. According to the MDT, a couple of hundred oversized loads a year travel through Montana on this route. At a July 2009 Legislative Interim Revenue and Transportation committee meeting, MDT Director Jim Lynch said that the western route (along Montana Highway 200) did not provide many opportunities to "get out" if there was an emergency or problem, while the eastern (Billings) route did. The eastern route alternative was not even considered in the environmental assessment and should be included in an EIS.

8. See responses to Common Comments D1 and D2.

9 { The range of alternatives considered by Exxon/MDT and the cursory analysis of those alternatives does not provide the public enough information to determine whether the

9. See response to Common Comment D1.

proposed action is based on an informed decision that weighed the comparative merits of all *reasonable* alternatives.

Scoping and environmental review process

One of MEPA’s primary purposes is to properly inform the public of the environmental impacts of agency decisions. There was no public scoping process to identify all the issues associated with this project prior to the distribution of the environmental assessment and request for comments on April 8, 2010. Although Imperial Oil/Exxon representatives began meeting with Montana state, county, and city agency officials and representatives; Blackfeet Tribal representatives; Montana Highway Patrol personnel; and US Air Force personnel in September of 2009, there was no attempt to involve or inform the public before April of 2010. While a public scoping process is optional if an agency is preparing an EA, MDT was required to prepare an EIS. Moreover, in light of the breadth of this proposal, the complexity of the issues, and the number of people and agencies affected, even the agency’s EA scoping process should have been much more comprehensive.

10 { During the preliminary meetings it was clear that there were going to be broad impacts associated with this project, but there were no requests for public comments until after the EA was published. MDT and Imperial Oil/Exxon should have sought input from the public early on in the process so they could identify and address all the relevant issues associated with this project and perhaps develop a more adequate EA.

In summary, the EA is insufficient for MDT to make an informed decision and to arrive at the conclusion that no significant impacts will occur. Due to the overwhelming, far-reaching, and permanent impacts of the Kearl Module Transportation Project, we agree with Director Lynch’s statement to the interim legislative Revenue and Transportation Oversight Committee in July 2009 that this project requires an EIS, not just an EA.

Sincerely,

Kyla Wiens, Policy Advocate  
 Montana Environmental Information Center  
 Jerry Nichols,  
 Montana Chapter of the Sierra Club,  
 Executive Committee Chair and  
 Conservation Committee Chair  
 John Wolverton,  
 Montana Chapter of the Sierra Club,  
 Energy Committee - Dirty Fuels Campaign Volunteer

10. See responses to Common Comments S, B, and FI.



- 1 { I am concerned about the huge equipment that may travel over our roads on its way to Canada for the Tar Sands. Dev. Although I love Canada and her people this is a dangerous undertaking. I'm asking that you prepare a full environmental impact statement before proceeding.  
Mollie Kieran  
Libby, MT  
Molly Montana  
Molly Montana Real Estate  
406-293-2934 office  
406-293-3407 fax  
molly@mollymontana.com

**MONTANA, MOLLY**

1. See response to Common Comment B.

1



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Telephone (406)442-7582  
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David A. Galt  
Executive Director

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Bruce Williams  
Foresight Consulting, LLC

Lisa Winn

May 11, 2010

Tom Martin  
Montana Department of Transportation  
PO Box 201001  
Helena MT 59620-1001

Dear Mr. Martin:

The Montana Petroleum Association (MPA) appreciates the opportunity to comment on the environmental assessment ( EA) for the Kearsy module transportation project through Montana.

MPA is a voluntary not for profit trade association that represents a variety of members involved in the oil and gas industry in Montana. Our membership includes exploration, development, production, transportation and refining companies providing petroleum products and doing business in Montana.

We support a positive finding from MDT and ask that oversize permits be granted to the vehicles involved in the module move.

MPA has a very serious concern that is being expressed in public comment on the module move during the EA process. We believe that the environmental analysis should be limited to the environmental impacts of the actions necessary to facilitate the move itself. Specifically, there will be construction of turnouts, signal changes, utility changes and traffic control challenges during the move and those items should be the focus of the EA. It is my understanding that all the work is done within the existing right of way for the route in use. These are the items the EA should address.

Our chief concern is that some comments have tried to shift the focus of the EA away from the move itself to question the ultimate use of the equipment once it reaches its destination in Canada. We do not believe this is appropriate. MDT determined that it was necessary for our permit applications to be subject to MEPA because the oversize permit is an "action of the State". Given that understanding, it would set a dangerous precedent for all permitted moves, which number in the thousands on an annual basis, if the reason for the move was called into question. While the Kearsy project is a larger number of individual items being moved, each individual item is no different than any other item requesting an oversize permit to use highways in Montana.

Our members have taken great care to hire a very competent and professional transport company that has given the route considerable analysis. They have visited with all the affected communities, emergency service, and public safety providers. They have worked closely with MDT and taken decisive positive actions on department recommendations.

**MONTANA PETROLEUM ASSOCIATION –  
DAVE GALT**

1. Comment noted.

Page 2  
Montana Petroleum Association  
5/6/10

MPA compliments the department on the way they conducted the public meetings. You were very thorough in your analysis and professional in your presentations. MPA asked that a positive finding be found by MDT after review of the pertinent facts without further delay.

Best Regards:



Dave Galt, Executive Director  
Montana Petroleum Association

**MORRISON, MARY LOU**

Tom Martin  
Helena, MT, 59620

Dear Mr. Martin:

1 { I am just a lowly old lady that came from Kanas to Wy., 50 years ago to teach art. Art teaches all to express themselves with their innate visual/expressive abilities and most of all appreciate what they see and do in this magnificent West. Having skied, back-packed, hiked, etc etc I became a political/environmental activist. I have never felt I was one of the uninformed wild-eyed enviros blasted by most of the oil and gas reps. I well remember my first statement before then Sen. Metcalf, MT and Sen. Cliff Hanson on the topic of stripmining in Wyoming and thereafter the resulting regs on strip mining.

1. Comment noted.

**MORRISON, MARY LOU**

1 { I now write with the news of the ongoing catastrophe in the Gulf, which I predinct will have devistating effects far from its source, environmentally and financially. As Australian mammologist Tim Flannery says in his book "WEATHER MAKERS", the oceans are all interconnected just as is our air, land and water. I am not a resident of MT but please, please do not allow your state to become interconnected in anyway with tar sands development. I very frankly am hoping for a rise in the price of gasoline so that all vehicles driven for work, common travel, recreation, will have to answer to the wasting mentality and addiction of the US. I cannot imagine the damage to all the highways from these trains with wheels. I find it

1. Comment noted.

1 { extremely troubling (to put it mildly) the lack of forced conservation of our natural resources. What always comes to mind when writing, speaking, whatever, is the young man parked, sitting, in front of my house a year or so ago, The stinking, deisel fumes were coming in my front door. I went out and asked him to shut off the motor. I asked him why in this time of needed conservation he was wasting fuel. His answer was: My family has always worked in the oil fields. Needless to say he got a lecture from this former teacher/conservationist.

I have recently returned from a trip to my childhood home in Clearwater, where I grew up on a wheat farm, now being farmed by 3rd and 4th generation family farmers. I saw on my trip only one or two Hummers.....but when I get back to Casper, Wyoming there are Hummers galor...which in the past prompted a bumper sticker.....HUMMERS ARE BUMMERS on my Prius. Enough of this preaching. Tar sands development is devistating.....let Canada screw themselves.

See response above.

Sincerely,  
Mary Lou Morrison, 845 East Third, Casper, WY

Dear, Dwayne Kailey.

**MORRISON, TED**

1 { I am writing you to make clear my opposition of the creation of a permanent 'high and wide' industrial corridor along Lolo Creek, the Blackfoot, and other rivers.

It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands.

1. See response to Common Comment K.

2 { Please conduct a programmatic review for the establishment of this permanent industrial corridor. Also require real alternatives to be considered, as well as provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry.

2. See responses to Common Comments C2 and M.

3 { Please coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts.

3. See response to Common Comment A

Thank you,  
Ted Morrison  
413 Oak Street  
Missoula, MT 59801



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501 NORTH SANDERS #201 HELENA MT 59601 406-442-6600 FAX 406-443-4281 www.mttrucking.org

**MOTOR CARRIERS OF MONTANA - STANG, BARRY**

May 12, 2010

Tom Martin  
Montana Department of Transportation  
PO Box 201001  
Helena MT 59620-1001

RE: Kearn Project

The Motor Carriers of Montana (MCM) its members and Board of Directors appreciates the opportunity to comment on the environmental assessment (EA) for the Kearn module transportation project through Montana.

MCM is a voluntary not for profit trade association that represents a variety of members involved in the trucking industry in Montana. Our membership includes businesses involved in moving goods, freight and machinery through and around Montana including many companies that move equipment and that is classified as heavy haul.

1 { We support a positive finding from MDT and ask that oversize permits be granted to the vehicles involved in the module move.

2 { MCM is concerned with some of the views being expressed in public comment on the module move during the EA process. We believe that the environmental analysis should be limited to the environmental impacts of the actions necessary to facilitate the move itself. Specifically, there will be construction of turnouts, signal changes, utility changes and traffic control challenges during the move and those items should be the focus of the EA. It is my understanding that all the work is done within the existing right of way for the route in use. These are the items the EA should address.

1. Comment noted.

2. Comment noted.

Our chief concern is that some commenter's have tried to shift the focus of the EA away from the move itself to question the ultimate use of the equipment once it reaches its destination in Canada. We do not believe this is appropriate. MDT determined that it was necessary for the

3 { permit applications to be subject to MEPA because the oversize permit is an “action of the State”. Given that understanding, it would set a dangerous precedent for all permitted moves, which number in the thousands on an annual basis, if the reason for the move was called into question. While the Kearl project is a larger number of individual items being moved, each individual item is no different than any other item requesting an oversize permit to use highways in Montana.

Many of our members are more than competent and professional Heavy Haul transport companies. We believe the companies involved in the project have given the route considerable analysis and have went above and beyond what is required to move such equipment in Montana. This was shown by their willingness to have law enforcement personnel accompany and guide the loads through Montana, which is not required in Montana.

MCM compliments the department on the way they conducted the public meetings. You were very thorough in your analysis and professional in your presentations and would hope that decisions made will reflect on the actual move through Montana and not the political views of those who wish to disrupt the industry that is vital to movement of goods in Montana and the US.. MCM asked that a positive finding be found by MDT after review of the pertinent facts without further delay.

Sincerely:



Barry “Spook” Stang  
Executive Vice President

3. Comment noted.

Name: Mick Mulholland  
 Address Line 1: 208 East Main  
 City: Missoula  
 State/Province: MT  
 Postal Code: 59802  
 Email Address: mickey@montanalaborers.com  
 Phone Number: (406) 543-4782  
 Fax Number: (406) 543-0948

Comment or Question:

1 { To whom it may concern, the other night at the Missoula City Council meeting I believe they voted for an Environmental Assessment be done prior to having the Kearsarge Module Transport Project begin. I was curious if this would hold up this project or if the State of Montana, Department of Transportation already has this in place?

Thank you for your time and attention.

**MULHOLLAND, MICK**

1. MDT has developed an environmental assessment for the proposed Kearsarge Module Transportation Project.

Gentlemen:

1 { With the recent history of oil company irresponsibility for profit (BP oil spill) it is equally irresponsible for MDT to trust Exxon to travel through Montana without severe consequences. They and their lawyers are better equipped than us to defend against the inevitable damages that will occur from the passage of their monstrous equipment. And as far as creating jobs is concerned, that's a joke. The jobs that will be created will show up over the years as road repairs that Montanans will wind up paying.

2 { I could go on with things such as economic losses not covered by anyone's assessment, but as important is the precedent this will set for the future despoiling of the Montana environment and the safety of Montana citizens.

Please use common sense and deny this travesty. Exxon has the wealth to do it another way. Don't let their greed run over us.

Sincerely, John P. Mure (proud Missoula resident)

**MURE, JOHN**

1. See responses to Common Comments H1, H2, H3, L and Q.
2. Comment noted.

1 { Thank you for providing the opportunity to submit comments on the Kearsley Module Transportation Project. My primary concerns with the project are limited to ensuring that Montana's road maintenance costs are not permanently increased and that out-of-state travelers have reasonable access to transport information. Specifically, who will determine whether post-transport surface repairs (or repairs to the underlying road structure) are warranted under the agreement? What factors will MDT use to decide which turnouts and other improvements or amendments will be decommissioned? How will MDT ensure that decommissioned features are returned to their prior condition? If some turnouts are retained, what is the expected cost of maintaining them for public use, and will federal highway funds end up supporting the continued upkeep of these additional turnouts? If the described route is used in the future for the transport of additional modules or similar large loads, would the company requesting use of the route be required to compensate the state for the costs of road maintenance and snow removal along all improvements/amendments during the relevant permitting period, even if MDT would otherwise conduct maintenance? Finally, will signage at turnouts or other locations along the route provide a toll-free number so out-of-state travelers can readily access the transport schedule? Thank you for considering these and other comments and concerns.

Alison Mynsberge  
Missoula, MT

**MYNSBERGE, ALISON**

1. See responses to Common Comment L and K  
See Section 2.2.1.7 of the EA.

My first reaction upon hearing this proposal was "not Highway 12!" I have always loved this stretch of road and think it does not deserve the treatments being proposed.

1 { I am aware of the fact that MDT is the responsible authorizing agency and that they recommended an environmental assessment be drawn up. At first glance, the public should at least have more time to consider the proposal and make comments to the EA. I hope that the comment period is extended.

2 { If indeed this proposal is approved, I would love to see Exxon / Imperial Oil held responsible for, at the very least, a clear breakdown of the supposed gains to the Montana economy, a comprehensive contingency plan for accidental load turnover or load loss, and a binding agreement as to the future maintenance of roads, turnouts and bridges damaged by this overuse.

3 { A more comprehensive and inclusive EIS needs to be written in order to capture all the losses and gains of a project of this magnitude. Thank you for your consideration of my points.

**MYQAC@GAYMONTANA.ORG**

1. See response to Common Comment F1.
2. See Section 3.6 of the EA for a breakdown by activity of the contribution to Montana's economy, including salaries and taxes. See the responses to Common Comments H1, H2, H3 and L.
3. See response to Common Comment B.



May 11, 2010

Mr. Tom Martin  
PO Box 201001  
Helena, MT 59620-1001

Dear Mr. Martin,

1 { Please deny Exxon's Imperial Oil proposal to allow for oversized industrial shipments through Lolo Pass, the Lolo Trail, and onward to the Canadian border. The beauty and fragility of this area has changed little since the days of the Lewis and Clark Expedition, and the proposal to industrialize what is a National Historic Landmark and a designated National Scenic Byway is entirely incompatible with these irreplaceable assets.

2 { The region is also known for its abundant wildlife, quality fishing and hunting, and recreational opportunities. Many of the impacted communities' economies are dependent on ensuring that Montana's spectacular landscapes remain unspoiled. Given that nearly all of the economic benefits of this plan are to be enjoyed by foreign companies, but the environmental and economic impacts would be borne by the residents of the state, the analysis needs to account for the economic hardships that would be created by this proposal.

3 { In addition, since the nature of the proposed shipments are focused on sustaining the tar sands mining industry in Canada -- an industry that contributes greatly to global warming -- the analysis should also consider what might be the additional impacts that increased pollution might have on the state.

4 { The current environmental analysis should consider a full range of alternatives. In addition, given the breadth of this proposal, the state of Montana should also seek a federal analysis through the National Environmental Policy Act that would consider the full and cumulative impacts of this proposed action. Based on the absence of both these factors, I urge your agency to deny Exxon's proposal.

Sincerely,

**NATURAL RESOURCES DEFENSE  
COUNCIL CAMPAIGN LETTER**

See Table D-1 for listing of all who submitted this letter.

1. See response to Common Comment N.
2. See response to Common Comment M.
3. See responses to Common Comment E1 and P.
4. See responses to Common Comments A, D1, D2, and D3.

National Wildlife Federation  
 Northern Rockies and Prairies Resource Center  
 240 N. Higgins, Suite #2  
 Missoula, MT 59802  
 406 541 6730

May 13, 2010

MDT Environmental Services Bureau  
 PO Box 201001  
 Helena, MT 59620-1001

RE: Kearn Module Transport Project EA

Dear MDT:

These are the comments of the National Wildlife Federation on the above-referenced project.

The National Wildlife Federation was founded in 1936 as the national voice of state and local conservation groups, and has since emerged as the nation's foremost grassroots conservation organization, leading a dedicated network of members, supporters and 48 affiliated organizations throughout the United States and its territories.

1 { This office strongly objects to the proposed project and to the adequacy of the EA. We have reviewed the EA. Also, two of our staff attended the hearing at the Meadow Hill Middle School in Missoula on April 29. We are dismayed by the narrow scope of issues MDOT is using to evaluate this project. In response to questions, the representatives of Exxon and Jim Lynch of MDOT dismissed altogether suggestions that the EA was an insufficient response to the serious environmental issues left unaddressed and to the absence of consideration of societal problems associated with facilitation of the development of petroleum production for Canadian tar sand oil fields. There are far more serious issues at stake than a 32-J permit from MDOT for an over dimensional load transportation permit and these impacts must be evaluated.

2 { The most serious of these considerations involves whether the State of Montana should be complicit in this Canadian development project because of the impact the project will have on the global environment. There is no more serious issue facing society than finding ways to limit and reduce the concentration of greenhouse gases in the Earth's atmosphere. These threats were fully explored in the 4<sup>th</sup> Intergovernmental Panel on Climate Change (IPCC) 2007 report. In light of the devastating consequences of failure to deal with greenhouse gas emissions, MDOT's concentration on the concerns discussed in the EA is far worse than fiddling while Rome burns; it is fiddling while the planet fries.

**NATIONAL WILDLIFE FEDERATION;  
 STERLING MILLER, THOMAS FRANCE**

1. See response to Common Comment E1.

2. See response to Common Comment P.

- |   |  |   |
|---|--|---|
| 3 | <p>The Exxon representatives at the meeting asserted that all these climatic concerns were considered when the Canadian Provinces finalized their development proposal and that the only issue left on the table was the transportation issues. We completely reject their suggestion that US and Montana laws and long-range environmental concerns regarding the development project are not valid considerations because the Canadian Provinces have made their decision. It is in our global, national, state, and individual interests to find ways to reduce emissions of carbon into the atmosphere. However, developments like this one, which has a huge carbon footprint for each gallon of petroleum produced, goes in the opposite direction. We should insist on a complete US Environmental Impact Statement to assure that this full range of issues is addressed from a larger perspective than it has been thus far. If I have a sibling doing something seriously misguided, our responsibility is not to enable that activity, but rather to try and stop it by using whatever tools are at our disposal. In this case, Canada is our sibling and is engaged in activities that threaten the entire planet.</p> | 3. See responses to Common Comments B and P.  |
| 4 | <p>The EA leaves open for discussion only the narrow engineering and social issues associated with transporting this equipment and completely takes off the table of whether society <u>should</u> be enabling this kind of development. The self-interest of the developers is clear and has been heard. The self interests of the citizens of Montana need to be heard, as well.</p>   | 4. MDT is obligated to reach its decisions based on existing laws. MDT reached this decision in accordance to the applicable laws of Montana. |
| 5 | <p>In addition to this broad consideration of the need for an EIS, there is also justification for requiring an EIS based on threats to endangered or threatened species during passage of this equipment through Montana, Idaho, and Oregon. Assertions that such threats are minimal mirror those made by developers of offshore oil drilling platforms like the one now spilling 5,000 barrels of oil per day into the Gulf of Mexico. On a more local basis, the likelihood of accidents to trucks using Highway 35 around Flathead Lake were also dismissed by MDOT, but we have learned that accidents can, and have, happen that have serious consequences regarding water purity and wildlife considerations.</p>  | 5. See responses to Common Comments I, H1, H2, and H3.  |
| 6 | <p>The EA rejects alternative routes across Canada because these all have restrictions without possible detours and were, therefore, considered to be infeasible. However, the restriction for the Highway 16 route is a bridge with a height restriction about 35 miles east of Prince Rupert. This restriction may be financially infeasible from Exxon's standpoint, but that does not make it generally unfeasible as another bridge could be built. The same is true for the height restriction of an overpass over Highway 1, which is 90 miles east of Vancouver. Modifications to, or detours around, this overpass seem physically feasible and we are not convinced by Exxon's desire to take these off the table for financial reasons. MDOT should not approve a project just because the Canadian routes would cost the Canadians more. Correspondingly, we believe the draft EA does not comply with the MEPA requirement that "realistic and technologically available" alternatives to the proposed action be considered.</p>  | 6. See response to Common Comment D1.   |

7 { We also believe the EA is deficient in its analysis of the cumulative environmental impacts of creating a new High/Wide corridor along the proposed route. This needs to be considered because it is highly likely that once the infrastructure is in place, that the route will become a permanent or frequent corridor for transportation of High/Wide loads through Montana. The EA fails to examine the ".secondary and cumulative impacts" as required by MEPA.

8 { Finally, we found no documentation in the EA about reimbursement to the State of Montana for the costs of preparing the EA. We note that Table 18 (Estimated Value of Environmental Permitting to Montana) appears to indicate that these costs totaled \$1.1 million. It may be that the contractors will reimburse the state for these costs, but we could not find where this was explicitly stated.

7. See responses to Common Comments S and K.

8. See response to Common Comment L.

Thank you for consideration of these comments.

Best regards,

Thomas France, Esq.  
Regional Executive Director  
Sterling Miller, Ph.D.  
Senior Wildlife Biologist

NWF's mission is to inspire Americans to protect wildlife for our children's future.

Sterling Miller Ph.D - Senior Wildlife Biologist  
National Wildlife Federation  
240 North Higgins, Suite #2, Missoula, MT 59802  
Phone: 406-541 6730 | Fax: 406-721-6714 | millerS@nwf.org

Mr. Tom Martin  
 MDT Environmental Services Bureau  
 P.O. Box 201001  
 2701 Prospect Ave. .  
 Helena, MT 59620

Dear Mr. Martin,

I urge you to look very closely at the Kearsarge Module Transportation Project on Highway 12 and 200 for the following reasons:

1. In past years, when the grain trucks were hauling from the Great Falls area to Lewiston, Idaho, the west bound lane of highway 200 was barely passable for some passenger cars because of the ruts in the pavement caused by the heavy loads. Apparently, the Dept of Transportation had no way to regulate the weights on these trucks or chose not to for whatever reasons. What changes in Department policy have been made to not allow damage to the highways that the US and Montana taxpayers will have to pay for. I still see road damage by trucks and trucks exceeding the speed limits. Look at the damage wrecked trucks are causing along highway 35 on the east side of Flathead Lake. I don't see the State having the power to adequately regulate the oversize and over weight loads being proposed. Let's not open the door to bigger problems, we cannot afford them.
2. The weight of the loads proposed by Imperial Oil is far greater than the grain truck loads. The roads are not designed to withstand these kind of loads as evidenced by the grain truck rut problems. The cost to beef up of the highways and bridges to support such weights far out weighs what you are proposing to charge for their use.
3. The environmental impacts of such necessary reconstruction of these highways to support this proposal are enormous. The amount of road base, gravel, and oil required will be huge. New borrow pits, etc will be required. Much of highway 12 parallels Lolo Creek To widen, upgrade the road bed, construct turnouts, and strengthen bridges will be an unacceptable impact on the creek and valley. The same goes for much of highway 200 up the Blackfoot River.
4. We in Montana are not obligated to facilitate the use of our highways for over weight over size loads that will have the impacts of the proposal. Other alternatives exist for Imperial Oil to get their equipment to Northern Alberta. There are ports in British Columbia and Churchill, Manitoba. There are Canadian highways from British Columbia to Alberta. Churchill has a railroad connecting it to the south. Grain is shipped out of Churchill.

**NELSON JR., DONALD**

1. See response to Common Comment L. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs.
2. See response to Common Comment O There are no plans to reconstruct Highway 12 or Highway 200 for the proposed KMTP.
3. See response to Common Comment D1.

4 { 5. The impact of widening and constructing turnouts in Idaho from Lewiston to Lolo Pass will be tremendous. I realize you perhaps don't have to consider this, but the existing drive from Lolo Pass to Lewiston is spectacular and attracts tourists who end up in Montana. Making this a main haul road will have a negative impact on Montana tourism and our economy. People will avoid this route. Triple AAA will wave people off because of the delays.

5 { 6. To think scheduling these loads at night and allowing in them in the winter time will lessen the impact is erroneous. Navigating at night is hard enough and with huge loads will be extremely difficult and dangerous. The same goes for allowing the loads in the winter time. The possibility of a major accident with just the truck and load is a very real possibility. Imagine one of the loads dumped in Lolo Creek, the Blackfoot River, or off Roger's Pass. The physical damage caused by the load going off the road and the potential fuel spill from the truck will cause significant environmental damage. It won't be like the oil spill in the Gulf of Mexico, but it will have a major impact by the time you fish the debris out of the river, stream, or out of one of the canyons on Roger's Pass.

6 { 7. Why aren't the Canadians building the equipment in Alberta?  
They have the facilities to manufacture it there. Do we have to sustain the impacts and costs just so Imperial Oil can get the equipment manufactured in China cheaper?  
8. There are other reasonable alternatives to get the equipment to Alberta. It appears to me that the associated costs and risks to Montana out weigh facilitating Imperial Oils profits.

For the above reasons, I urge the Department to deny the use of highways 12 and 200 for the Kearl Module Transportation Project by the Imperial Oil Co.

Sincerely,  
Donald W. Nelson Jr.  
P.O. Box 487  
Florence, MT 59833-0487  
406-273-2049

4. See responses to Common Comments E2 and M.

5. See responses to Common Comments G, H1, and H2.

6. See the responses to Common Comments D1, D2, and D3.

Mr. Martin:

This message is to alert you that the email address - mdtcommentskearl@mt.gov - provided for the public to submit comments on the Kearl EA, appears to be having problems again.

This afternoon, shortly after 3:00 p.m., I sent an email with an attached pdf comment document on behalf of Northern Rockies Rising Tide, and on behalf of myself and Robert Gentry as individual Montana citizens concerned about this project. The email was returned with a message indicating the email did not go through.

I attempted to call you and Valerie Wilson (who I have been in contact with regarding the previous email system failure and public records requests. In both instances, I was directed to voice mail, and left messages.

While our comments will be timely filed, as they were mailed this afternoon (May 14, 2010), certified and return receipt requested, we are nonetheless concerned that the email address provided is not properly functioning, and that this may deter members of the public from submitting timely comments. We would appreciate your attention to this matter, by quickly remedying any problems with the email system, and by extending the comment deadline to ensure that all members of the public who are attempting to submit comments are able to do so.

Our comments will also be faxed to your office this afternoon, in order to ensure a copy is received today.

Thank you in advance for your assistance,

Summer Nelson

Summer Nelson Law Office, PLLC

cc

Robert Gentry Law, PLLC

Northern Rockies Rising Tide

## NELSON, SUMMER

1. See response to Common Comment F2.

Mr. Tom Martin,

1 { Your EA and the MEPA Review of this project were a waste of tax payer dollars and another example that Montana is not open for business. With the economy in dire straits and the highest rates of unemployment in years it is absolutely ridiculous for MDOT to hold this project up, issue the permits and put Montanans back to work!

Thank you,

**Mike Newton**  
**Operations Manager ~ Glendive**  
**Fisher Sand and Gravel Co.**  
 PO Box 1246 ~ Glendive, MT 59330

Toll Free: 1 800 775-3383  
 Office: (406) 687-3383  
 Cell: (406) 939-2188  
 Fax: (406) 687-3345  
 E- mail: [mnewton@fisherind.com](mailto:mnewton@fisherind.com)

**NEWTON, MIKE**

1. Comment noted.

Comment Recipient,

1 { Please reject the proposal to move oversized trucks on our roadways and through our neighborgoods. Wilder roadways will increase traffic speed endangering travelers as well as wildlife. A full environmental impact statement is needed for this project.

2 { Imperial Oil plans on inconveniencing local US communities so it can move forward with it's pollution filled project backed by Exxon Mobile, who has a terrible track-record of accidents and spills destroying multiple ecosystems in it's path.

Keep our communities, roadways, and wildlife safe by keeping Imperial Oil out.

Thank you for this opportunity to comment.

Jennifer Nitz  
 722 8th St  
 Helena, MT 59601

**NITZ, JENNIFER**

1. See responses to Common Comment G and B.

2. Comment noted.

To whom it may concern:

As a concerned recreationalist and citizen of Missoula, I am greatly concerned about the plan of Imperial Oil to transport their pre-assembled modules along the Montana road system.

1 { My first concern is that of the environmental impact. For a project of this magnitude, an EA is not enough. A thorough, unbiased EIS should be conducted.

**OAKLAND, JENNIFER**

1. See the response to Common Comment B.



2 { Who will be left holding the expense of this expansive system once this project is completed? I am guessing the taxpayers.

3 { There is no guarantee from Imperial that ANY Montana-based businesses will be used for any of the construction. How will this benefit Montanans? It wont! An important tourist industry damaged; local trucking firms that cannot make their delivery deadlines; fishing and raft guides who'll have a harder time conveying the natural and scenic values of their trade; rural emergency services patients that will have a harder time getting to the ER within the "golden hour"; more impaired stream miles due to sedimentation, sanding and salting; our future road dollars diverted to fix the shortened life-span crumbling road and bridges; etc. etc..

4 { There are a tremendous number of problems with this project, before even getting into the list of devastating impacts of Tar Sands mining in Alberta.

5 { There are alternatives that Exxon/Mobil could and should consider.  
I strongly urge you to restore a longer comment period for the citizens, require a full EIS to be completed, and deny this proposed project, in the interest of concerned and affected Western Montanans.  
Regards,  
Jennifer Oakland  
Missoula, MT

- 2. See the response to Common Comment L.
- 3. See responses to Common Comments Q and M.
- 4. MDT does not anticipate increased salt or sand usage on the roadway. See the responses to Common Comments J, H3, O, and L.
- 5. See responses to Common Comments D1, D2, D3, F1, and B.

Martin Oakland  
Missoula, MT  
No Affiliation

**OAKLAND, MARTIN**

1 { I am apposed to the KMTP. Please do not support this project. It is a silly use of resources. We should not support or enable these types of project: short-term gains for long-term costs!

Please consider my opinion.

Thanks,  
Martin  
Martin Oakland  
Hydrologist  
FSR Consultants, LLC.  
Missoula, MT  
martin@fsrconsultants.com  
406.531.8189

- 1. Comment noted.

1 { Do not grant a permit for transport of tar sands oil extraction equipment across Montana. If we use 40 billion dollars per year as a profit figure for Exxon, the 68 million dollars that Montana would get represents about 16 HOURS worth of profit (Exxon gets around 110 million per day). The point is, that if CANADA has decided it wants to trash its environment by digging up the tar sands, then CANADA can transport the machinery and risk the multiple potential money-costing problems that may result from the transport. The potential loss of tourist income, damage to roads, environmental degradation of streams, loss of economy due to delays, and the potential for an accident that would create further hardship is not worth 68 million dollars or any figure. It is laughable to think Exxon will hire Montanans for the work -- and it is not a real sustainable job anyway. It is a 200 trip job. There has been no detailed economic impact analysis of this permit. Additionally, when the 200 trips are over, there is NO contingency to restore the roadways to their previous condition so that we do not see this transport corridor operating into the future.

Exxon is not giving Montana 68 million dollars. It is dangling a bright glittery thing that has the Montana government and DOT grasping at a short-term gain at the expense of our long-term (and short term) economies and environmental impacts. Do NOT allow this permit.

Dave Oberbillig  
503 Linden St  
Missoula, MT 59802

**OBERBILLIG, DAVE**

1. See responses to Common Comments M, L, I, O, and Q.

1 { I am shocked that the state of Montana would willingly jeopardize one of Montana's greatest environmental, scenic, wildlife, and economic assets--it's riverways---all to help out private corporations develop the Alberta Oil Tar Sands--and that we'd do this without a huge, comprehensive review.

2 { If we create a permanent high and wide' industrial corridor along some of Montana's most scenic river ways, the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands.

Our state and our people need to stand up and at the very least give this much much more review--I support the following steps:

Please:

- 3 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 4 { • Require real alternatives to be considered;
- 5 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;

**OBERBILLIG, DEBORAH R.**

1. Comment noted.
2. See response to Common Comment K.
3. See response to Common Comment C2.
4. See responses to Common Comments D1, D2 and D3.
5. See response to Common Comment M.

- 6 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Sincerely,  
Deborah Richie Oberbillig  
503 Linden St  
Missoula, MT 59802

6. See response to Common Comment A.

MDT,

I live in the Blackfoot River valley and am adamantly opposed to the KMTP plan for a number of reasons:

**O'CONNELL, GERARD**

1 { 1. **Extend the public comment period on the EA by 90 days:** Having the Imperial Oil responsible for doing its own EA is an extreme example of fox-guarding-the-hen-house. **Of course** it will show that all problems will be properly mitigated. Allowing only 30 days for the public to find the flaws that are surely buried within that burdensome document is patently unfair to the citizens of Montana.

1. See response to Common Comment F1.

2 { 2. **Imperial Oil should be required to post an infrastructure repair bond:** Much of the Montana highway infrastructure (bridges, highway, shoulders, etc.) proposed for this transit was not designed nor built with these extraordinary loads in mind. Even if these trucks don't do immediate obvious damage to culverts bridges or shoulders, they will clearly be impacting the lifespan of all infrastructure along their route. Should these extreme loads weaken a culvert sufficiently to cause its collapse 20 years before its time but a couple years after the big rigs are gone, we as taxpayers will be picking up the tab. This same logic applies to all the highways to be travelled by the big rigs. Accordingly, Imperial Oil should be required to post a 20-year bond (e.g., \$10 million) sufficient to cover these potential costs.

2. See response to Common Comment L.

3 { **Tell them to consider taking it through the Northwest Passage:** This plan has been underway for many years and their short list of delivery route options was defined several years ago. Meanwhile, in the past 12 months the Northwest Passage has opened up for the first time in recorded history (attributed to long-term global climate change), with several commercial ships already having successfully completed this Arctic Ocean transit above North America. This opens up a new option for Imperial Oil, allowing them to barge the equipment around the northern shore of Alaska to reach northern Alberta. The equipment could then be trucked overland in winter on ice roads and frozen tundra to reach the tar sands region. I

3. Early analysis indicated this route was not feasible.

<p>3 { would like to see Imperial Oil provide a cost-comparison of this alternative, as it would seem to be a very cost-effective option.</p> <p>Thank you for reading this far..  Gerard "Jerry" O'Connell  35701 Nine Mile Prairie Rd.  Greenough, MT 59823  (406) 244-5612</p>	<p>See response to comment 3 on previous page.</p>
<p>Dear MT Dept. of Transportation:</p> <p>I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:</p> <p>1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;</p> <p>2 { • Require real alternatives to be considered;</p> <p>3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;</p> <p>4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts</p> <p>5 { All that is being requested is a full analysis of the effects of a plan like this transportation corridor on the route, which to date has not been done and may not get done before approval. Currently, the proposers of this plan have shown little if any contingency planning for problems, much like the well that was drilled in the Gulf at 5000 feet that now is a major issue. There are expected economic benefits to Western Montana with this, but a full analysis is needed. Once this route gets approved for this project, it will be established and utilized in the future.</p> <p>John O'Connor, Missoula, MT</p>	<p><b>O'CONNOR, JOHN</b></p> <p>Form Letter 1</p> <p>1. See response to Common Comment C2.</p> <p>2. See responses to Common Comments D1, D2, and D3.</p> <p>3. See response to Common Comment M.</p> <p>4. See responses to Common Comment A.</p> <p>5. See responses to Common Comments H1, H2, and H3.</p>

Hello,

1 { My name is Julie Oldfield and I am a student at the University of Montana. I do not support the Kearsarge Module Transport System Project. I believe that MDT would be making a mistake by issuing the appropriate permits to begin road construction to establish a "high and wide" corridor through Western Montana. Not only do I think that the current Environmental Assessment fails to appropriately address the environmental impacts of the project, but I think it fails to take into account the larger environmental impacts that the project would have (relating to climate change). I want to keep this comment short, and I'm sure you have already heard information about how Tar Sands Mining contributes to the buildup of atmospheric greenhouse gases which are causing global climate change, so I won't go into detail. However, we do need to have a complete Environmental Impact Assessment of the project.

2 { By establishing a high and wide corridor we are opening the floodgates for other oil companies to access the Alberta Tar Sands. The suggestion that because the current plan only encompasses the movement of 200 trucks means that this fact should not be taken into account completely ignores the reality of the situation. I do not want my

3 { home to be permanently altered so that oil companies can continue to support one of the dirtiest, most environmentally destructive projects on earth. I believe that the beauty of Western Montana would be forever scarred and that we would simply become a stepping stone, or a means to an end, for oil companies. I want my home tar sand truck free!

Name: Julie Oldfield  
 Address: 423 West Central Ave Missoula, MT  
 Email: julie.oldfield@comcast.net

**OLDFIELD, JULIE**

1. See responses to Common Comments K, E1 and P.
2. See response to Common Comment K.
3. Comment noted.

Hello,

1 { My Name is Gavin Oss and I live in Missoula, MT. I am an avid woodland recreational user. I am very aware of how development can impact the enjoyment of nature for us all. My understanding of this proposed change to highway 200 requires a radical redressing of the road to absorb the increased stresses that the movement of such heavy equipment produces. While this may seem like a benefit it also brings a long term potential for altering economic and social patterns as well as the environmental conditions in western Montana. These changes can not be just haphazardly viewed as a wait to see policy; we have a unique ability to plan and focus the trans-formative energies that communities experience however allowing a simple one year forecast done by those who are financially invested in the short term and who have no connection to the people or places it effects seems like a recipe for long term harm. I would like to state that a full environmental impact study done by local forest service, community representatives and other affected people be completed before we act on something that will reverberate for decades from now.

2 {

Thank you,

Gavin Oss  
Missoula, MT

**OSS, GAVIN**

1. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs. See response to Common Comment G.
2. See response to Common Comment B.

I would like to comment on the proposal to transport big rigs across Montana for the benefit of ExxonMobil. I see no realistic benefit to Montanans beyond a few short-term jobs. Further it is impossible for me to believe that there will be no costs to Montanans. There will no doubt be increased maintenance cost due to the heavy loads . Your impact analysis seems to assume there will only be minor inconveniences to local businesses as rigs go by. In fact there will be multiple sequential inconveniences all along the route, which will have detrimental effects on Montana residents and certainly will discourage tourist, Montanans and out-of-staters from visiting along these routes for fear of running into one of these things. Additionally you seem to believe there will be no accidents. While this is possible the costs to state and local governments and the potential for disastrous impacts on our waterways and forests, both public and private appear large, uncalculated and should such an event or events occur, likely irremediable.

2 { I believe even a cursory read of this proposal by any lay person says that this proposal has few positive effects, clear costs and negative effects, and the potential for multiple disasters. I urge the rejection of the proposal in the strongest possible terms.

I am writing as a private citizen. I work for the Western Montana Mental Health Center and as such have no relevant affiliations.. I have based my opinions on your web site information and Missoulian articles and letters to the editor.

**PALMATIER, JAY**

1. See responses to Common Comments M, G, H1, H2, and H3.
2. See response to Common Comment N.

Thank you for this opportunity to comment.

Jay R Palmatier  
 10633 Oral Zumwalt Way  
 Missoula, MT 59803

**PATTEN, TED**

1 { I believe this issue needs more study, or perhaps a bit more transparency, before allowing these rigs on Montana highways.  
 Aren't these loads going to be too heavy for our roads?  
 I haven't heard about how the highways will be impacted or how much damage might occur.  
 Ted Patten  
 tedpatten@centurytel.net

1. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs. See response to Common Comment L.

Tom Martin  
 MDT Environmental Services Bureau  
 PO Box 201001  
 Helena, MT 59620-1001  
 RE: Kearl Module Transport Project Environmental Assessment  
 Dear Mr. Martin,

**PAWLOWSKI, JOANNE**

1 { The KMTP will create a permanent industrial transport corridor through some of America's most treasured scenic areas. The project involves two US borders and four U.S. states. There must be a full Environmental Impact Statement, not just an Environmental Assessment.  
 2 { Routes 287 and 89 traverse the Front country, notorious for powerful wind storms that have been known to knock over truck trailers. The module transporters rely on a complicated real-time hydraulic leveling system for their safe operation. What will be the effect of extreme sidewinds on a 30 foot high, 100 foot long module trailer and its hydraulic leveling systems? I am concerned that the EA makes no mention of this question, and does not address whether extreme winds (and wind gusts) could create instabilities in the leveling system, incapacitating the transporters and/or increasing the possibility of accidents.

1. See response to Common Comment B.

2. Comment noted.

3 { Additionally, the only reason for this project's existence is to accelerate the development of the Alberta Tar Sands. The Alberta Tar Sands will contribute significantly to global warming, yet the EA fails to account the for the economic and environmental costs to Montana of this increase in temperature.

3. See response to Common Comment P.

Sincerely,  
 Joanne Pawlowski  
 92 Horatio St.  
 New York, NY 10014

To whom it may concern:

1 { **I do not support** the modification to our highways, trimming of trees, modification of signs or utility wires for the movement of large oil extraction tools and equipment through Montana and my town of Missoula. The reason for this is that this is not a one time move, once they get they go ahead and make all the necessary changes they plan to move more equipment to this huge oil sands project. The tar sands project is the largest such project that has ever been undertaken in the world!!!!!!

2 { We need to understand that the use of fossil fuels is contributing to the change of our environment. We can not support this dirty business transaction to take place between imperial oil and other large business at the expense of future generations, just for the short gain of a few extra dollars.

3 { Do Not Support large business getting there way, and laughing all the way to the bank.

Troy Payton  
1285 River Street Missoula, Mt 59801  
Registered voter

**PAYTON, TROY**

1. See response to Common Comment K.
2. See response to Common Comment E1.
3. Comment noted.

1 { I'm a concerned citizen urging you to please prepare a full environment impact statement before issueing a transport permit for the massive movement of equipment across Mt. to Canada for coal extraction.

**PEEPLS, RON**

1. See the response to Common Comment B.

1 { unless and until these guys have an effective plan to deal with any unexpected accidents or incidents do NOT approve this. Think Gulf of Mexico, flaming pools of oil, dying animals and economies, do you really believe this Corporation when they say something could NEVER happen? Yes, we need jobs, but not jobs cleaning up a disaster!

**PETERSEN, BOB**

1. See responses to Common Comments H1, H2, and H3.

bob petersen  
bobajabob@gmail.com  
2035 South 11th West  
Missoula  
(406)274-3156

1 { I believe that's what the Highway system was built for. Move people and commerce. Must we complain about everything?

**PETERSEN, DAVE**

1. Comment noted.



1 { Please JUST SAY NO to Exxon Mobile for requesting permission to bring their rigs over our highways and through our beautiful scenery for a year. This company made enough money last year to fly, float and/or drive these rigs around the world and they have the audacity to try to buy their way into Montana to disrupt and destroy our roadways, not to mention our peace, quiet and access to our own roads. What's wrong with this picture? Equipment made in Korea bound for Canada travels through Montana. Let Exxon Mobile build the roads in Canada for their need to get this equipment to its destination. No trade-offs are worth this plan.

2 { I know you didn't ask for this and need input in making a decision. Hopefully, enough people who treasure our state will voice their dissents and not give in to money and a promise of jobs. Please don't let our state be "bought out." JUST SAY NO. PLEASE.

Thanks,  
 Hazel Pflueger  
 214 Pine Ridge Rd.  
 Florence, MT 59833

**PFLUEGER, HAZEL**

1. Comment noted.

2. Comment noted.

Hello,  
 My name is Leea Pittenger. I live at 631 W. Crestline Dr., Missoula, MT 59803. I have no affiliations to report.

1 { I would like to comment on the project involving transport of equipment through Montana for the purpose of oil mining in Alberta. First, I think Canada's plan to mine an area the size of Florida is really frustrating. We have just witnessed the devastating consequences of a mine gone bad off the coast of Louisiana. The area Alberta proposes to mine will be destroyed. I do not think we should support these efforts by allowing the transportation of the equipment through Montana or any of the United States. You may argue that this is not your decision, and I would disagree with you. It is a decision to be made by all of us, individuals and agencies. Why should the DOT not be able to speak out about ethical decisions? The DOT makes ethical decisions based on wildlife and scenery in regards to other projects. This is no different and has far wider implications.

2 { Secondly, I think the plan to move the equipment through Montana has too many loopholes. What if there are emergencies? What if the roads can't take the weight? We are all tired of the Hwy 93 construction. Will we just have to start up on Hwy 12 and 200 after these rigs tear up those roads? What about the delays in regards to tourism and day-to-day life?

3 { I think we should turn this project away based on the ethical implications as well as the cost and inconvenience it would create.

Sincerely,  
 Leea Pittenger

**PITTENGER, LEEA**

1. See response to Common Comment E1.

2. See responses to Common Comments H1, H2, H3, G, L and M. MDT has established the maximum transport vehicle axle loadings to comply with road and bridge designs.

3. See responses to Common Comments L and G.

May 14, 2010

Zack Porter  
 President, University of Montana Climate Action Now  
 519 E. Front St.  
 Missoula, MT 59802

Thank you for conducting this public comment session. The proposed actions being considered as part of the Kearl Module Transport Project (KMTP), represent *significant* impacts to human and natural environments, and set the stage for the creation of a high and wide corridor through Western Montana – despite repeated claims by MDT that this project is simply for 200 shipments (which while accurate, signifies gross ignorance and negligence on the part of a public agency like the MDT, whose mission is to look out for the public good).

As a resident of Missoula, and as president of University of Montana Climate Action Now, I call on the Montana Department of Transportation to:

- 1. **Extend the comment period to 90 days, immediately.** As was shared at the public hearing at Meadowhill Middle School in Missoula, Imperial Oil/ExxonMobil has been in contact with MDT for over one year, while the public has only just learned of the proposed actions. Many Montanans who would be most affected by this project are in the dark – they have had little time to gauge the impacts on their communities and lifestyles, and it is MDT’s responsibility to ensure full disclosure of project details and maximize public participation to guarantee a wise decision is made.
- Conduct a full EIS analysis under MEPA.** The impacts of this project on riparian areas, local tourism and recreation based economies, road infrastructure, and emergency medical services are significant, and there is extensive public controversy over the issue. The EA is inadequate, and gives lip service to the very real impacts this project will have. Findings of “no impact,” “no effect,” and negligible impact” to things such as water resources, threatened and endangered species, wildlife and fisheries, noise, parklands, and historical and archaeological sites (as outlined in the EA), are a complete failure in analysis. Noise impacts in the middle of the night to small communities, impacts to historic trees and structures in towns such as Augusta and Choteau (as protected under the National Historic Preservation Act), impacts to wildlife and fisheries with new construction in riparian areas leading to increased surface runoff and decreased riparian habitat, threats to water quality should a truck go off the road (which is a very real threat along the Lolo Ck and Blackfoot corridors), are *all significant*, and *warrant challenges in courts* should MDT fail to consider them.

**PORTER, ZACK**

1. See response to Common Comment F1.

2. See response to Common Comment B.

3 { 2. **Consider the cumulative impacts of use of this corridor.** It is a blatant lie, that MDT, as Director Jim Lynch claims, has its hands completely on this project, and that it can only consider these 200 trucks, and no others. MDT has the responsibility and the administrative discretion necessary to view this project as it is: the first of likely dozens or more proposals to carry this type of road damaging, bridge bending, equipment through Montana and to Alberta. The Port of Lewiston has been in close contact with several multi-national oil corporations, including Shell and ExxonMobil, and it is clear that the Kearl Module Project is only the opening of the floodgates. **MEPA requires full analysis of cumulative impacts of proposed actions.** In this case, as opposed to future permit requests, road construction is necessary to allow these trucks to proceed. Once this road construction is complete, it will be far easier for future shipments to receive permits, beginning a decades long high and wide route through the most pristine river valleys in Montana, both of which (the Lolo and the Blackfoot) pass through the largest blocks of protected wildland in the lower-48 states. **It is only logical to consider this permit in complete consideration of the future use of this corridor, anything short of that is a gross violation of MEPA.**

4 { **Considier a full range of alternatives.** The alternatives, as currently considered by the EA, are artificially constrained and represent a failure in analysis. At the Missoula Public Hearing, Imperial Oil/ExxonMobil admitted that their motive for choosing the proposed corridor was a matter of economics, and not geography. First of all, the **ROUTE CURRENTLY IN USE** is not considered as an alternative. At the moment, this equipment is shipped through Houston, TX, to Alberta. Other routes between Thunder Bay, Ontario, and Alberta have also been used in the past. Even though those routes are outside of Montana, **they are required by law to be considered as alternatives under MEPA.** After all, SO IS the route that was considered through British Columbia through Prince Rupert. Alternative routes were disqualified because **it would have cost more money to modify those routes,** than this one. **That is illegal under MEPA.** The preferred alternative, the route over Lolo and Rogers passes, similarly requires road improvements to become feasible. WHY THEN are the other routes somehow disqualified? After all, this route is infeasible, and should be disqualified, in that line of thinking. Without the significant road improvements, these shipments would not be possible.

5 { 3. **Consider all secondary/indirect impacts as required by MEPA.** MEPA requires analysis of secondary impacts of proposed actions. In this case, the release of greenhouse gasses at the Fort McMurray tar sands, which will be an indirect result of this project, have a significant impact on Montana’s economic wellbeing, much less its ecological health. The Tar Sands are the single largest contributor to climate change in

3. See response to Common Comment S and K.

4. See responses to Common Comments D1, D2, and D3.

5. See response to Common Comment P.

North America. Montana is dependent on tourism and recreation for more than a third of its economy, and as climate change leads to the loss of glaciers, trout die-off, and the loss of other species, our economy will suffer.

6 { **4. Consider all economic costs and benefits.** The \$70 million benefits of this project are pocket change. Don't insult Montanans by claiming the economic benefits of the project are substantial and much-needed improvements. Relatively few jobs will be created by this project, there is *no guarantee that Montanans will be employed*, and the jobs are short term only. Meanwhile, recreation, tourism, and other related businesses that utilize these corridors such as outfitters and rafters will suffer significant impacts from delays on roadways, the visual impact of the tar sands trucks, and the awareness from tourists that this is a tar sands related high and wide corridor. \$70 million is pocket change compared to the \$1 billion plus generated in tourism and recreation each year in Montana. What's more, the EA *FAILS to consider the significant impacts of the trailers which will be returning DURING THE DAY.*

7 { **There is absolutely no need for this project in Montana.** What Imperial Oil/ExxonMobil would have you believe, is that the tar sands would come to a screeching halt if this project were stopped. The fact is, A ROUTE ALREADY EXISTS, and this project is simply a way for the wealthiest corporations in the world to walk all over Montana, while hardly sharing ANY benefits with the state. Several jobs are created short term, with no guarantee that Montanans are employed, and meanwhile, WE SUFFER ALL OF THE CONSEQUENCES. Blue Ribbon trout streams like the Blackfoot and the character of Western Montana will be damaged permanently. *MDT has failed to prove why and how we possibly need 50 new turnouts for the public good.* Could it really be that travelers in Montana need 50 new opportunities to make phone calls on the side of the road? *Give me a break.*

8 { **The only people fooled by this project are those who wrote the Kearnl Module Transportation project EA and who are now evaluating it at MDT.**  
The rest of Montana knows what we're getting into. Why else, then, would public sentiment be overwhelming in opposition to the trucks?

9 { Director Jim Lynch claimed, one year ago, that such a proposed high and wide corridor represented significant impacts to Western Montana – what's changed since he made those comments? What behind the scenes bargaining has gone on between oil executives and the State of Montana.

6. See responses to Common Comments Q, M, G and J. Additionally, the returning trailers will not hinder the flow of traffic as Imperial Oil has decided to breakdown the trailers before hauling through Montana so they will no longer be oversized (see Corrections and Clarifications, Section 4.0 of the Decision Document).

7. See responses to Common Comments D1, D2, and O.

8. Comment noted.

9. Director Lynch made his comments based on information provided to MDT by Imperial Oil at the time. Since then, Imperial Oil has clarified the proposed action and MDT asked Imperial Oil to commit to specific activities in their project. Also, MDT has made this decision in accordance with Montana law, including the MEPA.

- |    |   |  |
|----|---|--|
| 10 | <p>I am a “big D” Democrat and I have the utmost faith in our governing agencies, like MDT, to manage our state in the best interest of the public. However, my faith has been tarnished by the recent performance of MDT. Please restore my confidence in the public process and the effectiveness of agency analysis by performing a full EIS and extending the comment period.</p> <p>If we have nothing to fear in an EIS, as many would have us believe, then let’s conduct one and be sure that we’re doing right by Montana. <i>Anything less would be arbitrary and capricious.</i></p> <p><b>Please also see the comments below for more details of my concerns:</b></p> | <p>10. See response to Common Comment B and F1.</p>  |
| 11 | <p>1. DOT regulations require the identification of logical termini for a proposed action. The justification for this appears to be political boundaries, which is an insufficient justification for logical termini. The logical termini needs to be clearly defined.</p>  | <p>11. Montana law, including MEPA, only applies within Montana. See response to Common Comment E1 and Common Comment E2.</p>  |
| 12 | <p>2. While some reasonably foreseeable future actions have been defined, those appear to be confined to future MDT actions. Reasonably foreseeable future actions need to include ALL actions regardless of what agency undertakes them. The timeframe used for the cumulative impact analysis is undefined as is the study area. For these reasons, the cumulative impact analysis done is insufficient to reach a conclusion that significant impacts will not occur.</p>  | <p>12. See response to Common Comment S. Those activities are described in Section 3.2.of the EA.</p>  |
| 13 | <p>3. A cumulative impact analysis also requires that both direct and indirect impacts of the proposed action be disclosed. Since it is clear that Tar Sands energy development could not continue but for completion of this proposed action, that energy development must be considered as an indirect effect of the proposed action. For this reason as well, the indirect and cumulative impacts analysis for this project is insufficient to reach a conclusion that significant impacts will not occur.</p>   | <p>13. See response to Common Comment E1.</p>  |
| 14 | <p>4. The historic property analysis does not discuss whether or not the SHPO or the THPO concurred with the Determination of Effects. Without this information, there is insufficient information to determine whether or not the proper process was followed in compliance with the National Historic Preservation Act or in compliance with Section 4(f) of the DOT Act.</p>   | <p>14. MDT consulted with SHPO under the Montana State Antiquities Act to identify where ground disturbing activity was located near a historical or archaeological site. The Blackfeet THPO also was consulted and asked for cultural monitors.</p> |
| 15 | <p>5. There is minimal disucsion of the effects of tree trimming on historic properties through the Town of Chotean and adjacent to Bonner Dam and Mine. The analysis needs to address the criteria that resulted in the significance of these properties for inclusion on the National Register. Tree trimming may effect the setting of historic properties. This has not been defined</p>  | <p>15. Both SHPO and THPO received a copy of the EA. The NHPA and Section 4(f) are not applicable to the proposed state action.</p>  |

16 { 6. The parks, recreation areas and wildlife refuge section is insufficient to determine whether or not a Section 4(f) use will occur. Utility relocations do not address all potential Section 4(f) properties. This section has insufficient information to determine whether or not any future planned parks or trails would be affected. The minimal information provided about potential effects to access and parking in the vicinity of Section 4(f) properties. There is no discussion of consultation with Officials with Jurisdiction regarding existing or future Section 4(f) properties, and in fact, compliance with Section 4(f) is not even mentioned. Overall, this discussion is insufficient to determine whether or not a Section 4(f) use will occur.

17 { 7. Compliance with the Environmental Justice Executive Order is not even mentioned. There are likely to be effects to minority and low income communities due to noise (especially since transportation of the modules will occur at night), air pollution, the possibility of spills and other negative effects.

18 { 8. The assessment in the document of potential effects to wetlands does not meet the requirements of the Clean Water Act nor the requirements of the Executive or DOT Order for Protection of Wetlands. There is no functional assessment of wetlands that has been done. Broad statements are made that "the location will be adjusted or mitigation applied to avoid impacts to wetlands" or that "two of the six locations appear to have wetland characteristics and need to be reviewed." Both of these statements indicate that wetland impacts are likely to occur and yet there is a concluding statement that "the proposed project is not expected to affect water resources including wetlands." This assessment is completely insufficient and does not meet the requirements of the FHWA Technical Advisory, the Protection of Wetlands Executive Order nor the Clean Water Act. Full survey and delineation of wetlands, including functional assessment needs to be completed. Then both direct and indirect impacts to wetlands needs to be done. Practicable alternatives to the impacts to wetlands needs to be prepared and documented and mitigation needs to be fully defined and committed to.

In summary, this EA is insufficient to determine the direct, indirect and cumulative impacts of the proposed action. It is insufficient to determine whether or not significant impacts will occur.

Thanks again for your time and consideration,

Zack Porter

16. See response to Specific Comment C.

17. Section 4(f) does not apply as this is not a federal action.

18. Environmental Justice is not a MEPA issue. Executive Order 12898 is a presidential executive order that requires 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 populations and low-income populations. Because MDT is a state rather than federal agency, it is not required to comply with EO12898. That said, MDT does not expect this project to have any disproportionately high and adverse effects on minority populations and low-income populations. Please see the EA and Decision Document for additional impacts discussion. Environmental Justice is not a MEPA issue.

The proposed project is expected to comply with the Clean Water Act. Executive Order 11990 is a presidential executive order that requires federal agencies to protect wetlands. Because MDT is a state rather than federal agency, this executive order is not mentioned in the Environmental Assessment. That said, MDT does not expect this project to adversely impact wetlands. Please see the response to Common Comment J, the EA and the Decision Document for additional impacts discussion. See the response to Common Comment I.

<p>1 { I myself think that we should allow them here, they have paid lots of money to transport them and has brought in lots of money, and as a trucker myself, I don't believe all this environmental bull shit, it's not going to hurt the highways or the environment, these so-called environments have nothing better to do than sue, so let's welcome the big rigs Dwight Povsha, po box 324, Florence mt. 59833,,,,,, 273-0329</p>	<p><b>POVSHA, DWIGHT</b></p> <p>1. Comment noted.</p>
<p>Dear MDT:</p> <p>1 { I hope you will not send those giant trucks through Montana to transport equipment for an industrial technology that is outdated and that is taking such a great toll on our earth's integrity and health. Okay, so the state will receive lots of money as a result, but what will the long-range effects of petroleum and coal technology be on our health and quality of life?</p> <p>I would much rather see precious resources going toward development of clean power. Sincerely, Sandra Rachlis</p>	<p><b>RACHLIS, SANDRA</b></p> <p>1. Comment noted.</p>
<p>Dear Mr. Kailey,</p> <p>1 { I was shocked to learn that the comment period for this project was ending after only 30 days and I did not hear about this until today, the last day. Please, please extend the comment period for further public input on this important change in the Montana landscape.</p> <p>2 { With the current oil spill in the Gulf of Mexico, sympathy for oil companies is at an all-time low and this is just another example of how BIG oil does whatever the hell they want to and the hell with the rest of us. Since Exxon Mobile is the major stockholder in Imperial Oil, it is probably fruitless for the public to complain about this asinine plan of theirs to transport god knows what over and through some VERY sensitive watersheds and pristine environmental areas. Was the company that did the EA partnered with Imperial Oil? How can they say that all of this work and transport will HAVE NO IMPACT. What about the people who live along those routes? I am sure they will notice an impact. All they stressed was the money that would be spent on the project. Are we selling out so easily? If they are spending that much money, are they going to stop using the route after one year? I doubt it.</p> <p>3 { I could go on and on, but I guess you know where I am going with this. Please DO NOT let big oil win this round or we will all lose BIG TIME!! If the decision for this has already been made by the Montana government hierarchy, then so be it. I just want to say, though, that the PUBLIC does matter and if you don't listen to us when we speak out against ideas/projects that we see as detrimental to our state and way of life, then don't be surprised when election day rolls</p>	<p><b>REMPP, BARBARA</b></p> <p>1. See response to Common Comment F1.</p> <p>2. Comment noted.</p> <p>3. Comment noted.</p>

around and your decisions will have to made on a more personal level.

Sincerely,  
Barbara Rempp

Barbara Rempp  
Office Manager  
Montana Office  
2120 S. Reserve, PMB #126  
Missoula, MT 59801  
Phone: (406)745-5119  
Fax: (406)745-5130  
[barbara@drawa.org](mailto:barbara@drawa.org)

May 14, 2010  
Tom Martin  
Montana Department of Transportation  
P.O. Box 201001  
Helena, MT 59620-1001

Re: Kearl Module Transportation Project Environmental Assessment (KMTP EA)

Dear Mr. Martin:

1 { Thank you for the opportunity to comment on short notice. I echo the entire comments made by State Representative Betsy Hands, House District 99, Missoula, and the comments made by Barbara C. Hall, Legal Director, Clark Fork Coalition. Both Hands and Hall address the state and federal shortcomings of the Kearl Module Transportation Project Environmental Assessment (KMTP EA) prepared by Tetra Tech. I urge the Montana Department of Transportation (MDT) to extend the public comment period on the KMTP EA. My constituents expressed frustration with the short comment period for such a massive project with major long-term consequences. Since this proposal opens the floodgates for a high and wide corridor for decades to come, please allow more time for public comment.

2 { Please consider preparing an Environmental Impact Statement because the KMTP EA contains inadequate analysis of impacts to the environment (including fish and wildlife), local economies, scenic river and travel corridors, Montana's tourism industry, and to the safety of travel on Montana's roadways. Montana Department of Transportation has the legal authority to expand the scope of its MEPA analysis and conduct an EIS under its existing administrative rules, Montana Code Annotated, and the Montana Constitution, Article II, Section 3 (the right to a clean and healthful environment). Further, since federal actions are involved, NEPA should be complied with.

**REPRESENTATIVE HOUSE DISTRICT 97,  
MICHELE REINHART**

1. See response to Common Comment F1. Responses to the referenced comments are included in Appendix D.
2. See responses to Common Comments A, B and R.



<p>3 { The KMTP EA frequently minimizes risks and impacts as non-existent or “slight” without citing data to draw such conclusions. The KMTP EA is a part of a legally questionable piece-meal permitting process that fails to coordinate with other state and federal agencies regarding the scope, actions, and impacts of this project across the Pacific and Rocky Mountain West. After briefly looking over the KMTP EA, I have the following questions, so far. Please address these questions and provide supplemental information.</p>	<p>3. See Section 4.0 of the EA and the Decision Document regarding consultation.</p>
<p>4 { 1. What is the proposed economic benefit (cost savings) to Imperial Oil of this new proposed route in comparison to the traditional route from the Port of Houston, Texas to Alberta, Canada via Billings, Montana? Why did the KMTP EA ignore the existing route?</p>	<p>4. See response to Common Comment D1.</p>
<p>5 { 2. What is the total projected cost to Montana’s transportation infrastructure for one year because of the proposed modifications? What is this cost in comparison to costs of the traditional route? What are the proposed long-term costs to Montana’s transportation infrastructure of the traditional route compared to the proposed route? Please calculate cost comparisons from the present time until the 2060, or when high and wide trucks would cease using the corridor.</p>	<p>5. See response to Common Comment L.</p>
<p>6 { 3. Please specify how many miles of river corridors in Montana the current traditional route impacts. How many streams and rivers will the proposed route affect in Montana? How is MDT measuring and quantifying impacts to water quality and based on what data?</p>	<p>6. See response to Common Comments I and O. MDT does not anticipate significant impacts to rivers or streams (see Section 3.9 of the EA).</p>
<p>7 { 4. Did Imperial Oil investigate ways to transport equipment within existing legal length, width, height, and load limits? Did Imperial Oil consider assembling modules in Montana (with Montana workers) or in Alberta, instead of being assembled in Korea and transported on vehicles exceeding 200 feet in length? Why must Montana accommodate Imperial Oil’s desire to use public roadways for private benefit?</p>	<p>7. See response to Common Comment D3.</p>
<p>8 { 5. What are Imperial Oil’s proposed accident and spill prevention plans? Does MDT have any say over these plans and the adequacy of these plans? How did the KMTP EA determine that the risk of a spill was slight? Please explain the accident and spill response plans. Please estimate the potential costs of a spill or an accident along the proposed route.</p>	<p>8. See responses to Common Comments H1, H2, and H3.</p>
<p>9 { 6. I found no mention of icy winter roads in the KMTP EA. Please consider the impacts of these massive trucks on icy winter roads and the probability of rollovers and accidents between high and wide vehicles with regular sized cars and trucks. Please consider and estimate traffic fatalities. The KMPT EA does not adequately acknowledge traffic accident data on Montana’s roadways. Please address current traffic accident information on each section of roadway, in both urban and rural areas, but particularly in urban areas.</p>	<p>9. The modules would not be transported during inclement weather. Also, see response to Common Comment H1 and H2.</p>
<p>10 { 7. I found no mention of the potential road kill in the EA. Since travel will occur primarily at night, please estimate wildlife fatalities. How did the EA determine that impacts to wildlife would be slight? What wildlife data did the EA use? The proposed route is through known wildlife corridors.</p>	<p>10. See response to Common Comment I.</p>

11 { 8. Section 2.2.1.2, Financial Responsibility, (KMTP EA, page 6) said MDT is already negotiating the costs and responsibilities for road modifications with Imperial Oil. How is MDT calculating and determining Imperial Oil's costs and responsibilities for road modifications? Why is MDT negotiating costs and responsibilities at this time?  
Has MDT already made internal decisions to approve the project? Please consider postponing negotiations until after MDP completes the NEPA/MEPA process.

12 { Again, please consider extending the comment period, expanding the scope of the KMTP EA, and drafting an Environmental Impact Statement that fully addresses the costs of the proposed route to Montanans in comparison to the cost of the traditional existing route for the full time period that the proposed corridor could be in use.

Thank you in advance for addressing concerns regarding this project and its long term implications for Montana.

Sincerely,

Michele K. Reinhart  
State Representative, House District 97

May 12, 2010  
Director Jim Lynch  
Montana Department of Transportation  
2701 Prospect Avenue  
Helena, MT 59620

Re: Public comment for Kearl Module Transportation Project, EA

Dear Director Lynch:

1 { Thank you for meeting with the Missoula delegation on Monday to talk about the Kearl Module Transportation Project. Missoulians are concerned about safety, our rivers and streams, the impacts on tourism and on our roads and the possibility of making this a permanent high-wide corridor which will inextricably change our economy and quality of life in Missoula. Because of these potential impacts, we believe the department of Transportation should have found through the Montana Environmental Policy Act environmental assessment that a full Environmental Impact Statement and extension to the public comment period was necessary..

11. See responses to Common Comment L.

12. See response to Common Comment F1.

**REPRESENTATIVE HOUSE DISTRICT 98,  
SUE MALEK**

1. See response to Common Comments G, I, O, M, L, K, and B.

<p>2 { A 30-day comment period for a project of this magnitude is not acceptable. The Kearl Oil Sands Project is expected to be active through 2060; If the Lolo Pass to Canada route becomes an Industrial High/Wide Haul Corridor, it could be used for many years to come. An extended time period would allow people living near the corridor to consider and comment on whether Kearl has sufficiently answered questions about significant impacts on environmental quality, access to recreational and wilderness activities; human health; quantity and distribution of employment; demands for government services; and locally adopted environmental plans and goals in the short and long terms. If this review is confined just to Missoula, access from the Bitterroot Valley and from the Seely/Swan and Blackfoot Valleys are extremely vulnerable. This impact requires consideration and any plan must address how these impacts would be mitigated.</p> <p>3 { If MDT agrees there are significant concerns affecting the quality of the human environment, MDT is required to prepare an EIS from the start. According to MEPA ARM 18.2.237 GENERAL REQUIREMENTS OF THE ENVIRONMENTAL REVIEW PROCESS</p> <p>(1) The agency shall prepare an EIS as follows:          (a) whenever an EA indicates that an EIS is necessary; or          (b) whenever, based on the criteria in ARM 18.2.238, the proposed action is a major action of state government significantly affecting the quality of the human environment.</p> <p>I believe an EIS should be required because of the long and short term impacts on Missoula, Seeley Lake, Lolo and Lolo Pass and the associated streams, rivers, agricultural, commercial, and recreational activities essential to these areas.</p> <p>Respectfully,          Representative Sue Malek          House District 98</p>	<p>2. See response to Common Comment F1.</p> <p>3. See response to Common Comment B.</p>
<p>1 { The long-term implications of this project on Montana highways and on the Montana environment call for a much more thorough study and analysis than an EA. There is much more to this decision than approval of a one-year project. The decision should be to turn down the project at this time, pending a much more thorough analysis and public discussion.</p>	<p><b>RETTEYMAYER, JOHN</b></p> <p>1. See response to Common Comment B.</p>

John Rettenmayer  
 3414B Connery Way  
 Missoula MT 59808  
 406-531-2142

From: Rebecca Richards, Missoula ([BeckyTRichards@gmail.com](mailto:BeckyTRichards@gmail.com); 104 Michelle Court, Missoula, MT 59803)

tel: (406) 721-6107

Based on my reading of the EA, my main objections to the KMTP are as follows:

- 1 { a) Too little consideration has been given to the wilderness values of the Hwy 12 Lochsa Corridor as a Wild and Scenic River byway by dismissing the risks posed to wildlife, water quality, and general ecosystem integrity. By "too little consideration" I explicitly mean allowing the Keale transportation rigs through the Lochsa as opening the corridor to future "big rigs" embarking at Lewiston. The EA does NOT address the frequency of truck accidents in the corridor nor the weather and avalanche closures that often make the highway impassable much less the inappropriate use of designating the Lochsa corridor as a BOTH a Wild and Scenic River and a major long haul, big rig overland route. This incompatibility extends over the state line to Montana at Lolo Pass and down Lolo Creek to Traveler's Rest. Historically, this part of the Lewis and Clark Trail is incompatible with big rig, long haul transport. And I vividly remember the "microburst" that flatten two hillsides with wild gusts over 100 mph about ten years ago-- what would such events do to a Keale transport truck? The two-lane Hwy 12 is far too narrow now by the creek and traffic is often backed up behind a "normal" semi-truck. Numerous truck spills have occurred on the highway and one year, and wildlife roadkills are numerous.
- 2 {
- 3 { b) Too little consideration has been given to the historical importance of the Hwy 12 corridor as both the tribal buffalo trail and Lewis and Clark exploration route; opening this corridor to big-rig, long haul transport is incompatible with the values residents and visitors attach to the region historically;
- 4 { c) Far too little consideration of the Alternatives Considered but Eliminated (2.3) was given by the consultants; the Keale project would open the route from the Columbia/Snake to Lewiston overland to the interior. In the long-term, modifying the "25 existing overpasses" to allow night time big rig, long-haul transport makes far more sense than moving them up the treacherous and wild Lochsa and over Lolo Pass. In addition, NO consideration was given to considering the proposed route versus the alternative routes to accident mitigation and the availability of fire, police, and other

**RICHARDS, REBECCA**

- 1. See response to Common Comment E2.
- 2. See responses to Common Comments H1 and H2.
- 3. See responses to Common Comments K and N.
- 4. See responses to Common Comments D1 and D2.

4 { personnel. Moreover, the U.S. states south of Vancouver should not have to bear the externalities of the height restrictions that B.C. has placed on its highways so cavalierly dismissed as "infeasible" in the EA. Let B.C. and Alberta work out transCanadian transportation restrictions and NOT allow Montana to absorb the inevitable highway repair, accident response and cleanup, traffic nuisance and delays, wildlife losses, water quality risks, and all the other impacts inevitably resulting from this project.

5 { d) Finally, this project will both short-term and long-term negatively impact the tourism industry along the Hwy 12 corridor and numerous small communities connected to it. Socioeconomically, it makes no sense to allow the Hwy 12 corridor to be used in this project-- there are NO positive benefits given the problems it poses for traffic snarls, wildlife impacts and water quality risks due to road accidents, long-term road damage, short- to long-term road closures, and general complete incompatibility with the wilderness area that surrounds the Lochsa and national forests around Lolo. I have driven numerous times to Boise and to southern Oregon, in all seasons of the years, and the risk of being stranded somewhere up the highway with a Keale transport rig overturned and no idea of when or how it would be removed is sobering.

There are certainly other routes for this equipment but up the Clearwater/Lochsa on to Lolo and the Bitterroot Valley is NOT one of them.

6 { I haven't even begun to think about the problems from Lolo on to the Blackfoot-- I could add all those but the proposed route from Lewiston over Lolo is so compellingly "NO" that I have my focused my comments on this stretch. Should the project be re-routed from Lewiston over the Interstates to Missoula and THEN up the Blackfoot through Lincoln, I would have numerous, and similar, objections as well. But my most compelling objection in the present proposal is the route up the Lochsa over Lolo.

I appreciate MDOT's efforts to allow public comment and I urge you to turn this proposal down as it now stands.

Sincerely,  
 Rebecca (Becky) Richards,  
 Missoula

See response above.

5. See responses to Common Comments M, H1, H2, and H3.

6. See response to Common Comment O.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Concerned,  
Miriam Richmond  
Missoula MT

**RICHMOND, MIRIAM**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comments A.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

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- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

**RISTAU, RANDI M.**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

1 { Do you work for the government or the oil companies, personally knowing hundreds of people who are passionate recreators of this area; if this gets approved I fear for the safety of those officials involved, and workers involved. Need not even mention the greater intrinsic value the area has crushes and value I'm resources.

**ROBERT, BOB**

1. Comment noted.

1 { Please do not use our beautiful Montana to transport these huge destructive pieces of equipment! This is our city, our land, not Canada's to use as they wish! Find a different route!

**ROBISON, SHANNA**

1. Comment noted.

**Shanna M. Robison** | Administrative Assistant

Historical Research Associates, Inc.  
 125 Bank Street | Suite 500 | Missoula, MT 59802  
 406.721.1958 ext. 200 | fax 406.721.1964 | cell 406.370.1704  
[srobison@hrassoc.com](mailto:srobison@hrassoc.com) | [www.hrassoc.com](http://www.hrassoc.com)

Tom Martin  
 MDOT

**ROCKY MOUNTAIN CONTRACTORS,  
 RANDY WILLIAMS**

Dear Mr. Martin:

1 { I'm writing this email in support of the Kearsley Module Transport Project. My belief is that this project has been extensively studied and MDOT should proceed to write the oversize permits. Rocky Mountain Contractors has been on standby for a couple of months to perform many utility moves to accommodate this project. We have over 10,000 ft of directional drilling to complete for about a 1/3 of the project. This will employ several MT workers and we will have to buy at least one additional directional drilling machine from a MT vendor valued at about \$250,00.00. We have also been told we will need to employ 4 to 5 overhead power and telephone crews to move the overhead lines in this section of the project. These crews are normally 4 man crews and are well paid union employees. There are other contractors along the route that will be doing similar utility moves.

1. Comment noted.

2 { In closing, I believe that the Kearsley Module Transport Project will have little detrimental effect on the highway system and a huge beneficial effect on the economy of Montana. Please grant the oversize permits in a timely manner.

2. Comment noted.

Sincerely,  
**Randy Williams**  
 President

**Rocky Mountain Contractors, Inc.**  
**3268 Ocean View Drive**  
**Helena, MT 59602**

**406-442-8761 x 101 voice**  
**406-442-8762 fax**  
**406-439-9570 cell**

Sir:

1 { Kearl Module Transport Project (KMTP) scares me to death. Do a full EIS. This project seems full of hidden and unintended environmental and economic consequences. I would be amazed if this proposal doesn't run into a buzzsaw similar to the one encountered by Phelps Dodge and Canyon Resources when they proposed the McDonald Gold Project.

Paul S. Roos  
 paul@paulroos.com  
 Lincoln, MT

**ROOS, PAUL**

1. See the response to Common Comment B.

Dear Mr. Martin,

1 { It is entirely irresponsible for the State of Montana to allow this project to move forward, and to do so without a completely thorough environmental impact assessment is a statement of the corruption that must exist in your office. It is your duty to order a complete assessment prior to allowing this project to move forward. I guarantee you irresponsible actions will not go unnoticed nor unacted upon.

Sincerely,  
 Faith Rose  
 Bozeman, MT

**ROSE, FAITH**

1. See the response to Common Comment B.

1 { The wild and scenic Lochsa is a beautiful winding narrow, mountain road, in keeping with the magnificent river it follows along. We do not want to destroy the harmony of road, river and mountain that exists now. It should not be widened into a super highway and obstructed by these huge rigs -- and especially not to facilitate the polluting tar sands process.

Barbara Ross  
 215 Florence St.  
 Missoula, MT 59801

**ROSS, BARBARA**

1. Comment noted.



TO: Mr. Tom Martin  
FROM: Amy S. Rubin (Missoula, Montana)

RE: Tar Sands (Imperial Oil proposal to transport large equipment across MT).

Dear Mr. Martin,  
Please deny approval for this project.

1 { Not only is the transport of this equipment a very bad idea, as it will have a tremendous impact on MT travel, but the actual mining of coal from "tar sands" is incredibly damaging to the environment, and also very dirty coal to burn causing more problems.

2 { If Alberta wants to permit this mining to happen, that is a decision we do not have control over. However we should not facilitate it happening to our own detriment. Billions will be spent under this plan constructing turn-outs along the Montana route for passing on the highways. That money could be better spent on green energy development.

3 { The equipment is being assembled overseas and then shipped. They could ship it and transport it to the site and assemble it there without needing to use Montana highways for transport at all.

4 { In addition, tourism in MT will be significantly impacted, as what tourist in his or her right mind would even want to consider traveling to MT and getting hung up behind one of these transports.

Lets not facilitate this awful idea from progressing into reality.

Thank you.  
AR

**RUBIN, AMY**

1. No coal is removed from the oil sands.
2. As stated in the EA (see Section 3.6) the cost of the turnout construction is estimated to be \$7.1 million paid for by Imperial Oil.
3. See response to Common Comment D1.
4. See responses to Common Comments M and G.

Voicemail comment received by me today from Olivia Riutta.....

1 { I am calling to express my concern and desire to extend the deadline on the conversation about the big rigs coming through. My community, it's something that our community council is opposing and has tried to set up a meeting with Imperial Oil and there simply even isn't enough time to have questions answered.

Olivia Riutta  
Bonner , Montana

**RUITTA, OLIVIA**

1. See response to Common Comment F1.

Martin,

1 { I am opposed to modifying our roads to accommodate this project. The reason is that this is for a one time project and any problems that all the modifications might cause in a few years will most likely not be addressed by Exxon Mobile.

2 { I am no scientist but common sense and observations of what has gone on in the past and is currently going on with oil companies doing damage to resources we all share like water and land is evidence enough that we should say no.

{ It is high time we stop developing oil at any cost and concentrate on more sensibly harvested and environmentally friendly resources like natural gas.

3 { Please do not cave in to the promise of money and jobs at the expense of our environment. In the long run it is too steep a price for Montana.

Candace Rutledge  
Lincoln, Montana

**RUTLEDGE, CANDACE**

1. See response to Common Comment L.
2. Comment noted.
3. Comment noted.

I am writing to express my disappointment with the MDOT regarding the Kearn modules traveling through Montana.

1 { The EA does not address bridge capacity nor the maintenance and repairs that WE the taxpayers will be paying for in the future. Is the Buckhous bridge able to carry this weight, no matter how many axles there may be?

2 { What happens when traffic IS backed up for over 10 minutes? What happens when one of these trucks rolls over and lands in a river? Will we expect the same lack of responsibility as we are seeing now with the Gulf of Mexico spill?

The thought that this will create very many jobs in Montana is ludicrous.

3 { The jobs will be short term and that's it. This will be a permanent corridor. We (Montana) are going to let Exxon RUIN Hwy. 12 and Hwy. 200, the Lolo/Lochsa river corridor AND the Blackfoot corridor with 300 foot turn outs every few miles? For what? For a few short term jobs? This is ridiculous. These river corridors are extremely valuable, beautiful and scenic and we are willing to let an oil company ruin this? We are ruining some of the best river and mountain corridors in the state by approving these giant trucks. I can't believe I ever voted for Brian Schweitzer.

4 { I cannot believe we are essentially acting as though this is feudal England, except the king that apparently owns the land that we serfs have to pay is a giant corporation.

Stacy Rye  
Missoula, MT

**RYE, STACY**

1. See response to Common Comment L. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs.
2. See response to Common Comment H2. The ARM provides for confiscation of permits and/or administrative penalties at 18.8.901 and 18.8.902.
3. See the response to Common Comment O.
4. Comment noted.

Name: Rob Saldin  
 Address Line 1: 237 Kensington  
 City: Missoula  
 State/Province: MT  
 Postal Code: 59801  
 Email Address: robert.saldin@umontana.edu  
 Phone Number: 406 243-4418  
 Comment Subject: high and wide industrial corridor

Dear Montana Dept. of Transportation,

1 { I'm concerned about the creation of a permanent industrial corridor along some of Montana's scenic highways and river ways. Please conduct a review for the establishment of this permanent industrial corridor, require real alternatives, and provide an economic analysis that weighs the impacts to recreation and tourism.

To Those Concerned:

I have studied the material about the project online at MDOT and attended the public presentation in Missoula.

I object to the issuance of the permits because:

1 { 1. The 32J permit in itself is insufficient to cover multiple loads. A single load requires a fee and insurance, but the cumulative and long-term effects of 200 loads isn't covered by this 8 page form. The \$1million single load insurance coverage, even multiplied 200 times, would be inadequate for this special circumstance.

2 { 2. The EIS review would be necessary if Federal dollars are in question. Although new Federal dollars aren't in question, the excessive use of invested Federal dollars is in question. If it is an unresolved question whether this infrastructure will be subjected to undue stresses through repeated maximal loads, then the more thoroughgoing analysis of the EIS would appear to be necessary.

3 { 3. The EA offered by the applicant is inadequate on the surface when it lists under economic impacts only positive impacts. No negative impacts are analyzed. The year-round tourist and recreation economy of this area, and especially the Hwy 12 and 200 routes, will be adversely affected by visitors who will choose to avoid inconvenience and additional recreation expense. Has this oversight been inadvertant? With the thoroughness of the rest of the plan, one would guess not.

4 { For these specific objections confined to the subjects limited by the process, I strongly object to the issuance of these permits. However, these points pale when compared to the mammoth economic defection and betrayal implemented by this process.

**SALDIN, ROBERT**

1. See the responses to Common Comment K, D!, D2, D3, and M.

**SALMONSON, JON**

1. A separate 32J permit will be issued to each module transport load. As stated in the EA (page 34), the total fees for the 200 loads is estimated at \$1.0 million. This amount has been revised to \$0.9 million due to return trailers not needing oversized load permits. See Section 4.4 of the Decision Document.
2. See response to Common Comment B. MDT has established the maximum transport vehicles axle loadings to comply with road and bridge designs.
3. See response to Common Comment M.
4. Comment noted.

Thank you,  
 Jon Salmonson  
 1919 South 8th Street West  
 Missoula, Montana 59801

Please protect the Lochsa River from further degradation by denying Imperial Oil/ExxonMobil permission to move their oversized equipment through this corridor. The Lochsa is a special place that must be preserved. It is also a dangerous mountain road that is not appropriate for these big rigs. Their presence would make the road even more treacherous. There have already been several wrecks on Highway 12, endangering the fragile health of the river and the safety of those who travel it.

Jennifer Sauer  
 Missoula, Montana  
[jenabear54@gmail.com](mailto:jenabear54@gmail.com)

SAVE OUR WILD SALMON COALITION  
 NATURAL RESOURCES DEFENSE COUNCIL  
 IDAHO RIVERS UNITED

May 13, 2010  
 Dwane Kailey, P.E.  
 Chief Engineer  
 Montana Department of Transportation  
 2701 Prospect Avenue  
 PO Box 201001  
 Helena, MT 59620-1001  
[mdtcommentskearl@mt.gov](mailto:mdtcommentskearl@mt.gov)

Dear Mr. Kailey,

Please accept these comments from the Save Our *wild* Salmon Coalition on Imperial Oil/Exxon Mobil's application to Montana Department of Transportation for permits to transport oversize loads through western Montana for use in Alberta Tar Sands strip mining, and on the environmental assessment of the proposal prepared by MDT.

Save Our *wild* Salmon's member organizations represent some 6 million Americans, and many thousands of jobs in the Northwest states. Our mission is to restore abundant sustainable wild salmon and steelhead to Northwest rivers and streams for use by people and ecosystems. We focus particularly on the Columbia/Snake Basin, whose wild salmon are impacted by Exxon's proposed transportation. Many of our member organizations have memberships in Montana; our fishing members represent Montana fishermen who both travel to Idaho and points west for salmon and steelhead fishing each year, and enjoy resident fisheries in Montana that are affected

**SAUER, JENNIFER**

1. See responses to Common Comments E2, H1, and H2.

**SAVE OUR WILD SALMON COALITION,  
 PAT FORD; NATURAL RESOURCES  
 DEFENSE COUNCIL, BOBBY  
 MCENANEY; IDAHO RIVERS UNITED,  
 KEVIN LEWIS**

by downstream water management for salmon and steelhead.

The Natural Resources Defense Council (NRDC) is a national, nonprofit organization of scientists, lawyers and environmental specialists dedicated to protecting public health and the environment. Founded in 1970, NRDC has more than 1.2 million members and activists nationwide, with offices nationwide and abroad, including staff who work out of Livingston, Montana. Many of our members are also Montana residents who take great interest in conserving the natural splendor that makes Montana such an exceptional place.

Idaho Rivers United is a non-profit charitable membership organization. Our mission is to protect and restore the rivers of Idaho. We are Idaho’s only statewide river conservation group and currently have more than 3,400 members. Our membership includes residents of Montana who frequently utilize the proposed travel route to recreate on the Wild & Scenic Lochsa River and other Idaho rivers. Our members are a diverse group yet they all have a common link - a deep love for the rivers, lakes and streams of Idaho and the desire to protect these waterways.

1 { In brief, we urge the Montana Department of Transportation to (a) extend the comment period for this proposal, and (b) conduct a full environmental impact statement on its effects. We believe the latter is appropriate under Montana law, and necessary to provide the citizens of Montana, and affected neighbors, with a full picture of this proposal’s short and long-term effects. Only with that full picture can Montanans and others affected make sound decisions about this proposal.

Our detailed comments follow.

2 { **The public comment period should be extended.** The public comment period closes May 14, which we submit is too short given the scope of this project. Our members did not become aware of the project until news reports, including some focused on the MDT EA, were released over the last 20 days. The actions proposed in Montana are significant, and are connected to actions in other Northwest states and Canada that, taken together, constitute a major project with large effects on public resources and properties both interstate and intrastate. Interest among Montana citizens, and neighbors, is clearly high despite this very recent notice. We believe the public’s right to a reasonable opportunity to participate in MDT action, which includes a reasonable opportunity to review the issues and materials, is at risk with the current comment deadline of May 14, 2010. We therefore request an extension of at least 60 days.

3 { **An environmental impact statement should be prepared for this project.** We believe the scope of the EA is too limited given the scope of the project. Important issues about the project are not considered, or insufficiently considered, in the EA. An EIS is in keeping with requirements of Montana law and the level of public interest in the project.

1. See responses to Common Comments F1 and B.

2. See response to Common Comment F1.

3. See response to Common Comment B.

4 { In particular, the EA restricts itself to examination of Exxon’s year-long proposed use of the Montana corridor, when what is clearly occurring here is development of a permanent High-and-Wide corridor through Montana. The EA itself acknowledges, “MDT believes it is reasonably foreseeable that additional oversized loads would want to use the route.” We believe it is unmistakable that a permanent corridor will result. MDT Director Jim Lynch agreed in a July 2009 briefing to the Montana Legislature, in which he stated that Exxon proposes “to create permanent High/Wide Corridors through Montana”, and that this project will be “setting the stage for a high/wide corridor in Montana for things we haven’t imagined yet.”

5 { That Mr. Lynch is correct is borne out by connected actions outside Montana’s borders. For instance, the Port of Lewiston, Idaho, has applied for federal stimulus funds to expand its port facilities and a state highway to handle the Exxon traffic; its application notes that the project will “provid[e] an oversized transportation route for oil (Kearl oil sands)...” No mention of a temporary or short-term project is made in that application.

6 { MDT is not restricted to information submitted by the applicant in its determination of the scope, purpose and need, and consideration of environmental impacts of this project. Tar sands development in Canada is projected to continue for decades. Once established, a high/wide transportation route to that development is likely to be used for decades. MDT must consider the permanent effects upon Montana of this corridor – effects that Mr. Lynch characterized as of “significant impact to the state.” An EIS, not an EA, is the appropriate means for considering such effects.

7 { An EIS is also appropriate given that MDT did not involve the public in a formal scoping process for the environmental review done to date, nor required the applicant to submit a programmatic environmental review document. Exxon Mobil’s actions make plain the company sees this as a major project; we believe MDT should agree, and thus prepare an EIS to provide full opportunity for analysis of and public involvement in its many aspects and effects.

8 { We believe approval of Exxon’s proposal, without programmatic environmental review via an EIS, will lock in subsequent use and development of this corridor without lawful consideration of the cumulative environmental impacts of or reasonable alternatives to the project.

**The EA does not consider alternatives to the proposed action, as required by law.**

The EA’s consideration of alternatives is far too brief: a “no action” alternative is addressed in one paragraph, and four “Alternatives Considered but Eliminated“ are addressed in four paragraphs. These paragraphs note impassable barriers encountered along each of these routes, yet 9 pages of the EA detail the extensive construction needed to make the proposed route passable – since it is also impassable now.

4. See response to Common Comment K.

5. See the response to Common Comment E2.

6. See response to Common Comment K.

7. See response to Common Comment B.

8. See response to Common Comment C1.

9 { MDT is required to prepare a “description and analysis of reasonable alternatives to a proposed action whenever alternatives are reasonably available and prudent to consider and a discussion of how the alternative would be implemented.” MDT is constrained to consider alternatives that would “appreciably accomplish the same objectives or results as the proposed action,” or “for agency-initiated actions, a different program or series of activities that would accomplish other objectives or a different use of resources than the proposed program or series of activities,” and these alternatives must be “realistic and technologically available.” In essence, Exxon has proposed a scenario that by default disqualifies all other options. This is precisely why MDT must not take for granted the assumptions presented by Exxon. The EA’s few paragraphs on alternatives fail these requirements. It is thus impossible for Montana citizens, or MDT decision-makers, to adequately compare the proposal with any alternatives.

9. Comment noted.

10 { In addition, the most obvious and usable alternative is not considered in the EA – namely, use of the existing High/Wide corridor from the Port of Houston, Texas, through Billings to Alberta. MDT Director Lynch referred to this alternative in his July 2009 briefing above. It should be fully considered.

10. See response to Common Comment D1.

**The EA does not meaningfully consider the direct and cumulative environmental and economic impacts of this project.** The EA’s examination of environmental impacts of the proposal is limited to Exxon’s specific proposal to transport 200 modules through Montana. It does not consider the impacts of creating a permanent High/Wide corridor, as it should.

11 { The EA does not consider the environmental and economic impacts on Montanans of the project this action would specifically assist: Alberta Tar Sands strip mining. This is a failure to comply with the letter and spirit of MEPA. For example, tar sands development now contemplated will constitute 44% of the total increase in Canada’s greenhouse gas emissions projected by 2020. These emissions will have direct and negative effects upon Montana lands, glaciers, waters, fish and wildlife, people, private and public budgets, and agricultural, recreational and water-based economies.

11. See response to Common Comment P.

12 { MEPA requires examination of direct, secondary and cumulative impacts of a proposal. Cumulative impacts are defined as “the collective impacts on the human environment of the proposed action when considered in conjunction with other past, present, and future actions related to the proposed action by location or generic type.” The EA does not do this. The EA fails to consider the permanent effects of this permanent corridor on highways, bridges and other infrastructure; on the safety and convenience of Montanans using the same routes to conduct their lives and businesses; on land and water resources along the corridor; and the effects to be visited upon Montanans from the Canadian development Exxon seeks to accelerate.

12. See responses to Common Comments K and S.

**The project scope, geographic extent, and range of direct, secondary and cumulative environmental and economic impacts, when coupled with the inadequacy of MDT’s**

**scoping and programmatic review processes to date, require preparation of a federal joint environmental impact statement under NEPA.**

13 { This project crosses three state lines and two international boundaries. It relies on passage over a U.S. Highway and through a federally maintained navigation channel and related dams and locks. The permissions and involvement of many state and federal government agencies, multiple county and city governments, and the Nez Perce and Blackfeet nations are required. The route includes a number of registered National Historic Landmarks, a National Scenic Byway-All American route that traces the path of the Lewis and Clark Expedition, one of the first designated Wild and Scenic River systems, all the while transecting and abutting miles of critical habitat that has been designated by the U.S. Fish & Wildlife Service to protect threatened and endangered species in the region—primarily for anadromous fish. The impacts of this project, coupled with its purposes, spread across Montana, the western United States, and North America, and extend for decades into the future.

13. Comment noted.

14 { We believe MDT’s review to date, specifically in the EA, falls far short of what state and federal law and Montana public interests require, even if restricted solely to immediate project impacts within Montana’s borders. We also believe that Montana law requires consideration of project actions outside Montana’s borders that will have impact on Montana people and resources.

14. See response to Common Comment E1 and Common Comment E2.

15 { Finally, we believe that the National Environmental Policy Act requires review of this project and the wider actions of which it is part in a consolidated rather than piecemeal fashion. The piecemeal review of a too-narrowly defined project by MDT is largely a symptom of the larger problem: a similar failure by other states and the federal government to examine comprehensively this entire project (by which we mean the true, full project rather than the narrow and false definition of it provided by Exxon and so far accepted by MDT).

15. See response to Common Comment A.

16 { Our nation is now suffering the tragic but foreseeable consequences, in the Gulf of Mexico, of accepting the assurances of a major oil company, rather than fully and carefully evaluating its proposed project in advance, with focused attention on all aspects, and all possible environmental and economic costs as well as benefits. We therefore urge MDT to seek, and actively participate in, an un-segmented environmental analysis of the full project under NEPA. This course will comply with Montana’s Environmental Policy Act, as well as better assure that the full interests of Montanans in this project and its many tentacles are considered, evaluated, and judged as to the public interest.

16. See responses to Common Comments A and B.

Thank you for considering these comments.

Sincerely,

Pat Ford, executive director  
Save Our *wild* Salmon Coalition

Bobby McEnaney, Lands Staff Advocate  
Natural Resources Defense Council



200 First Avenue West, #201 Seattle WA 98119 208-345-9067 <a href="mailto:pford@wildidaho.org">pford@wildidaho.org</a> Kevin Lewis, conservation program director Idaho Rivers United Box 633 Boise ID 83701 208-343-7481 <a href="mailto:kevin@idahorivers.org">kevin@idahorivers.org</a>	1200 New York Ave., Suite 400 Washington D.C. 20005 202-289-2429 <a href="mailto:bmccenaney@nrdc.org">bmccenaney@nrdc.org</a>
---	--

Thank you for reading my comment.

1 { I have great concerns that the magnitude of the problems associated with permitting the use of taxpayer funded roadways in order to move tar sands mining equipment is equally proportional to the enormous size of the equipment. At minimum, a full environmental impact statement is a critical need.

2 { The impact on the state of Montana is half of my concern; the other half is that we would be supporting the Kearl oil sands project in northern Alberta, a project outside of Montana and US environmental regulation, and one that will clearly compound the accumulation of greenhouse gasses.

3 { Why would our state want to be associated with this dangerous project? Why would we want to put our state through severe disruption of travel between communities, affecting not only Montana citizens, but visitors to our state during the tourist season?

4 { What else might not be known yet about what it would take to safely move pieces of equipment as large as 24 feet wide, 30 feet high, and 150 feet long on two-lane Montana roadways?

I urge you to study and act with great caution.

Again, thank you for taking the time to consider my thoughts.

Julia M Saylor  
Helena, MT

To: Tom Martin & Montana Department of Transportation (MDT)  
Re: Kearl Module Transport Project Environmental Assessment (EA)

Dear Sirs and Madams,

1 { I am very distressed to hear that you are considering allowing these huge, over-sized loads to utilize our Montana highway system. I feel that the impacts to the state tourist industry will be enormous. Tourists do not want to see huge industrial strength equipment pulled over beside our incredible scenery. This will certainly discourage return visits and be a huge inconvenience to the local Montanans that need to use the roads 24/7.

**SAYLOR, JULIA**

1. See response to Common Comment B.
2. See response to Common Comment P.
3. See responses to Common Comments M, L and G.
4. Comment noted.

**SCARFF, JOAN**

1. See responses to Common Comments M, J, and G.

<p>2 { I also believe that most Montanans do not want our state to become a conduit for this huge equipment and that it will definitely impact our image. It also gives the impression that Montana, as a people, support the mining of the oil sands of Alberta when this is definitely not the case.</p> <p>3 { There are also all the environmental impacts to consider:          -impact to wildlife migratory routes          -huge increase in road kill          -dangers to the environment should a load rollover          -dangers to rivers and watersheds in expansion of pull-outs          -loss of scenery, trees, wildflowers along route</p> <p>4 { I do not feel that the Department of Transportation has seriously considered these issues and this project should not be rushed into without full consideration of all the impacts and potential risks and costs to Montanan taxpayers, now and into the future.</p> <p>Sincerely,          Joan Scarff          214 South Church Ave          Bozeman, Montana 59715</p>	<p>2. See response to Common Comment E1.</p> <p>3. See response to Common Comment I, H2, O, and J.</p> <p>4. Comment noted.</p>
<p>To: Tom Martin &amp; Montana Department of Transportation (MDT)          Re: Karl Module Transport Project Environmental Assessment (EA)          Dear Sirs:</p> <p>1 { I support the "No Action Alternative" described in the EA. The "Preferred Alternative" in the EA has been proposed due to a Canadian project that Canada seems unable or unwilling to accommodate by modifying their own infrastructure. Montana has no "need" for this project. I see no good reason why we should allow the deterioration of our existing roads and bridges to support this project. The supposed "loss of economic benefit" from the No Action Alternative is a pittance compared to the inconvenience our businesses, residents, and tourists will face if the permits are granted.</p> <p>2 { Should the MDT decide to ignore the No Action Alternative, then I suggest the EA is not thorough enough. A project of this magnitude calls for an Environmental Impact Statement instead. Here are some reasons:</p>	<p><b>SCARFF, STEVE</b></p> <p>1. Comment noted.</p> <p>2. See response to Common Comment B.</p>

3) 1) The EA offers no data on the current condition and weight limits of bridges on the proposed route. This information should be collected before any permits are issued. The bridges should be periodically inspected. It seems clear the "Preferred" Alternative would become a permanent corridor for oversize loads, further decreasing the lifespan of the bridges and roads on the route. Also, MDT should have plans in place to reroute normal traffic around each bridge on the route in the event of a structural collapse.

4) 2) Should the State of Montana believe that Imperial/Exxon-Mobil or other companies involved will willingly pay any claims for damages without dispute or lengthy litigation? Consider the history of oil companies, along with the fact that they can afford more and higher-paid attorneys than the State. The State would be wise to require a large bond to cover repair and remediation costs in the event of corporate failure to meet guarantees.

5) 3) This is not just a transportation project, and it would be extremely short-sighted to consider it as such. The EA totally ignores the fact that by allowing these permits, the State would be aiding and abetting the enormous volume of greenhouse gases (e.g.: CO2 and methane) produced by the Alberta Tar Sands project and its contribution to global climate change. The MDT must recognize its responsibility to consider such effects on Montana's natural environment. The overwhelming consensus among scientists is that greenhouse gases resulting from human activity are warming the earth and will eventually produce catastrophic results for life on earth.

6) Montana is not immune, and some of these effects are already noticeable here, such as the recent outbreak of pine bark beetles and resultant dead trees. A warmer earth will result in less moisture retention in our soils, and an increasing frequency of large forest fires. If current trends are not reversed, our forests will disappear, along with most of our wildlife and plant species. Montana will surely become a wasteland! It won't happen in our lifetimes, but is this the legacy we want for our descendants? By denying the permits, Montana can avoid contributing to ecological disaster.

Sincerely,

Steve Scarff  
 214 S Church Ave  
 Bozeman, MT 59715

3. See response to Common Comment L.

4. See response to Common Comment L.

5. See response to Common Comment P.

6. Comment noted.

To Whom It May Concern:

1 { The potential adverse impacts are significant. An immediate red flag goes out when the impact listed in the EA overview are all pre-determined as "minimal to no" environmental impacts. This should be challenged.

2 { To state that there is only "a slight risk of spill of contaminates or hazardous waste with minimal impacts" is questionable. A load this large over mountain passes and river corridors has a high risk of an accident.

3 { Our constitutional right (Article IX, Environment & Natural Resources), to a clean and healthful environment in Montana for present and future generations is being jeopardized.  
 There are other routes available. When Imperial/Exxon Mobile says this is the least expensive it is because they are not weighing the long term externalities. Montanans should not be subject to such potential loss when other alternative routes and energy technologies that are less dangerous are available.

I encourage the MDT to deny the permit altogether.

Sincerely,  
 Sam Schabacker

**SCHABACKER, SAM**

1. Comment noted.
2. See responses to Common Comments H1 and H2.
3. See response to Common Comment R, D1, and D2.

Hello:

I am concerned about the proposed transportation plan through Western Montana and up the front range for very large trucks and equipment.

My concerns include:

1 { 1. This process has not adequately included the public. Apparently a lot of background work was going on over the past months to years. Yet, the first public hearings were last week, and the public comment period (the only time to systematically collect public input) ends this week. This is far too little time for the public to have input on the public process and its effects on our public roads and rivers.. We need more time to be able to adequately weigh the concerns. I ask that the public comment period be extended to at least three months, and preferably six months.

**SCHENK, ELIZABETH**

1. See response to Common Comment F1. See the Consultation section in the EA (Section 4.0) and clarifications in Section 4.5 of this Decision Document.

2. I am concerned about the cumulative effects on our riverways.

2 { Lolo Creek and the Blackfoot are both primary headwaters of the Clark Fork River, and all support many people’s livelihoods as fishing guides, river guides, and as hosts of tourists. We have some of the best water left in the lower 48 and it is crucially important to protect it for the jobs it creates and sustains. I do not believe the EA process has been adequate to investigate potential risks to these rivers.

3 { 3. Similarly, the route along the front range is also a sensitive area. Wildlife populations are already fragile, and this impact needs to be better investigated (and the public educated) to determine negative impacts on grizzly and other populations.

4 { 4. The impacts on humans sound extreme. Traffic disruptions, noise, added pollution all are negative impacts. Missoula is the only town of size through which these vehicles will travel (at the slow speeds en route to Alberta). The route goes right through our busiest retail area, through one of the worst intersections in the state (Mullan and Reserve). Traffic happens all night there.

5 { Also, when a truck has a problem, it will tie up day time traffic for hours. We need to understand the financial impacts of this sort of disruption. Besides Missoula, there are many small towns affected, including degradation of environment, on which many people rely for livelihood and general well-being, increased stress from the annoyance of these loud and disruptive vehicles (as well as loss of real estate value for those near the route). The regular and repeated traffic of these vehicles will impact these communities in negative ways. The EA process has been inadequate to assess these impacts.

5. Lastly, there is virtually no gain to Montanans for this plan.

6 { The money that the governor says will be brought to Montana for jobs pales in comparison to the money brought by tourism and fishing industries here. It seems reckless to put these at risk in order to add to the profits of an oil company, especially those made in another country.

7 { An additional concern is that the project itself, the Tar Sands oil extraction, is wrong headed. Inefficient, toxic and extremely damaging, it is not worth getting oil from there. While this transportation plan does not comment on the overall purpose of the plan, I think we need a way to consider the entire and cumulative, rather than incremental impacts. We don’t need to be part of this. As a Montana citizen, I do not want my tax dollars and my highway department to proceed with this plan without further and more complete assessment.

2. See response to Common Comments I and O.

3. The analyses on the potential impacts on grizzly bears as a result of the proposed module transportation project is provided Section 3.10 of the EA. Also, see response to Common Comment I.

4. See response to Common Comments G and M.

5. See response to Common Comment G. Because Reserve Street is 5 lanes wide with a total of approximately 80 feet of pavement, a truck having an unexpected delay would not completely block traffic. There are no anticipated adverse impacts from traffic or noise that would negatively affect real estate values or communities.

6. See response to Common Comment M.

7. See responses to Common Comment E1.

Thank you,  
Beth Schenk, RN

Tom Martin  
Montana Department of Transportation  
Helena, Montana

Gentlemen:

1 { This letter is written urging the Montana DOT to deny any permit to Imperial Oil Company to run monstrous vehicles along Montana highways. It should be denied for even one such conveyance.

2 { If Imperial Oil needs to get these behemoth objects to a place in Canada, let them run on Canadian highways.

3 { Not only are the loads monstrous in size, they are traveling a distance of 350 miles on two-lane roads. That is too great a distance for too big a load and far too many such conveyances are planned.

4 { In addition tar sand mining is an atrocious form of energy development. It is destroying vast areas of Alberta. Just today Steve Black, legal adviser to Sec. Salazar, stated that oil shale in the United States is not ready for prime time. It is not ready yet for the United States and certainly is not ready for Alberta when the cost of obtaining such oil are combined with the wanton destruction of the environment it cannot offset the short-term benefits.

Oil shale development has many irreversible impacts on the environment and on public health.

5 { Oil shale development furthers global warming and even if that development occurs in Canada the effects of global warming are felt in Montana. We should not support making global warming worse.  
The weak Environmental Assessment for this plan ignores, to a too great degree, health impacts and environmental impacts.  
It does not even mention the matter of global warming.

**SCHERZER, ERNEST**

1. Comment noted.
2. See response to Common Comment D1.
3. Comment noted.
4. See response to Common Comment E1.
5. See response to Common Comment P.

6 { I realize that Imperial Oil has offered some funds for highway repair, turnout repair, etc. and states it will cover the cost of any damage and then some. I doubt that is true. It also appears to be a subtle form of "bribery" to get the plan more readily approved without complete consideration of all impacts.

7 { I truly believe that an Environmental Impact Statement is required for this project and it must include the effects of global warming.

Thank you,

Ernest Scherzer  
 33 Lone Wolfe Ln  
 Trout Creek MT 59874  
 406-827-0305

6. See response to Common Comment L.

7. See responses to Common Comments B and P.

1 { MDT MT: I am writing in opposition to the plan by Exxon/Mobile to transport large loads up the Lochsa, through Missoula, up the Blackfoot, and then all the way up the Rocky Mountain Front Range, total opposition! There is not enough economic benefit or benefit of any imagination to offset the personal impact, the public impact, and the impact on our unreplaceable, incredibly beautiful environment. I could go on, but my opposition is unchanged and heart felt. I, a citizen of Montana, request your opposition to this insulting plan.

Thank You for your consideration,

Daniel Schneider  
 603 Linden St.  
 Missoula, MT 59802

**SCHNEIDER, DANIEL**

1. Comment noted.

MDT:

Why should Montana assist in any way the tar sands development?????

The only good thing economically for Montana will be some temporary employment or overtime for a few permit inspectors.

I'm sure MEIC will enumerate for you all the health, environmental, and global warming ills that will flow from the development of the tar sands.

**SCHROETER, FRANKLIN E.**

<p>1 { I am also sure that it may be beyond the scope of MDT's involvement with the project.....BUT if you take a look at a map (Imperial Oil is hauling their oversized hardware from Korea) you will find that they could unload the stuff at Prince Rupert, BC (I was there 40 yrs ago on an Alaska Highways ferry) load the vessels, machinery, whatever onto trucks and drive to Prince George, Grande Prairie, Edmonton, and points north. So why are they lengthening their sea and river voyage by 500 miles south just to get to Lewiston with what looks to be about the same highway mileage and snaking their way back north through the semi back roads of Montana????</p> <p>I realize they can't squeeze some of these items under a freeway overpass. I would gamble that there are very few obstacles and no freeways between Prince Rupert and the tar sands destination that couldn't be easily overcome.</p> <p>Thanks for doing what you can to keep this abomination of a project north of the border where there are far fewer people who would have to endure this so called temporary inconvenience.</p> <p>Thanks also for the opportunity to comment.</p> <p>Yours very truly, Franklin E Schroeter 255 Boon Rd Somers, MT 59932</p>	<p>1. See response to General Comment D1.</p>
<p>1 { There is no need to prevent oversized vehicles from traveling MT. The licenses and fees help to maintain our roads. This type of industry is necessary for MT to remain viable. Thank you for your time.</p> <p>Tim Scott</p>	<p><b>SCOTT, TIM</b></p> <p>1. Comment noted.</p>
<p>1 { Let them truckers role...-10-4</p>	<p><b>SELPH, WILLIAM</b></p> <p>1. Comment noted.</p>



Please include the attached op-ed in your public comments

Great Falls Tribune      GUEST OPINION      May 9, 2010

## MDT review of giant trucks in state fell several points short

**By STEVE BENINGER**

The Montana Department of Transportation is about to open up Montana's scenic highways to month-size truck shipments of Korean-manufactured equipment, weighing up to 170 tons, for ExxonMobil tar sand operations in northern Alberta.

MDT's review process has been cast in economic terms rather than in broader ecological and climate change issues. Unfortunately the economic analysis used in MDT's review process does not recognize all the costs that will be borne by Montana taxpayers, employees, and households.

Several major cost impacts are either assumed away or ignored. Lack of credible and comprehensive costs to Montana is especially serious because MDT's authorization of the project may be repeated for other oil companies creating an industrial transportation corridor along western Montana rivers and highways.

MDT is touting this proposal as a job-creation stimulus; however, the environmental assessment (Kearl Transportation Module Project, [www.mdt.mt.gov](http://www.mdt.mt.gov)) lacks credible, systematic analysis of the actual jobs that would be created for Montanans.

The assessment estimates 130 Montana jobs from one-time and auxiliary shipment activities. The other job estimates are already employed workers, including those employed by out-of-state firms.

MDT's assessment fails to balance their claimed positive economic impact with significant associated costs to Montanans. It assumes no job or business revenue losses in Montana's outdoor recreation and tourism industry; no costs due to log rig accidents, and no long run costs for MDT's review, supervisory and road-maintenance expenditures on the project.

Jobs in Montana's outdoor recreation and tourist industry are based on the attractive power of our scenic outdoors, mountains, forests and the highways providing access to these attractions.

Tourist survey data show that visitors to Montana come for mountains and forest, open spaces and wildlife, and cold water streams full of trout. Surveys also show positive visitor perceptions of Montana giving our state high scores for road conditions and environmental stewardship.

The month-size equipment module shipments, transported by a Dutch-based company, will be up to 230 feet long, 30 feet high, and 24 feet wide and will, according to the MDT report, require significant highway construction and modifications along the scenic Lewis and Clark river corridor. The MDT report assumes there will be no adverse effects on Montana's streams or on the state's outdoor recreation and tourism industry.

Potential reductions in out-of-state visitors from the project would lead to job losses in this \$4.3 billion industry.

Reductions in outdoor recreation and tourism visitation will affect all types of western Montana business and employees, including hotels, restaurants and bars, gas stations, and other businesses, many of them small businesses who directly depend on recreation and tourism travelers on western Montana highways.

In Cascade County alone, outdoor recreation and tourist spending by out-of-state visitors is more than \$165 million, while the counties bordering the Rocky Mountain Front receive \$118 million. These expenditures represent a significant number of jobs every year, jobs that are assumed to be completely unaffected by the big rigs.

MDT assumes a zero accident risk for the 170-ton big rigs. The no-accident assumption is particularly questionable because the 200 shipments, slated to begin this September, will run year-long at night over Lolo Pass, through Missoula, up the Blackfoot, over Ruger Pass and up along the Rocky Mountain Front to the Canadian border.

Visualize a 170-ton big rig on Montana's two-lane, rural highways in just a modest winter snow storm.

A credible and comprehensive analysis would allow for potential mishaps, including major accidents that would adversely affect human life, wildlife and the environment.

Such accidents would entail cleanup costs along with law enforcement and emergency medical costs and traffic routing issues on the two lane highways. Many of these costs would fall on local governments, communities, and taxpayers.

A third omission in the assessment document is an absence of explicit cost accounting for MDT's resources provided in the planning and implementation, design of the project, and a reasonable question of such costs over the life of the project.

The Montana Department of Transportation is already spending taxpayer dollars that are not included in the environmental assessment.

The analysis states that "MDT will cover costs of review of permit applications, review of the EA, construction oversight and normal obligations for road maintenance."

These costs are ultimately paid for by Montana taxpayers with the "normal obligations for road maintenance" potentially becoming quite significant. The limited costs to Montana taxpayers would, indeed, be a subsidy to ExxonMobil's tar sand operations in Canada.

The impending decision by MDT to allow creation of an industrial transportation corridor in western Montana, based on a



This is a front view of the typical big rig carrying modules of oil equipment. A contractor wants to bring some 200 of them through Montana starting in September, bound for ExxonMobil's fields in the oil sands of northern Alberta.

**Public comment**

The Montana Department of Transportation is accepting public comment on the environmental assessment of the Kearl Module Transportation Project through Friday, May 14. Send comments online at [www.mdt.mt.gov](http://www.mdt.mt.gov), or in writing to Ken Martin, MDT Environmental Services Bureau, PO Box 207001, 2701 Prospect Ave., Helena, MT 59620.

A comprehensive programmatic review of all social, economic, and environmental impacts and their costs should be conducted.

Such a comprehensive analysis showing the costs and gains to Montana taxpayers should also include the costs of alternative transport routes through Canada.

The inadequate assessment conducted thus far does not answer these questions and is insufficient to make a decision with such far-reaching effects on our economy and environment.

Steve Beninger, Missoula, is a Ph.D. economist with more than 40 years of professional background in economic impact and cost analysis.

**SENTZ, GENE**

1. Comment noted.

Dear MDT: (Comments on Kearl heavy equipment haul corridor)...

In an AP article in the Great Falls Tribune (5-4-10), Montana's governor "Schweitzer downplayed concerns that northwestern Montana will become a permanent transportation corridor for big rigs going to the Canadian oil fields and elsewhere. 'That's not the proposal at all,' he said. 'This is temporary for 200 loads and nobody's proposed a permanent corridor.'"

In truth, however, the EA itself [www.mdt.mt.gov/pubinvolve/eis\\_ea.shtml](http://www.mdt.mt.gov/pubinvolve/eis_ea.shtml) certainly does imply that it is "reasonably foreseeable" that this route will become a "High/Wide corridor" for oversized rigs.

On p. 16 of the EA under "Reasonably Foreseeable Activities," the list includes: 'Future 32-J permit loads...similar to this project; Other oversized loads (...houses, wind turbine blades...); MATL transmission line construction... etc.'

On p. 24 of the EA under "Cumulative Impacts," it says, "MDT believes it is reasonably foreseeable that additional oversized loads would want to use the route."

**SENTZ, GENE**

1. See response to Common Comment K.

2 { On p. 34 of the EA under “Cumulative Impacts,” it again notes, “Following completion of the construction work, additional oversized loads may want to use the route.”  
 Even more telling, the MDT’s “Proposed High and Wide Corridors Briefing” (July 2009) [http://www.mdt.mt.gov/other/tranplan/external/dirpresentations/RAT\\_EXXON\\_HIGH-WIDE\\_LYNCH\\_070109.pdf](http://www.mdt.mt.gov/other/tranplan/external/dirpresentations/RAT_EXXON_HIGH-WIDE_LYNCH_070109.pdf)  
 notes on p. 12 that this project “Proposes to create permanent ‘High/Wide Corridors’ through Montana.”  
 For many people living directly along this route, this project seems like a very bad idea. Under your in-depth study of ‘Cumulative Impacts’ please be careful to include the probability of this route becoming a permanent corridor for big rigs hauling massive oversized loads in the future, and all of the reasonable foreseeable cumulative impacts of that possibility or probability.  
 And remember Murphy’s Law: “Anything that can go wrong will go wrong.”

3 { It is apparent that a full-scale Environmental Impact Statement should be required for this project.  
 Respectfully,  
 Gene Sentz  
 Choteau, MT 59422-0763  
[friends@3rivers.net](mailto:friends@3rivers.net)

2. See response to Common Comment K.

3. See response to Common Comment B.

Tom Martin  
 MDT Environmental Services Bureau  
 2701 Prospect Ave.  
 PO Box 201001  
 Helena, MT 59620-1001

**SENTZ, GENE**

Re: Kearl Module Transport Project

Dear Mr. Martin, et al, at the Montana Dept of Transportation Environmental Services Bureau:

The whole tar sands project in Canada is a very bad idea, and hauling this massive equipment through Montana also is a terrible proposal. Please do not allow it to happen.

1 { Just for starters, the equipment-hauling project itself is both an international issue and an interstate commerce project that certainly should require a full-scale Environmental Impact Statement at the federal level.

2 { Hauling this huge equipment through Idaho and western Montana and then up through Augusta and Choteau and Valier, etc, on into Alberta would require extensive road construction for turnouts in many places along watercourses, and within the habitat of threatened and endangered species.

3 { And this does not include mention of the Canadian tar sands project itself, which will most certainly pollute the earth in many ways too numerous to mention. Pure and simple, it should not happen at all.

Respectfully,

Gene Sentz  
 PO Box 763  
 Choteau, Montana 59422  
[friends@3rivers.net](mailto:friends@3rivers.net)

April 24, 2010

Mr. Tom Martin  
 MDT  
 PO Box 201001  
 Helena, MT 59620

Dear Mr. Martin and MDT:

1 { MDT must consider all the devastating cumulative impacts of hauling this massive equipment through some of the finest fisheries & wildlife habitat and scenic highway system in the state of Montana, and indeed in the whole of North America, as well as the cumulative impacts of the tar sands development itself, including effects on climate change. Highway construction for opening this route to huge equipment sets a terrible precedent for making this corridor the route for industrial hauling and development of future projects.

3 { A comprehensive in-depth study surely demands a full-scale environmental impact statement by MDT, before any permits are issued to transport this giant equipment.

1. See responses to Common Comments A and B.

2. See responses to Common Comments I and O.

3. See response to Common Comment E1.

**SENTZ, LINDA AND GENE**

1. See responses to Common Comments S, I, J, E1, and P.

2. See response to Common Comment K.

3. See response to Common Comment B.

Respectfully,

Linda & Gene Sentz  
 PO Box 763  
 Choteau, MT 59422

MDT:

The proposed route for the hauling of this massive equipment includes some of the most beautiful scenic areas and finest fisheries and wildlife habitat in North America.

1 { This hauling project would set a terrible precedent for making this spectacular route a corridor for future industrial hauling and industrial development Do NOT allow it!  
 SentZes  
 Choteau, MT 59422-0763

**SENTZ, LINDA AND GENE**

1. See response to Common Comment K.

1 { We are in favor of this project, Montana needs all the work and economic stimulation it can get.  
 Vern & Joyce Sharp  
 2052 Styler Dr  
 Condon MT 59826

**SHARP, VERN AND JOYCE**

1. Comment noted.

Like many I've been curious about the Exxon transportation plan. Curious enough that I looked at the EA to try to answer a question I had regarding an alternate route.

**SHERIFF, STEVEN**

1 { Using Kitimat, BC as the port of Entry would solve all sorts of the associated problems and greatly reduce the costs of transport. Yet, in the EA (Section 2.3 - Alternatives Eliminated) they apparently only considered Prince Rupert and NOT Kitimat. This is a weird decision. The Kitimat highway is the wide, paved haul road for bauxite to the Rio Tinto-Alcan smelter. The route would decimate the total mileage (ship & road) from Korea to Alberta.

1. Imperial Oil investigated this route. There are two truss bridges between Kitimatt and Terrace with no detours available.

Kitimat is the third largest deepwater port in BC and is a bit southeast of Prince Rupert. The road from Kitimat to Terrace avoids the height restriction 35 km east of Prince Rupert.

Steven Sheriff  
 Professor of Geophysics  
 University of Montana  
 Missoula, MT 59812-1296  
[www.umt.edu/geosciences](http://www.umt.edu/geosciences)

1 { At a minimum you need to require a full EIS for the Kearsarge Module Transportation Plan. The Lewiston to Great Falls segment is particularly poorly conceived. I recommend, and hope, you block it. Here's why:

2 { 1. In the 1950s through early 1980s we established transportation corridors via the interstate system. To do so, we sacrificed valley bottoms and river floodplains. We moved neighborhoods and decreased property values for those who got a new transportation corridor in their laps. We changed zoning to suit the new system. Let's use those existing corridors and bring them up to date and capability as necessary.

Investing in our existing system, via new or rebuilt entrance and exit ramps to bypass low overpasses for over-size loads, fits current zoning, current use, existing economic development, and is within everybody's expectations.

3 { 2. There is no contingency plan for the inevitable problems of hauling excessively large loads on the existing two lane highway up and over Lolo Pass. Consider roadway failure, truck breakdowns, driver screw ups, the normal frequency of car wrecks, forest fires, and heart attacks. The only work around is a dirt road via Hoodoo Pass to Superior, MT. What happens when a mudslide, minor rockfall, car wreck, or small avalanche pins several vehicles between the slide and one of the huge loads with no nearby turnout? Can these loads be backed up to a turnout? A third lane is mandated along the whole route.

4 { 3. A full economic analysis is mandatory. Commercial fishing and rafting trips, the existing trucking industry, and recreational users will all be adversely impacted by the proposed plan. Exxon/Imperial might be saving money but everybody else will lose money. The current economy in the region is developed around a wild and scenic river system. It makes no sense to current users and the public to decimate that in order to save a few dollars for Exxon/Imperial.

5 { 4. I've heard the word on traffic hold-ups is "no more than 10 minutes". How many times will a commercial trucker be held up for ten minutes in a day? It should be specified as ten minutes per trip, not ten minutes every thirty miles. How large are the penalties for Exxon/Imperial? The penalty for transgression must be sufficient so that Exxon/Imperial will not simply pay the penalty rather than avoid holding up traffic.

6 { 5. The EA is farcical on alternative routes. Regarding British Columbia, the Kitimat-Smithers-Prince George-Dawson Creek segment is not even mentioned. The Smithers-Kitimat segment is a modern wide highway used for hauling large trucks of bauxite to the smelter at the deep water port in Kitimat BC. There must be a reason Exxon/Imperial wants to avoid it. Surely,

**SHERIFF, STEVE**

1. See response to Common Comment B.

2. See response to Common Comment D2.

3. See responses to Common Comments H1 and H2.

4. See response to Common Comment M.

5. This analysis is included Section 3.6.2.6 of the EA. The ARM provides for confiscation of permits and/or administrative penalties at 18.8.901 and 18.8.902.

6. See response to Common Comment D1. Also, there are two truss bridges between Kitimat and Terrace with no detours available.

building a few new snowsheds, or whatever might be required, is less expensive than the true cost of hauling from the mouth of the Columbia River to Alberta via Lolo Pass. Perhaps BC would charge the true cost of using those roads for the transport of oversize loads? Is this why that route is not mentioned?

7 { If Montana gets saddled with this transportation boondoggle, at a minimum we must recover the true cost to Montana. That includes restoring our roads and river access to their current condition at the end of the initial hauling period. The last thing we want is a new corridor replacing our current interstate system. Let's use this opportunity to bring the interstate up to current commercial needs.

Sincerely,  
 Steven Sheriff  
 706 Lolo Street  
 Missoula, MT 59802

7. See response to Common Comment L.

Dear Montana Department of Transportation

**SHERMAN, ROGER AND SUSAN**

1 { We Montanans should NOT expedite the Alberta Sands Development by allowing the convoys of huge trucks and equipment to disrupt Montana travel and communities across a wide path of Montana.  
 Tar sands are an irreversible disaster to the environment and human health. These tar sands produce millions of metric tons of greenhouse gases; in fact more greenhouse gases than even regular oil production by a factor of 3 to 1. This mining destroys ground water and destroys valuable trees that help use excessive CO2 emissions.

1. See response to Common Comment E1 and Common Comment P.

2 { I urge you to prepare a full environmental impact statement and not just an environmental assessment before you would issue any permit to transport this HEAVY equipment across our state.

2. See response to Common Comment B.

Thank you,  
 Roger and Susan Sherman  
 6203-H Monterra Ave  
 Whitefish MT 59937

Dwane Kailey, P.E.  
 Chief Engineer  
 Montana Department of Transportation  
 PO Box 201001  
 Helena, MT 59620-1001  
 Re: Karl Module Transportation Project

May 10, 2010

**SIGRIST, ELLIE**

Dear Mr. Kaily:

Please take into consideration the following comments I am submitting in response to the Environmental Analysis for the Karl Module Transportation Project.

- 1 { Given the apparent lack of adequate analysis of cumulative impacts covered within this EA, I strongly hold the position that further and more intensive scrutiny is necessary in the form of an Environmental Impact Statement conforming to the Montana Environmental Policy Act and the National Environmental Policy Act.
  - 2 { **Potential future corridor for similar loads** - There is no mention in the current EA that addresses the impacts created by establishing this route and thus attracting future use of it for high, wide and oversize loads. It is my understanding that there has been interest establishing this as a permanent route for such loads. While it may not be the intent of this particular project, I believe not addressing the potential impacts of this likelihood is negligent.
  - 3 { **Missing Alternative** - Also problematic to me is that I see no mention of the existing transportation route from the Port of Houston as an alternative that was considered. Given the historical use of that transportation route for like size loads, I see no need to establish another route. If that route was not even included, how many more routes were not considered in this analysis.
  - 4 { **Inadequate analysis of Alternatives** - Additionally, the considered alternative routes do not demonstrate cost/impact comparisons across alternatives. What if detours were constructed around some of the restrictions such as the overpass on Highway 1 in Canada. There is no mention of or cost analysis for whether or not something could be constructed to bypass these restrictions.
  - 5 { **Public Involvement/Scoping process** - It is my understanding that during the scoping process it is common to receive public comment to help identify concerns prior to selecting an alternative. I question why this did not occur for a project of this scale and affecting so many communities in Montana. Given this, I would request that the public comment period be extended so that more Montanans can become more educated and familiarized with this project and its potential impacts on their lives.
- 1. See the responses to Common Comments R, A and B.
  - 2. See response to General Comment K.
  - 3. See response to General Comment D1.
  - 4. See response to Common Comment D1.
  - 5. See response to Common Comment F1.

<p>6 { <b>Global impact</b> - Given that this project has the potential to contribute toward much broader overall impacts an Environmental Impact Statement would have been more appropriate. Not only are some of these highways federal, but also the global impacts this route and potential future corridor would contribute towards climate degradation. These alone seem like they would tip the scale toward an EIS.</p>	<p>6. See the response to Common Comment B.</p>
<p>7 { <b>Road Maintenance</b> - I did not notice any mention of projected costs or plans for repair and maintenance of the roads after these loads drive through. It seems obvious that such weights from the proposed traffic will prematurely deteriorate the road surface and bridges. Such costs should be shouldered by the oil company and not placed as a burden on the state or taxpayers. As it is, it seems that road maintenance and upkeep for the state of Montana is already burdened. This project would only burden it more with continual need for maintenance especially if the route becomes a main corridor for oil companies.</p>	<p>7. See the response to Common Comment L.</p>
<p>8 { <b>Road Jurisdiction</b> – I question why if some of these roads are federal highways, why do they not have to abide by NEPA or an EIS, rather than MEPA? In particular, those roads within USDA National Forest lands?</p>	<p>8. See response to Common Comment A.</p>
<p>9 { <b>Sediment &amp; Bull Trout</b> – I have grave concerns for increased sediment in Lolo Creek, and the Blackfoot River, in particular, from construction of new and modified turnouts. The EA does not seem to address this adequately. It is my understanding that Lolo Creek already suffers from too much sediment and such construction would only increase this problem and be problematic to bull trout habitat. Additionally, the increased amount of salting and sanding to occur along the creek and river corridors will also add to the sediment load and be problematic to fisheries habitat.</p>	<p>9. See the response to Common Comment I and O. MDT does not anticipate increased salt or sand usage on the roadway.</p>
<p>10 { <b>Visuals</b> – I find adding so many large turnouts along this route quite problematic just in regards to scenic beauty. Much of this route is through beautiful country and I enjoy driving in these areas for that beauty. The number and size of turnouts will certainly diminish the scenic quality of these areas.</p>	<p>10. See response to Common Comment J.</p>
<p>11 { <b>Traffic flow</b> – While much effort will be made to travel through some areas at night in an attempt to reduce traffic flow problems, in all likelihood problems will arise whether during the daytime or at night. Be it breakdowns or accidents or unruly, impatient drivers, such happenings will disrupt the planned schedule and changes will be made. Impacts from such circumstances should be addressed.</p>	<p>11. See response to Common Comment G.</p>



12 { **Breakdowns and accidents, etc** – as mentioned above impacts from unsuspected circumstances must be considered for all sections of the proposed route. Of course no one plans for an accident. But with the current oil spill in the Gulf of Mexico in mind, planners must consider worst-case scenarios and have a plan other than just contacting the local authorities. What are the impacts to daily drivers if one of these rigs breaks down? What are the impacts on the creeks and rivers this route parallels if one of these rigs accidentally falls into the river or creek? What are the impacts to someone needing emergency care if the emergency care vehicles cannot get past the rig that broke down on Highway 12, for example, and there is no alternate route?

13 { **Tourism** – There seems to be no mention of the effects on tourism, which is an important part of the Montana economy. Unexpected delays along this route for unsuspecting tourists would make for some unhappy campers. Too, those tourists who know about the potential of delays from the rigs on this route may just decide to visit another area, which could significantly impact local economies.

14 { **Economic benefits to Montana** – I question the accuracy of the proposed stimulus to Montana’s economy. While I’m not an economist, I don’t believe there will be a huge impact given that many of the people operating the vehicles and support will already be employed by the oil company. Short term construction for the turnouts cannot be that much of a boost. Such projections are only typical of what the corporation itself would estimate. A more thorough and realistic analysis is necessary.

15 { What are the overall environmental and economic impacts to Montana if it contributes to the Tar Sands Development?  
How does the Tars sands development undermine the Montana Constitution’s guarantee of a clean and healthful environment?

16 { What about the impacts as a whole project - from the Columbia River to Alberta - considering this analysis only looks at one portion of the whole?

The list of questions can go on because this EA does not adequately address all of the impacts this project could incur. The scope of such a project surely calls for an EIS.

Thank you.

Ellie Sigrist

818 Grand Ave.

Missoula, MT 59802

ellies@modwest.com

12. See responses to Common Comments H1, H2, and H3.

13. See response to Common Comment M.

14. The economic analysis is based on current contracted value and estimated values for the Montana residents involved with permitting and construction work, along with an estimate of the value of transportation for Montana residents. Also see response to Common Comment M.

15. See responses to Common Comments E1 and R.

16. See responses to Common Comments E1 and E2.

<p>1 { Sending this email in support of Imperial/ExxonMobil's request to run 200 supersized vehicles through parts of Montana to the Canadian oil fields.</p> <p><i>NATHAN SLEETH INSIDE SALES GASES PLUS NORCO BILLINGS, MT (406) 252-5339 office (406) 252-1765 fax Email: nathans@gasesplus.com</i></p>	<p><b>SLEETH, NATHAN - GASES PLUS NORCO</b></p> <p>1. Comment noted.</p>
<p>1 { I am opposed to bringing the large loads along the Lochsa on highway 200. It is narrow and curvy in places and regularly there are accidents. It is a prime recreation corridor, with people driving through at all hours.</p> <p>Steve Slocomb email: video@montana.com 406-360-1226 376 Zimmerman Hamilton, MT 59840</p>	<p><b>SLOCOMB, STEVE</b></p> <p>1. Comment noted.</p>
<p>Dear Tom Martin and MDT,</p> <p>1 { I am writing to express serious concern about DOT's proposal to allow massive mining equipment across some of western Montana's most sensitive, precious, and scenic highways. I live in the Blackfoot Valley and travel Highway 200 nearly every day. It frightens me to think of this huge equipment balanced along our already dangerous canyons and mountain passes. I can see NO BENEFIT to citizens of this state in allowing such dangerous, hazardous uses of our most important tourist byways, and most beloved valleys and rivers.</p> <p>Once started, there will be no way to end such industrial uses of secondary two lane highways such as Hwy 200 and Hwy 93. I believe that's why we have interstates! In view of such potential dangers, it is not only reasonable, but necessary, to demand a full environmental impact statement before any rash and dangerous decisions are made that will affect the future of our region.</p> <p>I urge you to act on behalf of the citizens of Montana, and not in behalf of special, out of state interests. I hope you and other agencies of the state will get started on drawing up a complete EIS as soon as possible.</p> <p>Thanks for your consideration.</p> <p>Sincerely, Annick Smith 898 Bear Creek Road Bonner, MT 59823</p>	<p><b>SMITH, ANNICK</b></p> <p>1. See responses to Common Comments B and K.</p>

To Whom It May Concern [that means all of us in Western Montana],

I have just viewed photos of the 'Big Rigs' you plan to allow passage through some of western Montana's most delicate, scenic, environmentally fragile, and high tourist areas, and I AM SHOCKED!!!!

1 { How can our elected officials allow such dangerous, destructive, and huge vehicles access across our two-lane historic highways????? This will affect not only local users such as myself, but anyone doing business in or visiting our state.

2 { We citizens have been duped by big oil once again. And we demand an extended comment period and a full EIS before any such actions, construction, or permits are issued.

3 { Please listen to the voices asking your reconsideration of this matter. We all vote, and our voices will be heard one way or another.

3 { I urge the DOT, the Governor's office, the Legislature, and any other elected or appointed officials in charge of deciding what happens regarding 'Big Rigs' in our state to delay action until all the facts are in hand, and the people's voices are heard.

Sincerely,

Annick Smith  
898 Bear Creek Road  
Bonner, MT 59823

**SMITH, ANNICK**

1. See response to Common Comment G.
2. See responses to Common Comments B and F1.
3. Comment noted.

1 { I live on HIWAY 12 AND DO NOT WANT MY PEACEFUL VALLEY RUINED BY BIG RIGS DRIVING THROUGH ALL NIGHT .We moved here to have piece and quiet not monster machinery going down the hiway. Please continue to send on the old route! the country and people there are accustomed to it and since its already established there is no nedd for enviromental studies and all the costs involved. This will do NOTHING for Montana!!!!

PLEASE STOP THIS BEFORE ITS TOO LATE AND WE BECOME A THOUROUGH FARE FOR EVERYONES POLLUTING ENDEAVORS.

Sincerely,

Drew and Laura Smith  
Box 1089  
Lolo, Mt 59847

**SMITH, DREW AND LAURA**

1. See response to Common Comment D1.

Tom Martin  
Montana Department of Transportation  
P.O. Box 201001  
Helena, MT 59620

**SMITH, JENNIFER**

Dear Mr. Martin,

1 { As I learn about the Kearl Module Transport Project it becomes clear that a full environmental impact statement (EIS) needs to be prepared. There are far too many questions left unanswered by the current environmental assessment (EA), and the potential impact of this project cannot, and should not, be minimized or understated. To approve a project of this magnitude though an EA only is both irresponsible and negligent.

{ The KMTP needs to be closely scrutinized for the huge proposal it really is. A full-scale EIS is the only way to comprehensively address all the social, economic and environmental impacts and costs involved.

Sincerely,

Jennifer Smith  
 1306 3rd Ave North  
 Great Falls, MT 59401  
[jlsmithvla@hotmail.com](mailto:jlsmithvla@hotmail.com)

1. See responses to Common Comment B, I, M, and O.

1 { From reading as much as I can find about the many impacts of big rigs moving greatly oversized equipment along Montana roads to Canada for tar sands extraction which is expected to last for decades, it is clear there will be multiple major impacts that should require an environmental impact statement (EIS). The scale of this infrastructure project is beyond the scope and capacity of an environmental assessment.

And Montana has a lot to lose.

2 { The potential job loss from impacts on already existing outdoor recreation and Montana's growing tourism industry will more than offset the number of jobs created by building the infrastructure for the big rigs. These existing and potential Montana jobs in recreation and tourism will amount to millions of dollars more than the one-time jobs created by the big rig project.

3 { The economic impact of a project putting in permanently enlarged infrastructure to carry oversized equipment on over-sized trucks will not end when this big rig project is over. Other projects will likely apply to use it for similar purposes in the future. The impacts need to be known now before it is built which is why I believe an EIS is required. Governor Schweitzer was quoted in the Missoulian saying if this was a permanent infrastructure project it would require an EIS.

**SMITH, LINDA**

1. See response to Common Comment B.

2. See response to Common Comment M.

3. See response to Common Comment B.

Please consider Montana's long-term future best interests in terms of what attracts visitors to Montana.

Sincerely,  
Linda Smith

I would like to add my voice in opposition to the proposed transport of 24-wide trailers along the Lochsa and Blackfoot Rivers, as well as the numerous small communities through which they would pass. I find it totally incomprehensible why Montana and Idaho have to be saddled with intrusions such as this in areas exemplified for their scenic and wildlife qualities.

1 { To date, I have heard no explanation of why a large port such as Vancouver, and the fine Canadian highways are not adequate for such transportation, particularly as the products are destined for the Canadian province of Alberta. I can only assume that it is more economical to come the southern route. I have traveled both the Lochsa route and many times the Blackfoot route, particularly in the winter when it was often icy and difficult to drive. In snowy conditions, which were not infrequent, maneuvering around the semis which already travel this road was difficult.

2 { How does Montana benefit by this proposal? Listening to the PR man from Imperial Oil who touted the jobs that would be awarded to local firms, but was unable to come up with any numbers, one wonders. Are the pullouts that the company is proposing really additions to the roads that Montana wants? It will be stuck with them (and their maintenance) forever. There are many aspects to this project which seem to advantage the companies but not Montana or Idaho.

3 { These are just a few of many questions which come to mind. Please consider a full EIS on this proposal before going hastily into the project, for the future of Montana.

Sincerely,

Minie Smith  
Independent researcher and resident of Missoula

To Whom it May Concern,

1 { The Kearl Module Transport Project should NOT be allowed to travel through MT. It is an environmental hazard, a traffic nightmare for the residents and visitors along its route, it would disturb the peace and beauty of our state, and it sets a bad precedence for further like projects. There is nothing positive in this project for MT, only a lot of negatives. Please do NOT allow this project access to MT.

Stephanie Smith

**SMITH, MINIE**

1. See Section 2.3.1 of the EA where the problems with this route are explained.
2. Table 15 of the EA provides information on the economic benefits to Montana. See response to Common Comment L.
3. See response to Common Comment B.

**SMITH, STEPHANIE**

1. Comment noted.

1 { It would be severely irresponsible of Montana to allow this equipment to pass through this state to Canada. The MDT's environmental assessment does not adequately address the issue of global warming from the proposed project in our neighboring provinces. Global warming is an issue that needs to be addressed at national level. Tarsands mining is one of the most environmentally unfriendly forms of extraction around today and promoting this project would be a slap in the face to what little headway this state has made in the fight against global warming. I'm sure you guys will allow this project regardless of the public opposition and just say that it will bring jobs and money to our state, which is a very poor reason and is the kind of attitude that has got us into the mess we're in right now.

Tony Smith

**SMITH, TONY**

1. See responses to Common Comments P and E1.

Dear MT Dept. of Transportation:

As a life-long Montanan, I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Thank you for your time and consideration. I look forward to hearing about your actions on the matter.

Ryan R. Snyder  
 425 S 2nd St W  
 Missoula, MT 59801

**SNYDER, RYAN**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

1 { I am adamantly OPPOSED to allowing these huge rigs to travel through Montana in order to further rape and pillage the landscape of any country. OURS OR CANADAS !  
 As a shareowner of Exxon/Mobil saying NO! may not help my long-term finances. It certainly will degrade the planet for the 7th generation and THAT is more important !

Janet Sperry  
 1823 Highland  
 Helena, MT 59601  
 406-443-2749

**SPERRY, JANET**

1. Comment noted.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • **Conduct a programmatic review for the establishment of this permanent industrial corridor;**
- 2 { • **Require real alternatives to be considered;**
- 3 { • **Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;**
- 4 { • **Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts**

I have been going to Montana now for over 25 years to enjoy the beautiful unspoiled wilderness that is getting more and more difficult to find in this country. Now that I'm retired I will be moving there in the very near future and am understandable concerned about this industrial corridor. I wonder if we, the people of this fragile planet, will ever put it's protection above money.

The value of our natural world cannot be measured in dollars and cents. It has a much more intrinsic value than that.....one that I feel many will not realize until it is gone. I would like my children, their children & every future generation to be able experience these natural wonders.

Steve Stark  
 2517 Naturewood Dr.  
 Oakdale, CA 95361

**STARK, STEVE**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

<p>Tana Starkey, Lolo, MT.</p> <p>1 { Sail to Prince Rupert, BC from Korea. Thence to Ft. McMurray, AB. 1700 fewer miles by sea, but a few more overland. No Columbian locks to pass (and pay for), and keeps this a Canadian project in Canada!</p> <p>Good Day!</p>	<p><b>STARKEY, TANA</b></p> <p>1. See response to Common Comment D1.</p>
<p>1 { Instead of sailing from Korea to Lewiston, ID, and then driving to northern Alberta; how about sailing to Prince Rupert, BC (or possibly Kitimat, BC), and thence overland to the destination. Shorter distance, fewer tolls to pay (I'm thinking of Columbian locks).</p> <p>Thank you for your consideration... Tana Starkey Lolo, MT</p>	<p><b>STARKEY, TANA</b></p> <p>1. See response to Common Comment D1.</p>
<p>Dear MT Dept. of Transportation:</p> <p>I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:</p> <p>1 {</p> <p>2 {</p> <p>3 {</p> <p>4 {</p> <ul style="list-style-type: none"> <li>▪ Conduct a programmatic review for the establishment of this permanent industrial corridor;</li> <li>▪ Require real alternatives to be considered;</li> <li>▪ Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;</li> <li>▪ Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts</li> </ul>	<p><b>STARRATT, CHRIS</b></p> <p>Form Letter 1</p> <p>1. See response to Common Comment C2.</p> <p>2. See responses to Common Comments D1 and D2.</p> <p>3. See response to Common Comment M.</p> <p>4. See responses to Common Comment A.</p>
<p>To Whom It May Concern:</p> <p>1 { I do not believe that adequate time is available to review all of the implications of the Kearn Module Transportation Project. Please extend the comment period to allow additional time to review this proposal.</p> <p>I appreciate the opportunity to provide comment, and request you send me any information relating to this project that becomes available.</p>	<p><b>STEENBERG, TOM</b></p> <p>1. See response to Common Comment F1.</p>



Sincerely,  
 Tom Steenberg  
 4802 Aspen Drive  
 Missoula, MT 59802  
 (406) 721-5869  
 firehse@bigsky.net

Dear MDOT:  
 I would like to comment on the proposed Tar Sands project.

1 { Please consider the cumulative impacts that tar sands mining has on the environment and public health over time. The Environmental Assessment did not include future impacts of the new high and wide corridors. Any impact analysis should assess the likelihood of transportation projects of this magnitude occurring in the future.

Thank you for your attention,  
 Debra A. Steigerwalt  
 364 Pine Hollow Rd  
 Stevensville, MT 59828

Dear Mr. Martin,

1 { I am appaled at the proposed plan to grant Montana Department of Transportation permits to Imperial Oil Company for the transport of oversized loads of equipment through Montana. I am especially opposed to the proposal to clear valuable old-growth forests for the transportation of this equipment, as well as the effects of the haul on the air quality of region.

2 { Also, MDOT should consider the cumulative impacts that tar sands mining has on the environment and public health. It is the most toxic and evasive form of oil extraction.

3 { Furthermore, the Environmental Assessment does not include future impacts of the new "high and wide corridors." Impacts analysis should assess the likelihood of transportation projects of this magnitude occurring in the future.

4 { I urge you to NOT GRANT THE PERMIT to Imperial. Consider the devastating future effects this will have on all of us and our children.

Sincerely,  
 Mike Steinberg  
 Missoula,MT

**STEIGERWALT, DEBRA**

1. See responses to Common Comments E1 and K.

**STEINBERG, MIKE**

1. No trees will be cleared for module transportation.
2. See response to Common Comment E1.
3. See response to Common Comment K.
4. Comment noted.

1 { My name is Ronald Stewart and I live west of Lolo just off Hwy. 12. Having read the EA, it leaves much unaddressed in the medical section. There are many accidents up highway 12 and there are also many elderly people that live up hwy 12. The EA needs to address the frequency of emergency callouts( medical, sheriff, MHP) and where they are called to as there are other destinations other than just on hwy 12. We also need the golden hour addressed in this medical assessment. For many accidents life flight is automatically dispatched. What about the calls where life flight cannot land close enough. Also, if life flight is sent due to the highway being blocked below, who is responsible for the additional costs. Fifteen minutes does not sound like much, but with response time and transport time already eating up much of the golden hour, who shoulders the responsibility?

This seems like a very shoddily prepared EA and it only addresses the transportation, not all effects to the area as should be addressed.

2 { Also is this EA only for this project or is this the basis for starting a heavy haul corridor using hwy 12. For a single project this is a possibility, but for a heavy haul corridor, opposition will be formidable.

Ronald Stewart  
14549 Neil Dr.  
Lolo, MT 59847

**STEWART, RONALD**

1. See response to Common Comment H3.

2. See response to Common Comment K.

1 { I strenuously object to the Montana Department of Transportation rushing through this comment process on the Environmental Assessment. The size and complexity of the EA would require much longer than is given to study and comment on specific aspects. That said however, it is obvious this entire project is not good for the state of Montana, for our tourism, recreation, infrastructure, resources, environment or peace of mind. We do not need to subsidize Imperial/Exxon Mobil corporation in their attempt to save a few bucks by outsourcing the construction of the equipment to South Korea. Let them manufacture the proposed modules in Canada near where they are to be used instead of in South Korea and making us bear the burden of transport through not only our state, but the beautiful Lochsa corridor in Idaho that would most definitely be tremendously adversely impacted by this proposal. Just say no to this proposal.

Sincerely,  
Janet Surrena  
1445 42nd. Avenue  
Missoula, MT 59804

**SURRENA, JANET**

1. See response to Common Comment F1.

2. See responses to Common Comments M, D3, and E2.

Hello-

1 { I am writing to express my support for a permit to send 200 convoys of oversized trucks carrying tar sands drilling equipment over two-lane highways in Montana.  
Please provide this important economic support in these troubling times.

Jay

Fredrick G. Sweet  
1815 23rd Ave S  
Great Falls, MT 59405

Attn: Mr. Tom Martin  
MDT Environmental Services Bureau  
P.O. Box 201001  
2701 Prospect Ave  
Helena, MT 59620

Dear Mr. Marin,

1 { I am in favor of letting Exxon Mobil move the large equipment through Montana. It would employ many Montana workers, maybe some of the workers laid off by the Container plant that was shut down because it could not get any logs. I read the article by Mr. Seninger in the Great Falls Tribune, May 9, 2010.  
To me the biggest concern from Mr. Seninger is that Exxon Mobil is mining the tar sands in northern Alberta of which Mr. Seninger does not like. The large trucks moving over Montana roads would reduce tourism very little.

Again, I am in favor of letting Exxon Mobil move their equipment through Montana.

Sincerely yours,

Fredrick G. Sweet

**SWARTZ, JEREMY**

1. Comment noted.

**SWEET, FREDRICK**

1. Comment noted.

1 { 1. DOT regulations require the identification of logical termini for a proposed action. The justification for this appears to be political boundaries, which is an insufficient justification for logical termini. The logical termini needs to be clearly defined.

2 { 2. While some reasonably foreseeable future actions have been defined, those appear to be confined to future MDT actions. Reasonably foreseeable future actions need to include ALL actions regardless of what agency undertakes them. The timeframe used for the cumulative impact analysis is undefined as is the study area. For these reasons, the cumulative impact analysis done is insufficient to reach a conclusion that significant impacts will not occur.

**TAFT, ALEX**

1. See responses to Common Comment E1 and E2.

2. The cumulative effects were analyzed based on activities as defined in 75-1-200(3), MCA. Those activities are described in Section 3.2. of the EA.

- |   |   |    |  |
|---|---|----|--|
| 3 | <p>3. A cumulative impact analysis also requires that both direct and indirect impacts of the proposed action be disclosed. Since it is clear that Tar Sands energy development could not continue but for completion of this proposed action, that energy development must be considered as an indirect effect of the proposed action. For this reason as well, the indirect and cumulative impacts analysis for this project is insufficient to reach a conclusion that significant impacts will not occur.</p>   | 3. | <p>See response to Common Comment E1.</p>  |
| 4 | <p>4. The historic property analysis does not discuss whether or not the SHPO or the THPO concurred with the Determination of Effects. Without this information, there is insufficient information to determine whether or not the proper process was followed in compliance with the National Historic Preservation Act or in compliance with Section 4(f) of the DOT Act.</p>   | 4. | <p>See Section 4.1.1.2 and 4.1.2 of the EA and Sections 4.5 of the Decision Document for information on consultation. Section 4(f) of the DOT Act does not apply to the KMTP.</p>  |
| 5 | <p>5. There is minimal discussion of the effects of tree trimming on historic properties through the Town of Choteau and adjacent to Bonner Dam and Mine. The analysis needs to address the criteria that resulted in the significance of these properties for inclusion on the National Register. Tree trimming may effect the setting of historic properties. This has not been defined</p>   | 5. | <p>See response to Specific Comment C.</p>   |
| 6 | <p>6. The parks, recreation areas and wildlife refuge section is insufficient to determine whether or not a Section 4(f) use will occur. Utility relocations do not address all potential Section 4(f) properties. This section has insufficient information to determine whether or not any future planned parks or trails would be affected.</p> <p>The minimal information provided about potential effects to access and parking in the vicinity of Section 4(f) properties. There is no discussion of consultation with Officials with Jurisdiction regarding existing or future Section 4(f) properties, and in fact, compliance with Section 4(f) is not even mentioned. Overall, this discussion is insufficient to determine whether or not a Section 4(f) use will occur.</p> | 6. | <p>Section 4(f) does not apply.</p>  |
| 7 | <p>7. Compliance with the Environmental Justice Executive Order is not even mentioned. There are likely to be effects to minority and low income communities due to noise (especially since transportation of the modules will occur at night), air pollution, the possibility of spills and other negative effects.</p>  | 7. | <p>Environmental Justice is not a MEPA issue. Executive Order 12898 is a presidential executive order that requires 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 populations and low-income populations. Because MDT is a state rather than federal agency, it is not required to comply with EO12898. That said, MDT does not expect this project to have any disproportionately high and adverse effects on minority populations and low-income populations. Please see the EA and Decision Document for additional impacts discussion.</p> |
| 8 | <p>8. The assessment in the document of potential effects to wetlands does not meet the requirements of the Clean Water Act nor the requirements of the Executive or DOT Order for Protection of Wetlands.</p> <p>There is no functional assessment of wetlands that has been done.</p> <p>Broad statements are made that "the location will be adjusted or mitigation applied to avoid impacts to wetlands" or that "two of the six locations appear to have wetland characteristics and need to be reviewed." Both of these statements indicate that wetland impacts are likely to occur and yet there is a concluding statement that "the proposed project is not expected to affect water resources including</p>   | 8. | <p>See responses to Common Comments I.</p>   |

wetlands." This assessment is completely insufficient and does not meet the requirements of the FHWA Technical Advisory, the Protection of Wetlands Executive Order nor the Clean Water Act. Full survey and delineation of wetlands, including functional assessment needs to be completed. Then both direct and indirect impacts to wetlands needs to be done. Practicable alternatives to the impacts to wetlands needs to be prepared and documented and mitigation needs to be fully defined and committed to.

In summary, this EA is insufficient to determine the direct, indirect and cumulative impacts of the proposed action. It is insufficient to determine whether or not significant impacts will occur.

Alex Taft

332 S 1ST ST W Apt A  
 Missoula, MT 59801  
 406-218-8438

421 South 4th St West  
 Missoula, MT 59801  
 May 12, 2010  
 Tom Martin  
 MDT Environmental Services Bureau  
 PO Box 201001  
 2701 Prospect Ave.  
 Helena MT 59620

Dear Mr. Martin,

- 1 { My wife and I are strongly opposed to MDT approving the Kearl Module Transportation Project and request as a minimum that an EIS, Environmental Impact Statement be required to more honestly assess the potential costs and the environmental and economic adverse impacts on the State of Montana and it's citizens.
- 2 { A 90 day extension in approval of the EA would allow more complete public understanding of the consequences. Identification of alternative less damaging routes should be a part of an
- 3 { EIS. Added cost to Imperial Oil is not Montana's problem. If Imperial Oil or Canada cannot afford a less damaging more costly route, perhaps "not economic to proceed" should be the answer. Don't sell Montana for a one-time "economic activity" of \$67 million. Little more than half of this is new money to Montana.

**TEAGUE, CHARLES AND MARGARET**

1. See the response to Common Comment B.
2. See responses to Common Comments F1 and B.
3. See responses to Common Comments D1 and D2.

Incomplete statement of costs include:

4 { 1. Scenic beauty and outdoor activities are a key value in Montana’s economy. There can be serious adverse economic impacts on tourism from: 75 huge new and expanded 300 foot long turnouts along scenic roads and rivers in Western Montana, seeing monster industrial rigs parked along these popular scenic areas during the day as a result of weather, accidents or traffic, travel delay, visual impact of changing overhead electric and other cables in 572 locations, overhead sign changes and road widening. Having to wait to meet or pass massive rigs, perhaps several times in a days because of slow and delayed travel of big rigs will discourage travelers.

5 { Trailer return on the Interstate will give us 156 trailer rigs 16’ wide and 210’ long and another 44 only 10’ wide. To tourists and residents we will appear to be the LOST BEST PLACE. Will AAA warn people nation wide of this traffic. I would think they will.

6 { 2. Costs to taxpayers of snow plowing of 75 new and more existing turnouts during the hauling season and ever after once built, cost to manage the project and unknown repair cost to roads and bridges as a result of the heavy loads. There are 217 bridges on the route. Even 5 MPH travel on bridges can give total bridge loading of 167 tons.

Incomplete understanding of environmental and other impacts include:

7 { Visual beauty forever lost resulting from the huge turnouts, potential environmental damage from accidents in the scenic corridors and rivers of the Lolo, Blackfoot and northern Montana. Unknown environmental damage to the Historic Bonner in the “trimming” of the trees in this picturesque town. Public safety concerns in the event of domestic and forest fires and ambulance traffic.

8 { There is only a one time economic payoff in the above work and related short time hiring. The impact on tourism income could extend for years and be fatally affected by continued use of the developed “Big Rig” route from the port of Lewiston, Idaho. We cannot comment on the impacts of the Lochsa scenic river route but, we should be ashamed to be a party to the degradation and potential for destruction of this beautiful area.

9 { Imperial Oil, mostly owned by Exxon says they will pay the cost of changes needed. Like their oil tanker accident in Alaska and BP now in the Gulf of Mexico, no one can ever fully “fix” the results of their accidents or pay for the losses to small and large businesses. The economy of Montana and the reputation of MDT and the state of Montana are at risk if any unforeseen problems result.

4. See response to Common Comment J.

5. See Section 4.3 of the Decision Document regarding the size of return trailers and their route.

6. See response to Common Comment L.

7. See responses to Common Comment J, O, H1 and H2 and Specific Comment C.

8. See response to Common Comment M.

9. See response to Common Comment L.

Take time now to do it right.

Sincerely,

Charles P. Teague, Jr.                      Margaret G. Teague  
 cc: Governor Schweitzer  
       Senator Max Baucus  
       Senator Jon Tester

1 { I stand in "favor" of letting the rigs, and their loads, pass through Montana as proposed.

John Teague  
 Clinton, MT

**TEAGUE, JOHN**

1. Comment noted.

1 { Reject the Kern Module Transportation Project - completely! No "big rig" transportation through Montana!

Gray Thompson  
 315 S. 1st St West  
 Missoula, MT 59801  
[grayto40@gmail.com](mailto:grayto40@gmail.com)

**THOMPSON, GRAY**

1. Comment noted.

1 { As an engineer I am concerned about the damage that could be done to significant portions of our highways by allowing this large of a concentrated load over this surface in the warm season. I am sure that load limits per tire will be met . the problem is that there isn't enough experience with a load with this many tires , this close together in a similar situation and I am afraid of hidden damage that might not show up until later. I would like studies to be produced or done to prove that no harm will be done to our roads. Thank you for this opportunity to comment.

Ken Thornton

**THORNTON, KEN**

1. See response to Common Comment L.

From: Nancy Thornton, P.O. Box 1482, Choteau MT 59422, 406-466-5168, nancetho@montana.com, Teton County MT community historian.

Comment due by May 14, sent via e-mail: mdtcommentskearl@mt.gov

cc: MDT Director Jim Lynch, jilynych@mt.gov  
 cc: Office of Tourism Director Betsy Baumgart, bbaumgart@mt.gov  
 cc: Montana Historical Society Director Richard Sims, RSims@mt.gov  
 cc: Gayle Fisher, executive director of Russell Country, gfisher@bresnan.net

**THORNTON, NANCY**

1 { Because of the proposed Imperial Oil (Kearl Module) transportation project we have an opportunity to create a corridor plan that not only includes turnouts, but could include interpretive signs at those turnouts to provide natural, cultural and historical information.  
 I urge state officials to negotiate with the transportation project coordinators for an additional \$270,000 as a donation to the appropriate state agency to show its gratitude to the citizens of Montana for the yearlong inconveniences that the modules may bring to us, while making it possible to begin a \$7 billion oil sand extraction project in Alberta.  
 Montana has had a long history of placing signs at turnouts.

1. Comment noted.

2 { Robert Fletcher (1885-19172), who began working for the Montana Highway Department in 1928, started the Montana Historic Highway Marker Program.  
 The rustic markers generally are two log uprights with a finished wood beam from which the signboard is suspended. While charming and albeit familiar, these signs are graphically outdated in their mission of providing interpretation to the thousands of residents and visitors who would travel the Kearl corridor.  
 The governor and first lady have said that Montana highways are the hallways to our schools. They began an initiative in 2008 to encourage families to learn about Montana’s unique geological history while traveling the state. Several new roadsigns were the result.  
 The Office of Tourism has begun a program to “Get Lost” in Montana, but the new signs would be beneficial when these folks need to find their way back! Visitors should have an opportunity to stop at interpretive signs constructed at the new Kearl turnouts for each town, (especially Augusta, Choteau, Bynum, Dupuyer, Valier, and Cut Bank,) so that drivers would be provided with a rest area where they could also learn about the history of the town they were visiting.  
 Modern interpretative signs are created with the 3-30-3 rule, allowing the visitor to take in progressively deeper levels of information within three seconds, thirty seconds, or three minutes. The use of short sentences (20 words or fewer) and short paragraphs make reading a panel easy for the visitor. There are three basic qualities of a “good” interpretive panel: attractiveness, brevity, and clarity.  
 I hereby ask Imperial Oil for a \$270,000 donation that would fund a grant program for the communities along the route to apply for one or more signs, as opportunity arises. These signs are estimated to cost \$2,000 to \$3,600, possibly more, per sign.  
 A program would be developed that uses low-profile framing systems for interpretive panels

2. Comment noted.



<p>(positioned at a 30- to 45-degree angle). Angled panels provide an ideal balance of panel visibility by all visitors—including those in wheelchairs—while preserving our highway views.</p> <p>Please note that only 1 percent of the lodging tax revenue goes to the Montana Historical Society for historical sites and signage. (\$158,398)</p> <p>Note also that the Montana Department of Commerce sponsored the creation of the Montana Strategic Plan for Tourism &amp; Recreation 2008-2012, however, the state scenic byways program listed in that plan is “off track” according to the Office of Tourism. Publicity about the Kearl donation might put that program “on track.”</p> <p>Note, finally, that the Wyoming Travel &amp; Tourism receives \$400,000 each biennium to fund signage projects along Wyoming’s highways.</p> <p>The opportunity to solicit a large donation from Imperial Oil to mitigate the inconveniences that are inherent in moving big rigs would go a long way as a goodwill gesture to the people along the Kearl route. The subsequent signage would enhance the required highway infrastructure improvements that the company needs to make. The added amenity would be the foundation for a visual, lasting benefit along the proposed route allowing for an educational, scenic driving experience for motorists and residents alike.</p>	<p>See response on previous page.</p>
<p>Reason #1:</p> <p>1 { - Emergency response delays. While already enroute the module cannot pull over until reaching another turn off which could cause delays for volunteer firemen and emergency responders trying to reach the station; or fire trucks or ambulances reaching their destination. Their answers of keeping them pulled over when they receive the call out is fine, however what if they are already on the move?</p> <p>2 { Reason #2: - Defiling the scenic highway 200 corridor with massive turn outs</p> <p>3 { Reason #3: - Highway 200 turn out at mile 35.2. Obvious potential environmental problems.</p> <p>4 { Reason #4: - Is it written that businesses along the route will be reimbursed for quantitative loss of income should a rig close the highway past their traveling hours due to major mechanical malfunction or accident; causing the entire highway to be closed during major business hours.</p>	<p><b>THURMOND, TRAVIS AND SCHOENDOERFER, KATHY</b></p> <ol style="list-style-type: none"> <li>1. See response to Common Comment H3.</li> <li>2. See response to Common Comment J.</li> <li>3. This turnout is an existing turnout to be paved. It is intended to be used as a clearing turnout not a parking turnout. See Table 26 in the EA and response to Common Comment O.</li> <li>4. This information is incorrect and was not stated in the EA or MTP. See response to Common Comment M.</li> </ol>

<p>5 { Reason #5: - It is written that the state can authorize stoppage of the operation during times of crisis; i.e. major wildfire season when crews and equipment are transported and working 24 hours a day, until such crisis is over?</p> <p>6 { Reason #6: - Other than justifiable repair work, is it written that Imperial/Exxon will repair all roadways after the end of their transports and not just offer up when they deem their fault.</p> <p>7 { Reason #7: - IS IT IN WRITING THAT THIS WILL END IN 2011. WE DO NO WANT HIGHWAY 200 TO BECOME A PERMANENT MAMMOTH RIG TRANSPORTATION CORRIDOR.</p> <p>8 { Reason #6: - On a world wide carbon footprint and environmental scope; this entire Canadian project is just wrong. Does Montana want to be paid off to be accomplices in it?  Please demand an entire Environmental Impact Report.  Better yet, just say no. Not in our back yard.  Thank you for reading, And I hope you really did, Travis Thurmond and Kathy Schoendoerfer Ovando, MT</p>	<p>5. MDT can suspend a 32-J permit if necessary.</p> <p>6. See response to Common Comment L.</p> <p>7. See response to Common Comment K.</p> <p>8. See responses to Common Comments B and E1.</p>
<p>1 { We'd like to comment on the proposed high wide corridor plan proposed for western Montana. We are not sure from the information on your site whether or not the proposed corridor will be used for anything other than the large machinery required for development of the project in Canada. If Exxon or any other company plans to use the roads along Lolo Creek and the Blackfoot River for oil shipment at any point this would set us up for a huge disaster. It would only take one accident to ruin one of these important rivers for many years to come.</p> <p>2 { In any case, the roads in question are going through some of the most scenic areas of the state and important areas for wildlife. We do not feel that it is appropriate for any more truck traffic to be routed through these sensitive areas. We use the road between Missoula and Rogers Pass frequently in my work as biologists in western Montana and have often thought that the current use of this road by large trucks simply as a scenic shortcut (of questionable value other</p>	<p><b>TILLY, FREDERICK AND CATHRYN</b></p> <p>1. See responses to Common Comments K and O.</p> <p>2. See response to Common Comment I.</p>

<p>2 { than to alleviate the boredom of some drivers with their jobs) is entirely inappropriate and should not be allowed. A lot of deer, elk, moose, bears and other wildlife is killed on this winding and treacherous road every year. It is not a safe road to drive and the presence of large trucks makes it worse.</p> <p>3 { We think that Exxon should be required to use the railroad for these shipments if possible. If they must use Montana roads they should use the interstate as much as possible and not be allowed to travel along Lolo Creek or the Blackfoot. The corridor going up from Billings goes through flatter, more open country on roads that are not as heavily traveled and if road transport must be used this seems to be a better alternative combined with use of rail or interstate.</p> <p>4 { We only heard about this proposal today and I'm sure there would be a flood of protest if more people knew about it. We request that the comment period be extended and that more detailed information be made available in a form that is much easier to find on your web site.</p> <p>Thanks for your attention in this matter.</p> <p>Frederick C. and Cathryn R. Tilly</p>	<p>See response on previous page.</p> <p>3. Using the railroad is not possible. See responses to Common Comments D1 and D2.</p> <p>4. See response to Common Comment F1.</p>
<p>Dear Mr. Martin,</p> <p>1 { I request a delay on the decision regarding the Tar Sands Equipment Corridor. This interstate project should have a Federal Environmental Impact Study done because of the scope and the longterm impacts of what is being proposed. Inevitably, projects that are carefully and thoroughly examined BEFORE they proceed have far fewer missed impacts down the road. A Federal Environmental impact review may or may not reveal any problems, but better to find out now than later, especially if damages and costs to the public/state could result from this project. Multiple agency reviews would provide a thoroughness that would provide a broader and more indepth examination of the future impacts.</p> <p>2 { Further, the public does need time to review both the transportation proposal and the range of impacts. This should be a headline topic in every newspaper so people can be informed and not reactive, one way or the other. The hearing and "public comment" process provides an opportunity for a range of information and opinion from the public which can, and often does, provide decision makers, in this case, the Department of Transportation, with information about problems, needs and errors that otherwise might be missed. However, the public needs time to formulate thoughtful feedback to the Department of Transportation. I read the newspaper almost daily, and I knew nothing about this.</p>	<p><b>TRYGSTAD, ELLEN</b></p> <p>1. See the responses to Common Comments A and B.</p> <p>2. See response to Common Comment F1.</p>

Unless the Department of Transportation has reason to deny this project, please postpone a decision so a truly transparent and thorough review, state, federal and public, can make it clear that either there are no problems with this project, or that the problems are too costly, financially, environmentally and socially.

Thank you very much. Sincerely,  
 Ellen Trygstad  
 Bozeman, Montana

May 14, 2010

Dwayne Kailey  
 Tom Martin  
 Montana Department of Transportation  
 PO Box 201001  
 Helena, MT 59620-1001

RE: Kearl Module Transportation Project

Dear Mr. Kailey & Mr. Martin:

Please enter these comments into the public record for purposes of the public input process for the Environmental Assessment for the above referenced project.

I have been driving and recreating along much of the proposed route since moving to Montana in 1981. I have skied most winters at Lolo Pass, gone rock climbing and hiking on lands adjacent to Highway 12 along Lolo Creek many times, enjoyed the feeling of the cool clean water of Lolo Creek running over my toes on many summer days, and swam and boated many, many times in the Blackfoot River. Whenever I visit these areas, the views along the way inspire me and therefore I am deeply connected to the roadway and the surrounding land, water, and landscape. This corridor provides me access to my recreation playground, a source of supreme enjoyment for me, my children and my grandchildren.

1 { First, I am concerned that the comment period is too short. This project is enormous in scope and I would like more time to study it in order to make more informed comments.  
 Please extend the comment period for at least 60 more days.

2 { Secondly, even with what I do know I am concerned that the Environmental Analysis is lacking in depth to be able to clearly assess the no-action alternative, alternative routes, and the impacts of the preferred alternative.

**TUHOLSKE, LILLY**

1. See response to Common Comment F1.

2. Comment noted.

<p>3 { I am concerned about adverse impacts to wildlife on the corridor. I personally have seen a cow moose with twin calves crossing Highway 12 near the old hot springs hotel, early on a summer morning. What will happen to their habitat when the pullouts are constructed, and when the giant rigs disrupt the peaceful habitat with their noise and their air pollution? I personally have seen mountain lion tracks along Lolo Creek. What will happen to these cats and their ability to produce and rear young when their home range is altered? The existing EA is lacking in depth and does not adequately answer these questions.</p>	<p>3. See response to Common Comment I. See Section 3.11 in the EA.</p>
<p>4 { In addition, this proposed high and wide corridor will permanently change in a negative way gorgeous scenic highways and riverways in our state. Highway 12 and Highway 200 are not appropriate for such huge loads. The new turnouts alone will destroy the rural feel of the roadways, the views, and the very nature of the route. The EA doesn't begin to assess how people like me will be affected when our recreation routes are permanently altered.</p>	<p>4. See response to Common Comment J</p>
<p>5 { Tourism is a major industry for Montana, particularly the western part of the state. The economic impacts have not been addressed as is evidenced in Table 1, Summary of Effects and Section 6, Economic and Community Impacts. The EA should consider that this road will negatively impact the appeal of the Blackfoot River and Lolo Creek routes as scenic byways that attract many visitors to local businesses. Also, review should look at the impacts of construction delays, accident delays, inconvenience created by the large rigs and impaired access to rivers and trails. It should consider how Montana's outfitters will be affected, too.</p>	<p>5. See response to Common Comment M.</p>
<p>6 { I am deeply concerned about water quality in both Lolo Creek and the Blackfoot River. In particular, the EA has not taken into account the damage to water quality and aquatic life if one of the rigs topples into a waterway. The diesel spill alone from the trucks' engines could wipe out the aquatic life. I am not satisfied either with the assessment in terms of risks to water quality during the construction of new turnouts or modifications of existing ones.</p>	<p>6. See response to Common Comment O.</p>
<p>7 { In addition, air quality along the corridor will be damaged. Even small exposure to diesel pollution is harmful to human health, and all of the residents, visitors and business people who are in the area when the trucks go by will have their health risked. Diesel pollution is associated with increased asthma attacks in children, heart disease and stroke. I think the analysis should consider all human health risks posed by the addition of so many diesel-fueled vehicles to the corridor.</p>	<p>7. Potential air quality impacts are discussed in Section 3.7 of the EA.</p>
<p>8 { I ask for a full Environmental Impact Statement so these and other concerns can be addressed more fully.</p>	<p>8. See response to Common Comment B.</p>

9 { For example, I believe a full EIS should consider the impact of this entire project across state lines and include the Idaho portion of the route. In addition, I believe an EIS should consider the long-term impacts of this high and wide corridor, not solely the 200 or so proposed trips for the first year. That particular portion of the assessment should include the economic impact to road maintenance costs after the first year and over time.

9. See responses to Common Comments B, E2, K, and L.

10 { I ask the state to produce in writing for all the public to see a record of every meeting by any state employee with any federal employee in regard to this project, including Forest Service and Fish and Wildlife Service personnel. We deserve to see who has been involved in the planning and what agreements – formal and informal – have been made.

10. See Section 4.0 of the EA and clarifications in Section 4.5 of the Decision Document.

There are numerous other problems with the EA, including:

11 {  It does not address the potential impacts on delivery of emergency services along the route.

11. See response to Common Comment H3.

12 {  It does not address the undue economic, recreation, safety, and traffic burden Montana residents will bear to support a Canadian oil development by multinational companies. Montanans should not have to pay so that these companies will profit.

12. See responses to Common Comments M, H1, H2, H3, and G.

The EA relies too often on findings of no significant impact, stating that no mitigation is required, when in fact the opposite is true.

13 { I urge the Montana Department of Transportation to require that a full Environmental Impact Statement for the Kearsarge Module Transportation Project be completed prior to any action being taken. The EIS must include a real evaluation of alternatives, unlike the treatment in the current EA, and must address the true public health, environmental, recreation, safety, economic and community impacts of a permanent Industrial High/Wide Haul Corridor.

13. See response to Common Comment B.

Sincerely,

Lilly Tuholske  
1149 Harrison  
Missoula MT 59802

Dear Tom Martin,  
 Please join with us in protecting our future by considering the accumulation of harm to our health and environment that the tar sands project by Imperial Oil of Exxon/Mobile creates.

1 { A project of this size calls for a full environmental impact statement before issuing a permit for transporting the massive equipment through our state. Just an environmental assessment does not cover the pertinent issues of particulates harmful to our health that are released into the air, the loss of old-growth forests in such a dire time, the devastating effects on water quality, and the amount of greenhouse gasses per barrel from the tar sands oil.

Respectfully yours,  
 Jon Turk, PHD

**TURK, JON**

1. See response to Common Comment B.

To Whom It May Concern;

I am a summer resident in the Lolo Valley and do not wish to spend my dollars in any other area.

I am strongly opposed to the use of Hwy 12 to move these oversized loads to Canada. That highway, especially on the Idaho side, is very unforgiving in relation to the novice or even the experienced driver.

1 { As witnessed in the most recent oil slick and the oil platform fire all types of fail safe systems can be created but accidents WILL happen. That narrow two lane(Hwy 12) has very little room to work with after an accident occurs and traffic will be tied up. More so, heavy trucks and cargo WILL go into the river or creeks.

Thank You  
 Steve Turley  
 1426 Palisade Circle  
 Gradnerville, NV  
 89460

**TURLEY, STEVE**

1. See response to Common Comment H1.

Dear Dwayne Kailey,  
 I urge you to say no to creating a corridor of tar sands equipment through Montana. Please conduct an Environmental Impact Statement and specifically:

- 1 {
  - Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 {
  - Require real alternatives to be considered;
- 3 {
  - Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 {
  - Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

**TURRILL, ZOE LYNN**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

Thank you for your time,

**Zoe Lynn Turrill**

1401 Cedar St. #2  
 Missoula, MT 59802  
[ZoeTurrill@gmail.com](mailto:ZoeTurrill@gmail.com)  
 (503) 807-9203

I am writing to you to express my concern for the road system through Montana on Hwy 12 if the MTO should approve the large trucks to haul mining equipment to Canada.

1 { Aside from general concern for the environment of mining impacts, my concern is the impact this may have on Hwy 12. I feel that we need to keep the integrity of the narrow pristine Hwy in tact. I would assume that it would need to be widened and reconstructed and if that is the case I would oppose such changes.

Thank you for taking the time to read my concern.

Bobbie Twite  
 406-544-6153  
[Lnd2sel@montana.com](mailto:Lnd2sel@montana.com)  
 Twite Realty Corp.

**TWITE, BOBBIE**

1. The only modification proposed for Highway 12 is on new turnout and paving parts of seven existing turnouts. No reconstruction or widening on Highway 12 would occur.

Hello again.

1 { Wilbert VanStratten- Three Forks  
 Opposes the move – his concern in the road infrastructure in the Lolo area- weight of the trucks would be hard on the roads and possibly put bridges in jeopardy.

285-0031

**VANSTRATTEN, WILBERT**

1. See response to Common Comment L.

1 { I will remain opposed to the passage of oversize trucks involved in the Kearsarge Project until a comprehensive assessment of all highway safety and emergency response issues is completed satisfactorily. To assume that there are no public safety issues is irresponsible.

/s/ Dr. Richard A. van den Pol  
 5769 Prospect Drive  
 Missoula, MT 59808

**VAN DEN POL, RICHARD**

1. See responses to Common Comments H1, H2, and H3.



<p>1 { Consider all environmental impacts of tar sands development-especially its contribution to global warming before it issues a permit to transport this MASSIVE equipment.</p> <p>2 { Tar sands oil production generates almost triple the global warming pollution as conventional oil production because of the massive amounts of energy needed to extract, upgrade, and refine the oil.</p> <p>3 { Noise, the wildlife fatalities, the threats to water quality, the traffic snarls, the obstructed views, and the inevitable hits to recreation-based, amenity-rich local economies if a proposal from ExxonMobil goes through.</p> <p>Anita Vasquez hairycatsear@bresnan.net</p>	<p><b>VASQUEZ, ANITA</b></p> <ol style="list-style-type: none"> <li>1. See responses to Common Comments E1.</li> <li>2. See response to Common Comment P.</li> <li>3. See responses to Common Comments G, J, O, and M.</li> </ol>
<p>1 { Given that the tar sands operation in northern Alberta, Canada is without a doubt the most destructive, environmentally irresponsible method of oil production yet devised by man, I find it almost impossible to believe that the state of Montana is actually considering to abet this outrageous travesty by allowing humongous loads to be transported through our state on narrow two lane roads for this length of time. Reality check people! Just say NO!</p> <p>Joel Vignere Lakeside, Montana</p>	<p><b>VIGNERE, JOEL</b></p> <ol style="list-style-type: none"> <li>1. See response to Common Comment E1.</li> </ol>
<p>Folks at MDT,</p> <p>1 { It's simple. The big rigs should be allowed if they meet the requirements which now stand in Montana law. How can it be any other way? Mitigate the problems and let them roll. Of course, other agendas have arisen in what George Will recently called the "Culture of Complaint." The ultimate in complaints - the lawsuit - is probably coming down the road. But, I imagine Exxon-Mobil has lawyers smart enough to read Montana law.</p> <p>If it's legal, how can it be stopped?</p> <p>Does anyone remember the Missoula City Council in the early 1980s declaring the city, including I-90, to be a "Nuclear Free Zone." No nuclear waste could travel through, except, of course, the nuclear materials used and nuclear waste created at UM, our hospitals, etc. The complaints today nearly match the hypocrisy of that time.</p> <p>Thanks. Ed Waali Missoula Retired Chemistry Prof</p>	<p><b>WAALI, ED</b></p> <ol style="list-style-type: none"> <li>1. Comment noted.</li> </ol>

Dear MT Dept. of Transportation:

I am quite concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands. Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

The scenic beauty of our state is critical to our quality of life as well as our tourism industry. Please do not move forward on this proposal without seriously considering the potential, grievous impact such a thing could have.

Joni Waldrup  
Missoula

**WALDRUP, JONI**

Form Letter 1

1. See response to Common Comment C2.
2. See responses to Common Comments D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

To Whom it May Concern;

1 { I think that if the big rigs are going to move through Montana they should use Montana based Pilot Cars and that they need to look at the impact on the community. I support the Trucking Industry but I think that Pilot cars out of Montana need the support too. They need to make a living and when Canadian Pilot cars come through they take away jobs from Montana. Canadian companys take up to three years to pay for their pilot cars services and still run through Montana and I think if they were forced to use and pay for Montana Pilot cars that they would learn that Montana takes time to care for the small guy and that if you want to go through our State than you have to give us the business to help our state. If they have to pay for services before crossing the border then alot of montanans would be able to make a good life but as long a canada takes advantage of use then the more montana suffers. Support Montana Jobs PLEASE PLEASE PLEASE.

THANKS

**WALKS, JANEL**

1. A Montana company is under contract to provide traffic control services.

JANEL WALKS  
4064595109

Dear Sirs,

1 { I'd like to add my voice in support of requiring a more thorough EIS to examine the impact of the Kearn large transport project. The current EA that was done is inadequate in several respects, and I question whether the facts submitted by Imperial are accurate, or if there is anything limiting them to the number of loads they claim they are transporting.

2 { Once the corridor is in place, is there anything to limit them to the number of trips they identified? As a friend pointed out: If the Tar Sands are developed as planned, Exxon and other companies will need to ship in equipment for decades. As someone else said, you don't build a railroad and then run just one train over it. Creating such a corridor will have a long-term  
3 { financial, environmental and quality of life impact on the communities, businesses, wildlife and individuals in the corridor. Such effects deserve a full and comprehensive EIS review.

4 { In addition, while they have agreed to pay for all the work necessary to increase the width of the roads for turn-out, etc., is there a commitment to replace/repair the road from the extra wear and tear that these huge loads will entail? The latest section of road that was just finished last year on Hwy. 287 coming into Augusta is already falling apart -- I can't imagine how loads such as they've identified wouldn't completely ruin that road.

I have seen the letter submitted by Zach Winestine, and concur in almost all that he says as well.

Sincerely,  
Sara Walsh  
Latigo & Lace  
Box 345  
Augusta, MT. 59410  
562-3665  
[swalsh@3rivers.net](mailto:swalsh@3rivers.net)  
406-562-3832 (home)  
406-562-3665 (work)

**WALSH, SARA**

1. See response to Common Comment B.
2. See response to Common Comment K
3. See response to Common Comment B.
4. See response to Common Comment L.

1 { Please consider the damage this company is going to do to our land. I hope you plan on denying this company a permit. Other sources of energy are available that do not include taking more land.

Thank you,  
Shelly Warling  
e-mail:[shellywarling@mac.com](mailto:shellywarling@mac.com)

**WARLING, SHELLY**

1. Comment noted.

1 { Please please do NOT allow enormous "Big Rigs" to use any of our Montana roads. The route planned from Idaho along the Lochsa River to and through Missoula to Sweetgrass will destroy the roads as well as a wide swath of surrounding territory physically and esthetically, not to mention the additional damage caused by accidents that will inevitably take place. I have had personal experience with Australian "roadtrains" (giant trucks 150 feet long) while touring archaeological sites in South Australia, which is open, flat terrain. They are horrendous in every way--size, noise, effects on the roadbed and on all smaller vehicles, especially ordinary passenger cars--and are not nearly so high nor so heavy as these Big Rigs. Please do not allow them access to the beautiful backroads of Montana nor to the city streets of Missoula.

**WATSON, PATTY JO**

- 1. See response to Common Comment L.

Thank you for your attention. Pat Watson

Patty Jo Watson

Edward Mallinckrodt Distinguished University Professor, Emerita Department of Anthropology,  
 Washington University, St. Louis, MO  
 Faculty Affiliate, Department of Anthropology, University of Montana  
 Permanent address:  
 2870 Mitten Mountain Road, Missoula, MT 59803  
 Phone: 406-327-0098

1 { I support this project and encourage approval. This project will have little if any impact on the environment and provide current and future jobs in Montana. Please approve this project.

**WEBSTER, JOHN**

- 1. Comment noted.

John Webster  
 Project Manager  
 Pavlik Electric Co. Inc.  
 406-543-8783  
[johnw@qwestoffice.net](mailto:johnw@qwestoffice.net)

Sirs;

1 { Don't let these liberal idiots in Missoula stick their noses into state business. I work for the company that will be building the pullouts for this move. Their twisted politics would take food off my table.

**WEGNER, ROD**

- 1. Comment noted

If a conservative is a vegetarian, he doesn't buy meat.

If a liberal is a vegetarian, he wants all meat banned for everyone.

Start hauling!!

Thanks

Dear MDT committee re the Kearsal Module project:

Please **do not** grant the permit to move these shockingly huge modules through the Lochsa, over Lolo, through Missoula and up the Rocky Mountain Front.

- 1 { Why would Exxon go to all this effort to build a one-time high and wide corridor? They will ask later for further permits, and since the corridor will exist, you will have no reason to say no.
- 2 { It is hard to believe that the gigantic turnouts they must make will have no impact on these narrow river valleys (especially the Lochsa & Blackfoot). Maybe they won't destroy threatened species, but they will change the rivers and the valley shape: they will make it ugly. What tourist will want to travel through a devastated landscape?
- 3 { After reading **today** about how federal regulating agencies forced scientists to say offshore drilling in the Gulf of Mexico would have no serious impacts on the environment, I am skeptical of the abbreviated environmental assessment Exxon is presenting us.
- 4 { Do a full environmental impact assessment, and make sure that no one is suppressing data, or demanding differing outcomes.
- 5 { Exxon makes more money than most countries' GNP. Why should Montana sacrifice its roads to help Exxon make more money?
- 6 { I'm just one citizen in this democracy, and I vote for longer comment time, better environmental assessment, consideration of longtime effects of the project (on tourists, tourism and local economies). In pictures I saw, a bridge was bending under the weight of one of those monstrosities. They will swack back Choteau's lovely trees along its streets—on the grounds that they will eventually grow back. Why should we sacrifice our quality of life for Exxon's profit?
- 7 { Is Exxon paying the state of Montana for this? Is there a bribe we haven't heard about, or is all the "profit" coming from crews helping to wreck the rivers and the scenery and the infrastructure?
- 8 { What if one of these overturns on a tight curve? We are watching the catastrophic destruction of life around the Gulf of Mexico by something that everyone said was so unlikely to happen. Not good enough.

Love Montana. Say NO to the Industrial Corridor while you can.

Sincerely,  
 Lois Welch  
 2321 Wylie Ave  
 Missoula, MT 59802

**WELCH, LOIS**

1. See response to Common Comment K.
2. See responses to Common Comments I and O.
3. Comment noted.
4. See response to Common Comment B.
5. See response to Common Comment L.
6. See responses to Common Comments M and F1.
7. See response to Common Comment L.
8. See responses to Common Comments H1 and H2.

I have been following with interest the permit request submitted to your office from Imperial Oil Co., a subsidiary of Exxon/Mobile, for permission to send up to 200 convoys of oversized trucks carrying tar sands drilling and digging equipment over two-lane highways in Montana destined for the Kearl Oil Sands project in northern Alberta. It's my understanding that Imperial Oil wants to move this enormous equipment through Montana during a year and half-long period beginning in the fall of 2010 and that some of the equipment pieces are as large as 24 feet wide, 30 feet high, and 150 feet long.

1 { From what I have learned, tar sands mining produces irreversible impacts to the environment and public health. It produces more green house gases than conventional oil production by a factor of 3-1; it produces excessive levels of harmful particulates that impair air quality; it requires the clearing of valuable old-growth forests; it severely harms water quality; and worst of all, burning the oil from tar sands mining produces more greenhouse gases per barrel than conventional fuel.

2 { These convoys of trucks and equipment will severely disrupt travel and communities across a wide swath of Montana. How about the damage to the roads themselves?

3 { I strongly urge your office to consider all the devastating cumulative environmental impacts of tar sands development – especially its contribution to global warming. I ask that your office prepare a full environmental impact statement , not just an environmental assessment, before issuing any permit to transport this MASSIVE equipment across the state!

Thank you for your attention to this serious matter.

Cliff Wenzek  
550 West Evers Creek Road  
Whitefish, MT 59937

**WENZEK, CLIFFORD**

1. Comment noted.
2. See responses to Common Comment G and L.
3. See responses to Common Comment E1, P and B.

Voicemail comment received by me today from Janet Whaley

1 { I would like to place a comment regarding the big rigs coming through Montana. As a former flight nurse at Saint Pat's I have real medical concerns, safety concerns with transporting car accident and other types of medical emergency type patients. You know how narrow the two-lane roads are that these vehicles will be travelling on. I really cringe at the thought of the safety issue for those rigs getting in accidents or causing accidents or just transporting medical patients out of areas blocked by those rigs.

Janet Whaley  
875 Pattee Canyon Drive  
Missoula, Montana 59803

**WHALEY, JANET**

1. See response to Common Comment H3.

Dear MT Dept. of Transportation:

I am concerned about the creation of a permanent 'high and wide' industrial corridor along some of Montana's most scenic river ways. It is clear that the proposed industrial route will be used for decades to facilitate the development of the Alberta Oil Tar Sands.

Please:

- 1 { • Conduct a programmatic review for the establishment of this permanent industrial corridor;
- 2 { • Require real alternatives to be considered;
- 3 { • Provide an economic analysis that accurately weighs the impacts to our recreation and tourism industry;
- 4 { • Coordinate with DEQ and the federal permitting agencies to properly analyze the transportation project as a whole under both the Montana and National Policy Acts

Thanks,

- Jill  
 Jill Wiggins  
 Rather than love, than money, than fame, give me truth.  
 - Henry David Thoreau

**WIGGINS, JILL**

Form Letter 1

1. See response to Common Comment C2.
2. See response to Common Comment D1 and D2.
3. See response to Common Comment M.
4. See responses to Common Comment A.

Tom Martin

MDOT

Dear Mr. Martin:

- 1 { I'm writing this email in support of the Kearl Module Transport Project. My belief is that this project has been extensively studied and MDOT should proceed to write the oversize permits. Rocky Mountain Contractors has been on standby for a couple of months to perform many utility moves to accommodate this project. We have over 10,000 ft of directional drilling to complete for about a 1/3 of the project. This will employ several MT workers and we will have to buy at least one additional directional drilling machine from a MT vendor valued at about \$250,00.00. We have also been told we will need to employ 4 to 5 overhead power and telephone crews to move the overhead lines in this section of the project. These crews are normally 4 man crews and are well paid union employees. There are other contractors along the route that will be doing similar utility moves.
- 2 { In closing, I believe that the Kearl Module Transport Project will have little detrimental effect on the highway system and a huge beneficial effect on the economy of Montana. Please grant the oversize permits in a timely manner.

**WILLIAMS, RANDY**

1. Comment noted.
2. Comment noted.

Sincerely,

**Randy Williams**  
**President**  
**Rocky Mountain Contractors, Inc.**  
**3268 Ocean View Drive**  
**Helena, MT 59602**

**406-442-8761 x 101 voice**  
**406-442-8762 fax**  
**406-439-9570 cell**

**WILSON, HARRY**

1 { The big rig project through hwy 200 seems about as ludicrous as the federal Govt allowing offshore rigs not to have a remote shutoff valve.  
 The Blackfoot River is one of the great treasure of our state, and to allow these vehicles to make their way directly next to the river , without the proper EIS, seems as foolish as allowing offshore rigs to be built without a remote shutoff valve.  
 I am certainly a champion of business and money, but we must draw the line when there is a remote chance such a beautiful river and corridor can be damaged.

1. See response to Common Comment B.

Harry Wilson

**WILSON, NANCY**

1 { 1. DOT regulations require the identification of logical termini for a proposed action. The justification for this appears to be political boundaries, which is an insufficient justification for logical termini. The logical termini needs to be clearly defined.  
 2 { 2. While some reasonably foreseeable future actions have been defined, those appear to be confined to future MDT actions. Reasonably foreseeable future actions need to include ALL actions regardless of what agency undertakes them. The timeframe used for the cumulative impact analysis is undefined as is the study area. For these reasons, the cumulative impact analysis done is insufficient to reach a conclusion that significant impacts will not occur.  
 3 { 3. A cumulative impact analysis also requires that both direct and indirect impacts of the proposed action be disclosed. Since it is clear that Tar Sands energy development could not continue but for completion of this proposed action, that energy development must be considered as an indirect effect of the proposed action. For this reason as well, the indirect and cumulative impacts analysis for this project is insufficient to reach a conclusion that significant impacts will not occur.

1. See responses to Common Comment E1, and E2.  
 2. The cumulative effects were analyzed based on activities as defined in 75-1-200(3), MCA. Those activities are described in Section 3.2.of the EA.  
 3. See response to Common Comment E1.



- 4 { 4. The historic property analysis does not discuss whether or not the SHPO or the THPO concurred with the Determination of Effects. Without this information, there is insufficient information to determine whether or not the proper process was followed in compliance with the National Historic Preservation Act or in compliance with Section 4(f) of the DOT Act.
- 5 { 5. There is minimal discussion of the effects of tree trimming on historic properties through the Town of Choteau and adjacent to Bonner Dam and Mine. The analysis needs to address the criteria that resulted in the significance of these properties for inclusion on the National Register. Tree trimming may effect the setting of historic properties. This has not been defined
- 6 { 6. The parks, recreation areas and wildlife refuge section is insufficient to determine whether or not a Section 4(f) use will occur. Utility relocations do not address all potential Section 4(f) properties. This section has insufficient information to determine whether or not any future planned parks or trails would be affected. The minimal information provided about potential effects to access and parking in the vicinity of Section 4(f) properties. There is no discussion of consultation with Officials with Jurisdiction regarding existing or future Section 4(f) properties, and in fact, compliance with Section 4(f) is not even mentioned. Overall, this discussion is insufficient to determine whether or not a Section 4(f) use will occur.
- 7 { 7. Compliance with the Environmental Justice Executive Order is not even mentioned. There are likely to be effects to minority and low income communities due to noise (especially since transportation of the modules will occur at night), air pollution, the possibility of spills and other negative effects.
- 8 { 8. The assessment in the document of potential effects to wetlands does not meet the requirements of the Clean Water Act nor the requirements of the Executive or DOT Order for Protection of Wetlands. There is no functional assessment of wetlands that has been done. Broad statements are made that "the location will be adjusted or mitigation applied to avoid impacts to wetlands" or that "two of the six locations appear to have wetland characteristics and need to be reviewed." Both of these statements indicate that wetland impacts are likely to occur and yet there is a concluding statement that "the proposed project is not expected to affect water resources including wetlands." This assessment is completely insufficient and does not meet the requirements of the FHWA Technical Advisory, the Protection of Wetlands Executive Order nor the Clean Water Act. Full survey and delineation of wetlands, including functional assessment needs to be completed. Then both direct and indirect impacts to wetlands needs to be done. Practicable alternatives to the impacts to wetlands needs to be prepared and documented and mitigation needs to be fully defined and committed to.

- 4. See Section 4.1.1.2 and 4.1.2 of the EA and Sections 4.5 of the Decision Document for information on consultation. Section 4(f) of the DOT Act does not apply to the KMTP.
- 5. See response to Specific Comment C.
- 6. Section 4(f) does not apply.
- 7. Environmental Justice is not a MEPA issue. Executive Order 12898 is a presidential executive order that requires 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 populations and low-income populations. Because MDT is a state rather than federal agency, it is not required to comply with EO12898. That said, MDT does not expect this project to have any disproportionately high and adverse effects on minority populations and low-income populations. Please see the EA and Decision Document for additional impacts discussion.
- 8. See responses to Common Comments I.

In summary, this EA is insufficient to determine the direct, indirect and cumulative impacts of the proposed action. It is insufficient to determine whether or not significant impacts will occur.

Nancy Wilson  
 1402 Phillips  
 Missoula MT 59802  
 406 531 6994

ZACHARY WINESTINE

PO Box 351  
 Augusta, MT 59410  
 (406) 459-1577  
 info2@statesofcontrol.com

May 14, 2010

**WINESTINE, ZACHARY**

Tom Martin  
 MDT Environmental Services Bureau  
 PO Box 201001  
 Helena, MT 59620-1001

Re: Kearn Module Transport Project

Dear Mr. Martin,

Thank you for this opportunity to comment on the Kearn Module Transport Project Environmental Assessment. The EA is insufficient and seriously flawed in a number of respects:

1. Because of its huge scope (two countries, four states), its long-term impacts, and the fact that it will establish a permanent "High/Wide" industrial transport route through Montana, the proposed project demands a full Environmental Impact Statement, not an Environmental Assessment.

Governor Schweitzer is quoted in the May 2nd Missoulian ("Schweitzer: Oilfield transportation project will help Montana economy") as stating that the project "is temporary for 200 loads and nobody's proposed a permanent corridor. That's why it's an (environmental assessment) and not an (environmental impact statement)." However, the EA itself makes clear that the corridor will be permanent:

- Future use of the route by other oversize trucking projects is a "Reasonably Foreseeable Activity" (page 16);
- "MDT believes it is reasonably foreseeable that additional oversized loads [beyond those of the Exxon/Imperial project] would want to use the route" (page 24)
- Following completion of construction, "additional oversized loads may want to use this route" (page 34).
- The highway turnouts and other construction necessary to create the "High/Wide" corridor would provide a "lasting benefit" and have a "long-term beneficial cumulative impact" (page 24).

1. See responses to Common Comments K and B.

- MDT's own "Proposed High and Wide Corridors Briefing" dated June 2009, notes that this proposal is part of a plan "to create permanent 'High/Wide' Corridors through Montana" (page 12).

There can be no doubt that if this project is constructed, it will become the route of choice for oversize transport between the West Coast of the continent and the Alberta Tar Sands developments for decades to come. As the Governor himself stated, such a permanent "High/Wide" corridor requires a full Environmental Impact Statement.

2. The EA fails to take into account the cumulative damage which can be expected to road surfaces, roadbeds and bridges. Beyond the 200 shipments of massive industrial equipment currently planned, hundreds or – more likely – thousands of comparable shipments would occur in the future.

Many of the economic benefits claimed by the EA result from the construction necessary to create the corridor and will occur only once (at the beginning of the project), while many of the costs are long-term and will increase each time the corridor is used.

The EA's sole analysis of damage to roads and bridges occurs on page 22: "On an average daily basis, the module transport and support vehicles would contribute 6 vehicles, including the module, to the overall daily traffic volume for the one year when module hauling would occur. Based on this minimal additional use and Imperial Oil's adherence to MDT weight restrictions, it is expected that the proposed project would result in minimal impact to Montana roadways and bridges."

- Does MDT truly consider the giant module transporter to be just another vehicle? The EA states that the maximum weight of a module will be 334,568 pounds (table 9, page 12), while the accompanying Montana Transportation Plan states that the maximum weight of a module will be 344,000 pounds, and that this does not include the weight of the tractor and trailer (page 5). The tractor and trailer will add approximately 288,450 pounds (Transportation Plan, appendix 7), for a total weight of 632,450 pounds!

- The EA states that Exxon will adhere to "MDT weight restrictions," but what exactly does this mean? Exxon/Imperial is clearly NOT adhering to MDT gross weight restrictions, which is precisely why an overweight permit is needed. Presumably this statement means that Exxon/Imperial will adhere to MDT restrictions on axle weight by using trailers with a huge number of axles. But is there a point at which, regardless of the number of axles over which the load is spread, the total amount of weight placed on a small section of road leads to increased deterioration of both the surface and the roadbed, thereby significantly shortening the time period before major (and expensive) reconstruction work must be done?

2. See responses to Common Comments K and L.

2

- Multiple axles can help reduce the impact of loads on road surfaces, but they are far less effective at reducing load impacts on bridges. Table 24 (page 38) indicates that the proposed route crosses 134 intermittent streams and 83 perennial streams and rivers. What will be the effect of the cumulative stresses on bridges, not just from the 200 loads planned by Exxon/Imperial, but from the hundreds or thousands of loads from future oversize transportation projects? Will bridge structures wear prematurely, requiring Montana taxpayers to foot the bill for hugely expensive (and disruptive) bridge replacement or reconstruction projects?
- The EA contains no discussion of impacts on bridges, except to note that Jeff Ryan, of the Montana Department of Environmental Quality, had expressed a concern "that the loads may be too heavy for some of the bridges and he was afraid that might lead to water pollution or a possible spill" (page 61). The EA does not say what, if anything, was done to address this concern. The EA fails to list the weight bearing specifications of the bridges along the corridor. Furthermore, the most recent County Bridge and Road Capital Improvement Planning and Financing Manual states that nearly 25 percent of the bridges inspected in Montana are "structurally deficient" or "functionally obsolete" (Appendix E). The EA should include an engineering study to determine whether every bridge and stream crossing along the route is capable of withstanding loads of 632,000 pounds.
- The EA states, with no further explanation, that Exxon/Imperial "will pay for any needed repairs to roadways and bridges due to their activities" (page 6). However, who will determine whether damage has occurred, and whether such damage is the result of the giant transporters or some other cause? Will there be thorough before-and-after inspections of all roads and every bridge and stream crossing included in the corridor? Most importantly, the EA does not address the issue of damage from cumulative stresses which might only become apparent after use by several future giant module transportation projects. If a bridge needs replacement or reconstruction after two or more different companies have run their giant transporters over it, will those companies volunteer to pay the costs -- or will there be lengthy litigation to determine responsibility, with Montana taxpayers left holding the bill?

See response above.

3. The EA fails to account for the costs that would result from the KMTP's transforming some of Montana's most treasured scenic highways into an industrial transport route.

- Without providing any analysis, the EA simply assumes this transformation would be an unalloyed good. The only relevant comments appear on page 24: "Turnouts constructed or improved at the expense of Imperial Oil will provide a lasting benefit to the safety and convenience of the traveling public," and "Beneficial impacts from

improved roads created by the KMTP and MDT's construction include additional turnouts and improved highway conditions would be a long-term beneficial cumulative impact on the transportation system." Yet the raised utility lines, swiveling traffic signals, and 75 additional oversized turnouts will provide no benefit whatsoever to the ordinary traveling public. Their ONLY function is to facilitate the transport of grossly over-sized industrial loads.

- The EA completely fails to take into account the various social changes which will be caused by the transport of massive industrial equipment for decades to come, including the potentially significant loss of tourist income.
- The EA states that the total economic costs of the delays caused by the transport of 200 modules will be \$100,000 (page 32). This figure seems both suspiciously round and absurdly low, and no information is provided regarding how it was calculated. No account is taken of the delays which will be caused by future transport projects after the initial 200 loads have been shipped.
- The EA appears to include only the costs associated with delays of commercial traffic; no mention is made of costs associated with delays to residents, tourists, and other non-commercial travelers. Although module transport will take place at night, this will not eliminate such non-commercial delays. On several sections, transport is scheduled to continue until 5:30 AM. This will surely have an impact on some early-morning commuters and those residents who work night hours. Furthermore, it's reasonable to anticipate that the module transports will encounter at least occasional delays and arrive at their designated stopping points later than scheduled, leading to even greater impacts. Finally, while transports will not take place on weekends, they apparently will take place on Friday nights/Saturday mornings. Major portions of the transport route provide access to prime hunting areas; during hunting season Saturday morning delays will significantly impact hunters. Some hunters will doubtless choose to hunt elsewhere, resulting in economic losses for local businesses.

- The EA takes no account of the long-term impacts of constant delays over a period of several decades: for example, no mention is made of the fact that some portion of existing commercial traffic may well switch to alternative routes leading to a loss of income on the part of local motels, restaurants, fueling stations, and other businesses that currently service that traffic.

3. See response to Common Comment M.

4. See response to Common Comment K.

<p>4. The EA fails to account for the costs to the Montana economy of outsourcing industrial jobs from Canada to Korea.</p> <p>The entire purpose of the KTMP is to allow Exxon/Imperial to outsource to Korea the manufacture of industrial equipment destined for the Alberta Tar Sands. If this equipment were manufactured in Canada or the United States, Montana's economy would almost certainly benefit indirectly from the sale of resources, services, and agricultural products to the workers and companies engaged in such manufacture.</p>	<p>5. Comment noted.</p>
<p>5. Perhaps most importantly, the EA completely fails to take into account the economic and environmental costs to Montana of climate change, which development of the Alberta Tar Sands will significantly accelerate.</p> <p>The EA states that "There would be no impacts on parklands, recreation areas, or wildlife or waterfowl refuges from any of the activities associated with the KMTP" (page 21). This is simply false. The Alberta Tar Sands is intimately "associated" with the KMTP project; the sole function of the proposed "High/Wide" corridor is to facilitate development of the Tar Sands.</p> <ul style="list-style-type: none"> <li>• The EA should account for the costs of damage that accelerated global warming due to Tar Sands development will cause to Montana's public lands, including increasingly severe devastation by pine bark beetles and spruce budworm, extended and increasingly severe fire-seasons, etc.</li> <li>• The EA should account for costs of damage which accelerated global warming due to Tar Sands development will cause to Montana's agriculture.</li> </ul> <p>6. The EA fails to show any need whatsoever for this project.</p> <ul style="list-style-type: none"> <li>• There is no need to develop the Alberta Tar Sands, and in fact such development will be harmful to both Montana's environment and economy.</li> <li>• Even if the Tar Sands are developed, there is no need to inflate Exxon/Imperial's profits by outsourcing manufacturing to Korea, outsourcing which can only harm Montana's economy.</li> </ul> <p>7. Even if Exxon/Imperial must outsource jobs to Korea, there is no need (other than to maximize Exxon/Imperial's profits) to route shipments through Montana, since at least one alternative route already exists originating on the Gulf Coast.</p>	<p>6. See responses to Common Comments P and E1.</p> <p>7. See response to Common Comment D1.</p>
<p>In summary, the EA fails to properly account for all the costs that will be associated with the KMTP. Neither the development of the Alberta Tar Sands nor the outsourcing of jobs away from North America is in the best interests of Montanans. The KMTP serves no public interest, and there is no reason that Montanans should be burdened with its impacts. DOT should reject</p>	

this proposal.

Respectfully,



1 { I wish to voice my opposition to allowing Imperial Oil Company to take their huge trucks on Montana Highways. First of all, the trucks will be used to expand the environmental disaster of the Athabasca tar sands, which was well documented in a National Geographic article within the last year. The mines themselves and the water use and pollution in themselves are environmentally destructive. On top of that the energy used to extract the oil makes it the most expensive oil produced on the continent, and the oil itself is heavy and inferior. After the Otter Creek double cross, supporting more environmental degradation would make even more a mockery of the green Democratic sham.

2 { I live close to Arlee and experienced the slowdowns of the last years construction. Despite Imperial's denials you know damn well we will have another summer of tie ups if those trucks are allowed on 93. I doubt that the new road was engineered to carry loads as heavy as those trucks. After the trucks are safe in Canada we in Montana may be stuck with a dangerous, rutted highway.

By allowing the trucks on Montana highways we have nothing to gain and a great deal to lose.

Sincerely,  
 Don Winston  
 6454 Jocko Canyon Road  
 Arlee, MT 59821  
 donwinston31@gmail.com

**WINSTON, DON**

1. See response to Common Comment E1.
2. The portion of Highway 93 included in the route is from Lolo to Interstate 90, not the portion that passes near Arlee that has recently been reconstructed. See response to Common Comment L.

1 { Please give your decision a lot of thought before allowing the tar sands equipment to move through Montana on its way to Canada. It is not a good situation to let this happen. The oil spill in the Gulf should be a huge wake-up call to the continued damage that happens with extractive mining.

Clare Witcomb  
 P. O. Box 1547  
 Red Lodge, Mt 59068-1547  
 Clare Witcomb  
[jazzlover@imt.net](mailto:jazzlover@imt.net)  
 Red Lodge, MT

**WITCOMB, CLARE**

1. Comment noted.

May 14, 2010

Mr. Martin:

1 { It is imperative for us to look at the Kearl Module Transport Project project from beginning to end. Rather than ignoring the numerous and blatant environmental, social, and economic consequences that will arise from this project, MDT has chosen to partially focus on the small portion that will affect our state and our roads. The scope of the Kearl Module Transport Project is not limited to our fine state. The current EA gives little justice to actual impacts that Exxon/Imperial Oil will have on the nation and on the future of global climate change. MDT is obligated to comply with MEPA’s scoping guidelines. As such, should insist that an Environmental Impact Statement be completed and overseen by NEPA.

2 { Because no Environmental Assessment is required in ID or WA, it is difficult to comprehend the impacts that our country will feel from this project. Furthermore, the Environmental Assessment completed in Alberta was recently discovered to contain “fatal legal errors” by the Federal Court of Canada. The EA, written by a corporation that stands to benefit from this project and paid for by Imperial Oil, claims that no “significant social, economic, or environmental effects have been identified....from the project as a whole” (17). However, the EA doesn’t examine the project as a whole, but only looks at impacts within the state of Montana, and almost exclusively at the effects the trucks will have on our roadways.

3 { In the past, MDT has spent millions of taxpayer dollars in road repairs and regulatory enforcement that have been necessitated by overweight loads (for example, in Colstrip). None of these maintenance and planning consequences were discussed in the EA.

4 { This project includes the use of easements on federal lands and on federal highways. In addition, federal stimulus dollars are being used for construction and modification of the Port of Lewiston. The appraisal of environmental effects should be executed on a federal scale and not limited to Montana’s roadways.

5 { The EA does not contain proper mitigation strategies for potential spillage or capsizing of trucks. A number of regular sized tractor-trailer trucks tip over and spill their cargo in both the Lochsa River and Lolo creek annually. In the KMTP EA, mitigation for these instances is reduced to being “reported to appropriate state, federal, and/or tribal authority, and MDT” (20). This means that there not only are no strategies or policies in place to deal with such environmentally and socially dangerous spills, but that the cost will be placed on the tax-payers.

**WOLFE, PRAIRIE**

1. See responses to Common Comments A, B, E1 and E2.
2. See response to Common Comment E1.
3. See response to Common Comment L.
4. See response to Common Comment A.
5. See responses to Common Comments H1 and H2.



6 { The EA that was conducted does not take into account the deforestation and environmental degradation that will occur in Alberta; potential impacts on the protected Lochsa river corridor and its population of endangered salmon, steelhead and bull trout; increased road sediment, sand, and ice that will be introduced into Lolo creek; nor the addition of sulfides, dioxides, or nitrogen oxides that will enter the atmosphere both during extraction and the burning of the bitumen.

7 { The Environmental Assessment claims that the Kearl Project involves “*global* execution strategies” (23) but says nothing about the *global* social, economic, and social effects that this project will produce; these are issues that desperately need to be examined.

8 { It is clear that the EA has failed to examine the true impacts of this project. It is our moral obligation as concerned and informed citizens to insist that the Kearl Module Transportation Project is subject to an Environmental Impact Statement conducted by NEPA due to the large scope of the project that has thus far been ignored.

Thank you for your consideration,

Prairie Wolfe

2020 Middle Burnt Fork Rd.

Stevensville, MT 59870

6. See responses to Common Comment E1 and O.

7. See response to Common Comment E1 and Common Comment E2.

8. See responses to Common Comment A and B.

I'm very concerned about the destructive pollution of our planet.

1 { Please, please prepare a **full environmental impact statement** regarding the tar sands mining planned for a Canadian location north of Shelby, MT.

2 { Also, please register my objection to the massive convoy of trucks and equipment which is scheduled to travel over Montana roads to reach the mining area. Our roads and bridges are already in poor condition, and our budget is tight.

Please do all you can to deny Montana State's cooperation and enablement of this project.

Thank you for considering this request.

M. Sharon Wolfe

307 E. 13th St.

Helena, MT 59601

**WOLFE, SHARON**

1. See responses to Common Comment B and E1.

2. Comment noted.

I am very concerned that we are allowing passage of equipment for a Canadian oil project to pass thru our state along some of the most pristine areas in western MT and ID. Part of the intended route along highway 12 is a wild & scenic corridor with Lolo Creek and the Lochsa River in harms way. Should one of these massive trucks thru speed or driver error go into these waters, there would be a real mess. Even regular sized trucks go into these waters now and it's a cleanup problem. This road does not need to be widened. What a mistake with cliffs that come right down to the highway that would need to be blasted away. This doesn't need to become another super highway for transportation purposes. Don't let this happen. Let Exxon and Canadians figure out transportation routes from BC, not here.

Marilyn Wolff  
 234 Bridle Trl  
 Stevensville MT 59870  
 777-3022

**WOLFF, MARILYN**

1. See responses to Common Comments H1 and H2.
2. Highway 12 would not be widened for the KMTP.

Montana Department of Transportation: To whom it may concern:

I'm writing to encourage you to consider all of the aspects of allowing Imperial Oil to utilize Montana roads to transport their equipment. The tar sands may allow the US to feel less threatend by importing foreign oil, but the cost is prohibitively high. The tar sand mining projects only contribute to global warming by increasing the amount of green house gases produced by each barrel of oil. It destroys the old growth borreal forrest necessary for breeding of up to 3 billion birds. It creates large toxic tailing pits that the CEO of Imperial Oil himself called a challenge (Sally Mock interview on Montana Public Radio). Montana is only too familiar with large toxic pits--look at the Berkley Pit!!

At any rate to irresponsibly allow Imperial Oil to utilize our highways to add to the degregation of our planet is irresponsible. I believe that all of these things should be put into the equation. The small amout of economic development that they promise is small payment for the long term damage they will cause. This doesn't even take into account the damage to roads, the delays, etc. Please consider this wisely!!!

Sincerely, Julie Wood,  
 45 old highway 89  
 Fairfield, Mt (yes they'lll pass through our town!)

**WOOD, JULIE**

1. See responses to Common Comments E1 and P.
2. See response to Common Comment L.

Amy Zanoni  
 622 Rollins  
 Missoula, MT 59801

Tom Martin  
 Montana Department of Transportation  
 2701 Prospect Avenue  
 PO Box 201001  
 Helena, MT 59620-1001

Re: Comments on proposed Kearl Module Transport Project

Mr. Martin,

Some comments:

1 { The Environmental Assessment (EA) of the Kearl Module Transport Project (KMTP) claims that “Additional turnouts would benefit travelers along the route. Visual quality would be improved by the removal of the overhead lines.” As a frequent traveler on this route, I declare that the supposed “benefit” that hidden utility lines touts is wildly outshined by the detriment that the visual pollution three hundred foot wide paved turnouts, every 2.5 miles at some points, along this same route would cause me (3.6.2.7). Further, the assessment states that this project will be “permanently modifying 22 existing highway turnouts,” which significantly understates the extent to which you will be expanding the dimensions of the turnouts. The use of 2,898 loads of gravel and asphalt to cover up land that is regularly navigable for the wildlife in the area is atrocious. Also, it’ll be an eyesore, and almost definitely leave a whole lot more than a ‘negligible’ amount of sediment in the river.

2 { The EA repeatedly lists “slight risks of a vehicle accident involving the construction vehicles occurring that could cause a spill of diesel fuel, hydraulic liquids, or coolant,” and promise in such a case to deal with such an incident using “standard operating procedures.” While this all sounds fine and responsible, the EA fails to acknowledge the increased volume of such vehicles and the resultant increase in the probability of incident.

3 { The EA statement that “Two of the six locations appear to have wetland characteristics and need to be reviewed during the growing season” shows seriously inadequate assessment (3.9.3.3.). Not only has your project not lasted an entire growing season, but you have not yet thoroughly investigated the existence of these wetlands or even gone so far as to delineate the locations of these wetlands.

**ZANONI, AMY**

1. See response to Common Comment J.

2. See Section 3.8 of the EA.

3. See response to Common Comment I.

4 { The Environmental Assessment cites that “Imperial Oil has investigated several transportation routes through Canada and the US,” and that the “only identified feasible route is from the Port of Vancouver, Washington, up the Columbia/Snake River Inland Waterway System f the Port of Lewiston, Idaho. Form the Port of Lewiston, the modules would be transported by specialized load moving equipment through Idaho on US Highway 12 on Lolo Pass. The transport route through Montana begins at the Lolo Pass and follows several highways through Montana before exiting at Sweetgrass, Montana at the US/Canada border.” Considering the admitted scope and expanse of this project, the Environmental Assessment of the Kearl Module Transportation Project performed under MEPA improperly segments the project with a seemingly underhanded intent, i.e., to avoid having to adhere to NEPA. It has been revealed that federal dollars have already been spent making modifications in Idaho that are intended to enable this transport project.

4. See response to Common Comment A.

5 { The Environmental Assessment refuses to think about the project in its entirety. The Montana Department of Transportation uses the excuse that this assessment has to deal only with the impacts that will be had on Montana. While this argument is nothing but valid *legally*, it is inanely limited in its logic, offensively myopic. To have chopped up this corridor in tiny parcels so as to avoid more unified and thorough environmental investigation thereof is deceitful and unethical. The dubiously fragmented view (and logic) of the KMTP parallels another detrimentally limited approach to the thinking that has gone into the assessment of this project: the MDT’s refusal to admit that the underlying (or blatantly obvious to most people) intent to make the corridor that will be used by KMTP into a permanent high and wide corridor through Washington, Idaho, Montana, and Alberta. The EA for this project, therefore, neglects to examine the cumulative, long-term impacts that who-knows-how-many massive truck loads will have on the roads after driving on them for who-knows-how-many-years to come (I imagine major ruts, erosion, sedimentation, things that in the EA were not examined with regard to the long-term). The excuse is often that the EA has to deal only with the issuance of permits to only 200 trucks driven through by Imperial Oil, that there’s been no admission of further loads, and so no assessment of this ‘hypothetical’ is necessary. This excuse, or argument, however, fails to address the fact that whether or not more trucks drive on the roads, the corridor will indeed be established, and the potential long-term impacts that the traffic navigating this corridor must be addressed. The flagrant disregard of the fact that this project is intended to establish a permanent corridor through this route is negligent and offensive. The long-term impact that this project is sure to have on the land in question must be addressed. Especially because of the exploitation implicit in the idea of coming into a place, treading all over it, leaving it in disrepair, and forcing taxpayers to pay for it. Is it really necessary for an egregiously wealthy oil company to come in and level an unbelievably pristine area, jeopardize the safety of its population while they’re at it, just to save a buck?

5. See the response to Common Comment K.

6 { AND: the Tar Sands in Alberta. I suspect that the fact that NEPA would require Imperial Oil to assess the contributions the project is making to climate change has something to do with the company’s approach to all this. The effects global warming will cause on Montana and Montanans – to which the tar sands are contributing in an impressive way – are imminent and substantial. Even an EA as limited as the one in question should have addressed these secondary, eventual impacts. The beetles that no longer get killed off in winter because it’s too warm are already ruining the forests. I can’t go sailing where I’d like to this weekend because the water’s too low. And these are just the tangible effects. It would be embarrassing to willingly be complicit in committing the atrocity in Alberta that is being allowed to happen by corporations and governments alike.

7 { MEPA states that “the agency shall complete a meaningful no-action alternative analysis. The no-action alternative analysis must include the projected beneficial and adverse environmental, social, and economic impact of the project’s noncompletion.” I believe that the Environmental Assessment of this project has failed. It is inadequate, misguided, and purposely non-specific and reductive. There absolutely *must* be a more thorough investigation of the potential adverse impacts of the KMPT will have on Montana and the other areas the project in its entirety involves. There must be an Environmental Impact Statement performed under NEPA.

9 { Further, the comment period allotted for this is EA was far too short. The document that the public has the opportunity to review and assess is extensive. It is simply unreasonable to expect that any working individual would have the time needed to read, examine, and analyze a one hundred eighty page document in thirty days. Please extend it, *especially* because in the past few days there have been numerous accounts of people’s comments being rejected due to full inboxes. I read about it in the Missoulian today.

Sincerely,  
Amy Zanoni

6. See the responses to Common Comments A, E1, and P.

7. The EA discloses the effects of the No Action Alternative under each resource.

8. See response to Common Comment A and B.

9. See the response to Common Comment F1 and F2.

**ZENTGRAF, JEANETTE**

Statement presented by Jeanette Zentgraf at the public hearing on April 29, 2010:

I believe that the 185 page environmental assessment of Imperial Oil/Exxon Mobil's plan has properly addressed the problems for our Montana roads and our citizens. Mitigations have been detailed. Therefore, we should support the plan. I, for one, would like to see Canada's job market improve and to have the U.S. import their oil.

To stop this project because of Global Warming is ridiculous. The UN's IPCC (Inter-governmental Panel on Climate Change) has been discredited, even though Pres. Obama says, "The science is settled." 700 scientists from around the world have expressed doubts about Global Warming, 12 times the number of UNIPCC scientists. 34,000 American Scientists have signed a petition saying there is no convincing scientific evidence that human release of carbon dioxide, methane or other greenhouse gases is causing disruption of the Earth's climate.

Harvard scholar and climate scientist Willie Soon put it best saying, "It's the Sun, stupid." Any warming actually stopped in 1999. The brief warming period we experienced in the past decade was completely natural caused in part by storms on the sun, not CO2 emissions from SUVs. Now that the sun storms have ended, a cooling period has begun."

I believe Tom DeWeese, who has been reporting for more than 15 years that "Global Warming and Climate Change have never been about protecting the environment. It is an excuse used to subvert free markets, industry, private property ownership, local development and our standard of living into a nightmare of control and regulation. The final goal is to impose global government."

*Jeanette Zentgraf*  
 P.O. Box 1116  
 Libe, MT 59847  
 213-3685

1. Comment noted.

Dear Mr. Martin,

1 { i do not want the tar sands trucks to be allowed to pass through missoula. i do not want missoula to become part of a large shipment corridor, i do not want the pollution added to our city, and i do not want any more destruction done beside our beautiful rivers that already have highways next to them. i also don't want to supply the tar sands in alberta, and think missoula has potential to be influential in global warming prevention by refusing to allow this trucking (despite whatever assurances of safety are presented in the EA).

thank you,

jessica zimmerman  
914 stoddard st  
missoula, mt 59802

**ZIMMERMAN, JESSICA**

1. Comment noted.

Dear Mr. Dwane Kailey,

1 { I am writing you regarding the plans to use Highway 12 over Lolo Pass and through Missoula as a transportation corridor for extra large/load vehicles as part of Imperial Oil/ExxonMobil's tar sands production. I have many concerns with this plan, especially regarding how it may affect the water quality of adjacent rivers. I worked from 2002-2008 assessing the water quality, riparian health, and fish habitat of lakes and streams in Montana for the Montana Department of Quality and am well-educated on what can impact water quality and how water quality in turn affects environmental and human health. I feel there remain too many outstanding questions to move forward at this point.

2 { I urge you to extend the public comment period so that the community has sufficient time to understand the details of this project.

Thank you.

Marianne Zugel  
321 W. Central Ave. Missoula, MT 59801

**ZUGEL, MARIANNE**

1. See response to Common Comment O.
2. See response to Common Comment F1.

Please help protect the Wild and Scenic Lochsa River!

I moved to Montana 7 years ago to escape (temporarily at least), the crowds of Colorado. Montana and Idaho are states that haven't been over-exploited for the purposes and gains of big corporations. This statement was true, up until this spring. Another wild location in our country is under attack by the forces of corporate interest (and not even American, but Canadian!!).

1 { To what benefit are these giant platforms moving through our region. Where do local people gain from their town and highway being exploited? The Lochsa River was one of the first places I got the feeling of being somewhere incredibly special, where the effects of human development had yet to destroy. I can't believe the local governments would individually agree to allowing these monster caravans through a Wild and Scenic River Canyon. What will you say to your grandchildren, when this amazing river corridor is a speedway for semi traffic? Highway 12 is an amazing drive through an incredibly wild river canyon, and I'd really like to see it kept that way.

2 { These caravans will be required to pull over every 15 min. to let traffic go by, but who will monitor and enforce that? Erosion of the banks and an increase in river sedimentation is an obvious consequence of allowing this project to go forward. These giant caravans will block traffic during peak touring/traveling season on this highway. Will that impact the safety of driving this road? The highway department had to create or enlarge many turnouts to accommodate this, before the public comment period was even complete. I heard that we're lucky a public comment period was even allowed, that this project almost went through without even informing the communities that would be impacted. That is absolutely unacceptable, and shows how large an impact this project has potential for, if the powers behind it are trying to be so subversive.

3 { There are obviously other options available to shipping this equipment, and they are being overlooked because they cost too much (monetarily). I would argue that the cost of shipping them through this corridor is too great culturally, as well as naturally.  
Please, do not allow these immense equipment caravans to travel through this amazing river canyon. Do not allow corporate interest to destroy one of the few remaining locations of America's wild west. This place is too special and should be preserved for the enjoyment of many, rather than to be exploited for the gain of a few.

Jake Zywicke  
Bozeman, MT  
406-579-1408  
Montana State University - B.S. Earth Sciences, Snow Science Emphasis  
Montana Whitewater - Manager, River Guide, Kayak Instructor  
Yellowstone Club Ski Patrol

**ZYWICKE, JAKE**

1. See response to Common Comment E2.
  
2. See responses to Common Comments G and F1. The ARM provides for confiscation of permits and/or administrative penalties at 18.8.901 and 18.8.902.
  
3. See responses to Common Comments D1, D2, and D3.



**Table D-1  
NRDC Letter Writers**

Fiamma Aaron	Richard Agee	Michael Allen
Leanne Abbott	Naomi Ages	Yvonne Allen
Patricia Abbott	Stephanie Agnew	Chazz Alley
Ruth Abdella	Victor Ahern	Tuesday Allred
Mary Able	Madhuri Ahluwalia	Charles Almack
Maureen Abrahamson	Karen Ahn	Michael Almond
Gary Abramowicz	Tim Ahrens	Laurie Almoslino
Daniel Abrams	Kirk Aigner	Caroline Alonzo
Rochelle Abrams	Edwin Aiken	Jeff Alper
Yale Abrams	Janet Aird	Nancy Alpers
Karen Absher	Mike Airoidi	James Al-Shamma
Mary Abt	Leor Akabas	Benjamin Alsip
Viviana Acevedo-Bolton	Lorraine Akiba	Timothy Alstrum
Jon Achee	Nancy Alaniz	William Alther
Michael Ackerman	Chad Alber	Arlene Alvarado
Miguel R. Acosta	Evan Albersmeyer	June Alvarez
Joan Adair	Deborah Albert	Bruce Amaro
Jodie Adair	Shan Albert	Hector Amaro
John Adam	Glen Albertson	Mary Amato
David Adams	Kerry Albertson	Patricia Amazorso
David Adams	Debby Alberty	Dean Amel
Hillary Adams	Dennis Albin	Nicole Amelung
John Adams	Denis Alcock	Sheryl Amen
Judi Adams	Jesse Alderman	Sal Amendola
Julie Adams	Stefano Aldighieri	Harold Ames
Julisa Adams	Sharon Aldredge	Nancy Ames
Letitia Adams	Susan Aldredge	Dianna Amick
Martha Adams	Susan Aleman	Eleanor Amidon
Maryellen Adams	David Alexander	Ralph Amodei
Nan Adams	Matthew Alexander	Alexandra Amonette
Patricia Adams	Sharon Alexander	Kindra Amoss
Susanne Adams	Charlotte Alexandre	Carol Ampel
K.V. Adamski	Joseph Alfano	Liz Amsden
Paul Addington	Nancy Alice	Scott Amundson
Valerie Adell	Julianna Alioto	Philip Anacker
Abigail Adelman	David Allara	Kristin Andersen
Barry Adelman	Layne Alleman	Bradley Anderson
Sabrina Adleman	Beverly A. Allen	Carl Anderson
Barry Adler	Caroline Allen	Jeanne Anderson
Deborah Admiral	Craig Allen	Jenny Anderson
Angela M. Affolter	Jim Allen	Jim Anderson
Kathleen Aftab	Marguerite Allen	Karin Michele Anderson

**Table D-1  
NRDC Letter Writers**

Karl Anderson	Brian Armstrong	Emilee June Aweri
Maggie Anderson	Carla Armstrong	Debra Axelrod
Robert Anderson	Dessi Armstrong	Donald Ayer
Roger Anderson	Jonathan Armstrong	Eryl Aynsley
Thomas Anderson	Steve Armstrong	Peter Ayres
Marc Anderson P.E.	Chris Arn	Elizabeth Azevedo
Saliane Anderssen	Carlos Arnaud	Bonnie Azzelino
Robert Andrade	Hazel Arnett	Rebecca B
Brandon Andre	Norman Arnett	Jenny Baarsch
Christie Andreo	Angie Arnold	Christina Babst
Eusebio Andres	David Arnold	Judith Bacchi
Lavona Andrew	John Arnold	Hilary Back
Darla Anelli	Laura Arntz	Phyllis Backer
Kathryn Angell	Nina Aronoff	Mary Bacon
Judith Angelson	Robert Aronson	Randy Bacon
Mary Angle	Tatiana Arsilla	Tommy Bacorn
Maria Angulo	Benet Art	Robert Bader
Mark Anisman	James Arthur	Theresa Badus
Brenda Anna	Georgina Arvay	Kathleen Bagan
Ellen Anon	D Arvelo	Elizabeth Bagby
Sadonya Antebi	Sheila Ary	Kenneth Bagg
Star Anthony Anthony	Elsa Ashelford	Sarah Bagg
Mike Antone	Andrew Asher	Christopher Bail
Armando Antuna-Melendez	Michelle Ashford	Cowen Bailey
Jeffrey Apfelberg	Michelle Ashkin	Helen Bailey
Christina Joanna Angelica	Aaron Ashkinazy	John Bailey
Apostolou	Dwayne Ashmore	Kenneth Bailey
Jim Apple	Penny Ashton	Michael Bailey
Harry Applin	Gail Askew	Jacques and Linda Bailly
Marylucia Arace	Paul Asleson	Nancy Bain
Marybeth Arago	Christine Aspegren	William Bain
Linda Araiza	Julie Asplund	Krystina Bair
Mary Aratounian	Artemis Asproyerakas	Vicky Bair
Daniel Arbiter	Fred William Atchison	Vivian Baith
Alison Archambault	Roger Athey	Allen Baker
Steve Archibald	David Atwell	Aubrey Baker
Elizabeth Archodominion	David Atwood	Chip Baker
Ruben Arcia	Edward Atwood	Christine Baker
Margaret Arden	Christine Auda-Koscs	Ed Baker
Andres Ardila	Marilyn Auer	Mark Baker
John Ardner	Jane August	Pamela Baker
Christina Argyris	Richard Aukerman	Paul Baker
Brooke Arias	Mary Ausborn	Jonathan Bakke
Gene Arias	Carl Austin	Orlando Balbas
Amin Arikat	Carrie Austin	Priscilla Balch
Carole Armen	Jean Austin	Doug Balcom
Joan/Paul Armer	John Austin	Wendy Balder
Angelica Armijo	Charlotte Avolio	Kimberly Baldrige

**Table D-1  
NRDC Letter Writers**

Sylvia Baldwin	Lorraine Barrie	Keith Bedford
Dorlan Bales	Jon Barrilleaux	Kay Bedingfield
Chantelle Ball	Joan Barrios	Maxine Bedyn
Jackie Ballance	Bethany Barry	Susan Beecher
Dave & Tami Ballard	John Bartels	Margaret Beels
Ray Ballweg	Susan Barth	Richard Beery
Patricia Baloyra	Ronald Bartholomew	Keri Behre
James Baltz	Jacqueline Bartley	Robert Behrstock
Susana Bamford	Laura Basili	Brian and Sharon Beinlich
Joan Bancroft	Malcolm Bastron	Jerry Belair
David Band	Gertrude Battaly	David Belford
Anjali Banerjee	Candace Batten	Lea Belgarde
Bhaskar Banerji	Willow Battista	Albert Belknap
Susan Banitt	Brian Battisti	Brenda Bell
Paula Banks	Brian Baublitz	Adam Bell
Albert Banwart	Ernst Bauer	Andrew Bell
Billie Barb	Joanne Bauer	Byron Bell
Tina Barbaro-Polis	Ruth Bauer	Elise Bell
Clayton C. Barbeau MA MFT	S Bauman	Gillian Bell
Kristine Barbieri	Allie Baurer	Norton Bell
Kimberly Barclay	Fred Baurer	William Bell
Michael Bard	Jennifer Baxter	Frank Beltran
Shelley Barden	Amanda Bayer	Jade Belzberg
Cathy Bardwell	Amy Bayless	Aaron Bendele
Bonnie Barfield	Frank Baylin	Herman Bender
Douglas Barile	D. Keith Baynard	Frank Benedetto
Anne Barker	Michael Bayouth	Stacy Benefield
Barney Barker	Gary Bea	Alyce Benevides
Caroline Barker	Holly Bealmear	Glen Benjamin
Pamela Barker	David Bean	Tom Benjamin
Robert Barker	Carol Bearden	Marcia Bennett
Karen Barkman	Donna Beasley	Nancy Bennett
Elisabeth Barnes	Holly Beatie	William Bennett
Pliny Barnes	Ali Beatty	Carolynn Benninghoff
Carl Barnett	Nancy Beaulieu	Alexandra Benson
Claudia Barnett	Lisa Beaupre	Coralie Benton
Melinda Barnett	Paul Bechtel	Danielle Benz
William Barnett	Christy Beck	Al Benzaquen
Ann Barnette	Diane Beck	William Beren
Amanda Barney	Diane Beck	Nick Berezansky
Michele Barney	Mary Beck	Miren Berezibar-Bennett
Linda Barnhart	Erin Becker	Bonnie Berg
Deb Barr	Harold Becker	Edward Berg
Sheila Barrand	Michael Becker	Lyle & Laurie Berg
Susan Barrell	Paul Becker	William Berg
Dave Barrett	Eugene Beckes	Patricia Berger
Diane Barrett	Jonathan Beckett	Terry Bergeron
Jeannine Barrett	Kathleen Beddow	Joan M Bergman

**Table D-1  
NRDC Letter Writers**

Carol Bergquist	Gregory Bish	H. Thomas Blum
Bo Bergstrom	Leslie Bisharat	Lois Blumenthal
Joy Bergstrom	Cori Bishop	Janet Blumer
Timiny Bergstrom	Lauren Bishop	Tami Boardman
Tracie Bergstrom	Norman Bishop	Loretta Boatcher
Steven Berke	Ron Bishop	Sarah Boaz-Shelley
Bonnie Alicia Berkeley	Ted Bishop	Emilie Bobrow
Hilary Berliner	Marianne Bithell	Steven Bochco
Tami Berman	Marylin Bitner	M. Bochner
Charles Bernier	Patricia Bitner	Ron Boddicker
Melissa Bernier	Anita Bixenstine	Patricia Bode
Michael Bernier	Melissa Black	Ruth Bodeman
Joel Bernstein	Michael Black	Linda Bodian
Laura Bernstein	Morrigan Black	Diane Bodine
Lawrence Bernstein	Paul Black	Dan Bodnaruk
Jim Bernthal	Barbara Blackburn	Anita Boehm
Jason Berry	Jason Blackburn	Linda Boginsky
Dwayne Bershaw	Suzanne Blackburn	Larry Bogolub
Sandrine Berthe	Anne Blackford	Laura Bohler
Jean-Claude Berthelot	Rose Blacklidge	Diana Bohn
Emily Bertram	Jean Blackwood	James Boissonnault
Phyllis Berzin	Janet Blair	Diane Bolman
Tina Besaw	Jennifer Blair	Maria Bolton-Joubert
Elaine Besmer	Wendy Blais	Luca Bombelli
Barbara Bess	Larry Blaisdell	Kirsten Bomblies
James Bess	Terri Blakley	Nancy Bomgardner
Lisa Best	Myra Blanc	Bill Bonanno
Judy Bettencourt	Roz Blanch	Jose Ricardo Bondoc
Joanna Bettinger	Eloise Blanchard	Harriet Bonds
Robert Bettinger	Robert Blanchette	Madeleine Bongiorno
Dave Betts	Heather Blancho	Kimberly Bonnell
Heidi Betts	Cricket Blanton	Diana Boom
Warren Betts	Susannah Blanton	Carol Boone
Astrid Bevers	Francis A. Blaschke	Susan Boone
Leighton Bewley	Arran Blattel	Christine P Booth
Rajdeep Bhathal	Jnan Blau	D. A. Booth
Martin Bidney	Ron Blau	James Booth
Karen Bidwell	Lori Blauwet	Janet Booth
Timothy Biel	Gloria Bletter	Richard Booth
Linda Bienenfeld	Ted Blishak	Worth Booth
Amy Biggs	Richard Block	Anna Boranian
Rachel Bignell	Lisa Blocklinger	Gary Boren
Alaina Bihler	Robert Blohme	Karen Borgardt
Gregory Billingham	Claudia Bloom	Brad Borgogno
Peggy Billo	Robert Bloyer	Carol Born
Eric Bindseil	Miriam Bluestone	David Bornstein
Richard Bingham	Dorothy Blum	Harriet Borton
Pat Bird	Gina Blum	Milton Bosch M.D.

**Table D-1  
NRDC Letter Writers**

Boz Boschen	Jack Brandt	Christopher Brown
Eli Boschetto	Beth Braun	Daniel Brown
Gail Bosley	Nola Bredal	Dianne Brown
Rob Boucke	David Breecker	J. Brown
Tami Boudreau	Charmaine Breitengross	Justin Brown
Tonna Bouillion	Fran Breitkopf	Karen Brown
Sylvia Boulware	Inge Bremerman	Lynne Brown
Jessie Bourke	Ralph Bremigan	Marygrace Brown
Gregory Bovee	Jan Brendes	Nancy Brown
Cynthia Bower	Sara Brennan	Renee Brown
Anita Bowers	Terri Brennan	Rodney Brown
Barbara Bowers	Ruth Brenner	Sandra Brown
Joe Bowers	Diane Brenum	Travis Brown
Lou Bowers	Nellie Bretherick	William Brown
Mary Bowie	Richard and Lola Brett	Patricia Browne
Kenneth Bowman	Matt Bretz	Kriag Brownell
Scott Bowman	Peter Breu	Virginia Brownfield
Richard Box	Paul Bridgewater	Jocelyn Broyles
Elsa Boyce	Lois Briggs	Aliaska Brozen
Andrea Boyd	Lesley Brill	Regan Brubaker
Kingsley Boyd	Gina Bringman	Edie Bruce
Lynnette Boyd	Kara L. Brinkman	John Bruckman
Rosalind Boyd	Thomas Brinkmeyer	D'arcy Bruderer
Anna Boyiazis	David Britt	Jacqueline Brum
Cindy Boyle	Todd Britton	Bachi Brunato
Lavonne Boyle	Paul Brizzi	Christopher Brunje
Todd Boyman	Sally Brochu	Philip Brunner
Joanne Bracken	Gretchen Brock	Nancy Bruny
Julie Braden	Zoe Brock	John Brust
Gerald Brader Jr	Margaret Brockmiller	Mary Bryan
Louise Bradford	Mark Brockway	Mary Nell Bryan
Kit Bradley	Ria Brodell	Lenore Bryant
Rebecca Bradley	Michelle Brogden	Sara Brydges
Shirley Bradley	Laura Broh	Sharon Buazard
Thomas Bradley	Earle Brokenshire	Louis Bubala
Timothy Bradley	Nancy Bromfield	Eric Buchanan
Sabine Bradley-Phillips	Carter Brooke	Susan Buchberger
Leslie Bradshaw	Bari Brookman	Pamela Buckley
Maureen Bragdon	John Brooks	Phyllis Buckley
Cheryl Braginsky	John Brophy	Charles Bucknam
Laura Braly	Janice Brose	Carolyn Buckner
Jon Brams	Barbara Brosnan	Brian Budnick
Marian Brancaccio	M Brough	Misty Budz
Will Branch	Linda Brovsky	Colleen Budzien
Jim Brandau	Daniel Brower	Jeffry Buechler
Jo Brandmeyer	Lisa Brown	Faith Bugely
Candy Brandon	Art Brown	Susan Buhler
Leilani Brandon	Beverly Brown	Chet Buhyoff

**Table D-1  
NRDC Letter Writers**

Khoi Bui	Robert Butler	Lee Campbell
Donald Bulitta	Jim Butterfield	Marilyn Campbell
Larry Bulling	Ken Buxton	Oscar Campos
Susan Bullock	Sandra Buzan	Sean Campos
Melissa Bunce	Henry Byers	Jorge Campusano
Dana Burch	Barbara Byrd	Suzanne Canja
Kristin Burch	Cynthia Byrd	Demetra Canning
Don J. Burgard	Cynthia Byrd	Ian Cannon
Matt Burgess	Margaret Byrne	Jeff Cannon
Sara Burgess	Lydia Byron	Lorna Cannon
Bonnie Margay Burke	Jas C	Bill Capasso
Colleen Burke	Carla Caccia	Jennifer Caplan
Gene Burke	Jean Cacioppo	Leslie Caplan
Julie A Burke	Megan Cagle	Cathy Cappel
Kathleen Burkett	Erin Cain	Regina Cappelletti
Alton G. & Erika C. Burkhalter	Joseph Calandra	Renee Caputo
Jeanette Burkhardt	Nicole Calasich	Christiane Carberry
Robin Burkhardt	Diane Calder	Kitty Cardaci
Ellen Burkowski	Christian Calderon	Lynn Cardiff
Bruce D Burleigh	Ben Calderone	Dade Cariaga
Joseph Burman	Bill Caldwell	Paige Carlin
John Burnaby	Kathleen Caldwell	Paul Carlsen
Betsy Burnell	Sarah Caldwell	Al Carlson
Bruce Burness	Brian Callahan	Dick Carlson
Greg Burnet	Dr Callahan	Judith Carlson
Deborah Burnett	Loretta Callahan	Krista Carlson
Bob Burns	Dona Calles	Margaret Carlson
Kit Burns	James Callner	Richard Carlson
Mary Beth Burns	Mary Louise Calo	Matthew Carlstroem
Jeremy Burnside	Sandra Calvano	Emily Carnahan
Rebecca Burrill	Marty Camarillo	Kelly Carnahan
Sylvia G. Burrill	Carolyn Cameron	Rose Carnell
Laura Burrows	Rebekah Caminiti	Marilyn Carney
Richard Burrows	Gail Cammarata	Malcolm Carnwath
Harold Burstyn	Ericka Camp	Mark & Lisa Caron
Laurel Burton	Amber Campana	Anita Carpenter
Marci Burton	Linda Campana	Ken Carpenter
Patricia C. Burton	Alicia Campbell	Jeffrey Carr
Valerie Burtson	Barbara Campbell	Walt Carr
Larry Busby	Barbara Campbell	Barbara Carrera
Kip Bush	Brent Campbell	Carla Carroll
Tara Bush	Christina Campbell	April Carson
Kyle Buss	David Campbell	Chris Carson
Edward Butler	Donna Campbell	Christopher Carson
Jennifer Butler	Dudley and Candace Campbell	Anna and Graydon Carter
Jennifer Butler	Elizabeth Campbell	Pl Carter
Kathi Butler	Gerry Campbell	Barry Cartwright
Rebekah Butler	Joan Campbell	Jim Cartwright

**Table D-1  
NRDC Letter Writers**

Chris Caruso	Kang-Min Chang	Leandro Cifuentes
Juan Carvajal	Suji Chang	Jason Cillo
Leslie Casamento	Stanley Chao	Philip Cimiluca
John & Joan Casey	April Chapin	Michael Cimino
Joyce Casey	Gabrielle Chapin	Claudia Cinta
Constance Casinghino	Alexander Chapman	Henry K Cioczek
Beatrice Casini	Lindsay Chapman	Dale Cisek
Anne Casper	Susan Chapman	Vikki Cita
Jo Ann Casselberry	William Chapman	Caroline Clark
Steven Cassellius	Leah Charter	Dana Clark
Tom and Gayle Casselman	David Chase	Elizabeth Clark
Michael Casson	Mary Chase	Julie Clark
Sammy Castagna	Michael Chase	Kit Clark
Kicab Castaneda-Mendez	Leslie Chavez	Mary Jill Clark
Carlos Castro	Phyllis Chavez	Michelle Clark
Cheryl Catron	Stephan Cheneby	Robbin Clark
Clover Catskill	Jeri Cheraskin	Rolland Clark
Kirsten Caufield	Randy & Polly Cherner	Virginia Feingold Clark
Ed Caughey	Adolph Cherot	Rachelle Clarke
Carol Cavalier	Andy Cheshier	Jeanne Clayton
Rich Cavallaro	Avram Chetron	Prudence Cleary
Jon Cavallero	Armand Chevalier	Patricia Cleckley
Jan Cecil	Garry Chick	Marie Clements
James Celico	Richard Chiger	G. Clemson
Chris Celine	Robin Childers	Lisa Clifton
William Cendak	Mary E Chin	Ramona Clifton
Randy J. Centner	Megan Chin	Wendy Clifton
Janet Cerretani	Eric Chipman	David Cline
Ashley Cerullo	Deb Chirgwin	Melissa Cline
Julian Chachula	Andrea Chisari	Scott Cline
Rochelle Chacon	Evan Choate	Kate Cloud
Lisa Chaddock	Frank Choltco-Devlin	Lonny Cloud
Teo Chadil	Brandon Chouinard	Tony Clunies-Ross
Laura Chamberlain	Alice Chouteau	Catherine Clyde
Richard Chamberlain	Josi Chow	Arthur E. Coates
Robert Chamberlain	Christopher Chrissos	Candace Coates
Scott Chamberlain	M'lou Christ	Kylie Cob
Erika Chamberlin	Brian Christian	Karen Cobble
Ronald Chamberlin	Tia Christiansen	Lee Coble
Claire Chambers	Angela Christman	Caren Cockrell
Phyllis Chambers	Rande Christoferson	Michelle Coduto
Hingman Chan	Bruce W. Christopher	Barbara Coe
Jenny Chan	Nathan Chu	Paula Coelho
Kendra Chan	V Chu	Lisa Coffey
Judith Chance	Janelle Church	Mark Coffey
Carolyn Chandler	Dolores Ciabattoni	Stephen Coffin
Tara Chandler	Christina Cicerchi	Beth Cohen
Bev Chandley	Dori Cifelli	Donald Cohen

**Table D-1  
NRDC Letter Writers**

Edward Cohen	Cathleen Conner	Linda Cosand
Fritz Cohen	Cindi Conners	Shelley Coss
Holly Cohen	Joanna Conrardy	Philip Costa
Howard Cohen	Leah Conroe-Luzius	Edward Costello
Misha Cohen	Claudia Conroy	Laura Costigan
Pamela Cohen	Jim Conroy	Kristin Cothorn Cothorn
Dan Cohn	Keelan Conroy	Katharine Cotrell
Debra Cohn	Taylor Consadine	Sandra Couch
Janet Cohn	Nerine Constant	Danielle Couillet
Michael Cohn	Patti Constantino-Martin	Robin Coulon
Sharilyn Cohn	Kathleen Conway	Lynne Coulson
Michal Coker	Jason Cook	Artelia Court
Tim Coker	Jennifer Crawford Cook	Walter R. Courtenay Jr.
Katie Cokinos	Kaye Cook	John Courtney
Danielle Colburn	Kaylouise Cook	Suzanne Covello
Elizabeth P Colby	Paul Cook	Margaret Cowan
Sandra Cole	Keith and Barbara Cooksey	Stephen Cowan
Stephen Cole	Joan Coombs	Dave Cowell
Terry Cole	Christopher Coon	Janet Cowell
Keith Coleman	Carole Cooper	Lynn Cowell
Tamara Collard	David Cooper	Jane Cowles
Geri Collecchia	Judith Cooper	Glenda Cox
Sharon Collette	Kim Cooper	Heidi Cox
Frank Colletto	Richard Cooper	Louise Cox
Rebecca Collias	Susan Cooper	Phyllis Cragin
Anne Collins	Wendy Cooper	Edward Craig
Barbara Collins	Wendy Cooper	Elizabeth G. Craig
C. Collins	Penelope Cooper-Kelley	Desiree Craig-Ramos
Dennis Collins	Rosemary W Coplan	C. Cramer
Frances Collins	Jeremy Copley	Lynn Crandall
Gary Collins	June Coppinger	Donna Crane
Janet Collins	Heide Catherina Coppotelli	Jeff Crane
John Collins	Patrick Corbett	Sharon Craven
Marti Colpitts	Linda Corbin	Kimberly Crawford
Carrie Colson	Mandy Corder	Dennis Crean Jr.
Rosemary Colson	Denise Cormier	Wilma Creatura
Kimberly Colwell	Kelsey Cormier	Shana Creel
Pat Colyar	Marilyn Cormier	Garry Creiman
Lisa Comfort	Gillian Cornelius	Jill Cresko
Erika Comrie	Virginia Cornwell	Francisco Crespo
Christian Comstock	Fitzhugh Corr	Sol Crespo
Tim Comstock	Frank Corrado	Kim Crickard
Rodney Conatser	Greg Correll	Kevin Crifasi
Connie Conaway	Sylvia Correnti	Mike Criqui
Lyn Conklin	Bethany Cortale	Edward Crist
Jean Conley	Madeleine Cortes	Mark & Karen Criswell
Roy Conli	Sarah Cortes	Cathy Cromell
Barbara Conner	Josh Cortopassi	Jim Cronin



**Table D-1  
NRDC Letter Writers**

Charles Crooks	Pamela Cutrone	Donald Davis
Mary Jane Crooks	Joe Cuviello	Kathy Davis
Leanna Croom	Sandra Cuza	Laurie Davis
Lucy Cross	Brittany D	Marilyn Davis
T. Cross	Catherine D.	Mary Davis
Victoria Cross	Goli Dadedel	P J Davis
Jean Crossley	Charles Dafoe	Robert Davis
John Crotty	Douglas Dagger	Sydney Davis
Christopher Crouse	Joyce Dagley	Teresa Davis
Saundra Crowell	Jill Dahlman	Zelda Davis
Wanda Crowell	Kate Dahmen	Randal Dawkins
Robert Crum	Lisa Dailey	Dale Dawson
Beth Crumbaker	Kabir Daitz	Hilary Dawson
Carol Crupper	Felicia Dale	Peggy Dawson
Jim Crutchfield	Erin D'alessandro	Wynona Dawson
Ana Cruz	Virginia Daley	Robert De Beck
Edward & Kathryn Cruz	Maren Dallmann	Melinda De Casanove
Marian Cruz	John Dalton	Achaessa James De Garibay
Zoe Cruz	Michael D'amore	Gabriel De Gedeon
Lynn Crystal	Ken Damro	Dominic De Joseph
Tim Cubbedge	William Dane	Elizabeth De La Baume
Eloise Cucui	Roger Daniel	Cameron De Leon
Mary Cuellar	John Daniello	Piet De Nennie
Mary Cuevas	Mary Daniels	Carrie Deakin
Frances Culbertson	Deborah Danila	Charles Deakynne
Dale Cullen	Claudia Dannelly	Jeff Deal
Kylie Cullen	Linda D'antonio	Dorothy Dean
Marianne Cullers	Susan D'aoust	Eugene Dean
Patricia Culver	Christopher Darsch	Susan Deane-Miller
Diane Cummings	Dolores Darst	Valerie Dearth
Jill Cunningham	Robert Daugherty	Douglas Deaton
Linda Kay Cunningham	Rodney Daughtrey	Francine Debaridi
Marta Cunningham	Christine Daum	Nicole Deburton
Meissa Cunningham	Robert Davenport	Robert Debusk
Richard Cunningham	Janelle Davidson	Cheryl Decker
Mary Cupp	Kathryn Davidson	Larry Dedionisio
Michael Curley	Kenneth Davidson	Liam Deely
Shelli Currin	Susan Davidson	Darla Deen
Amy Curry	Melissa Davies	Kim Dees
Leann Curry	Jill Davine	Judith Defrancesco
Sheila Curtin	Christopher Davis	Lucy Defranco
J. Curtis	Adam Davis	Linda Degelman
James Curtis	Allan Davis	Joanne D'egidio
Betsy Cushman	Brittany Davis	Peter Dehmer
Nancy Cushwa	Candace Davis	Joan Dejong
Michael Custard	Charles Davis	Paula Dejong
Mary Cutler	Daniel Davis	Lenore Dekoven
Karen Cutright	Debbie J Davis	Dino Delano

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NRDC Letter Writers**

Maris Delano	P. Devine	Merelyn Dolins
Katherine Delanoy	Angela Devlin	Garry Doll
Paul Delapa	John Dewitt	Marlene C. Dollahan
Lynn Delatorre	Dan Deyo	Edward Dombroski
Joan Delauro	Michael Dezort	Susan Dombrow
Robert Deleys	Anne Di Fiore-Will	Michael Domin
Carol Delima	Denise Di Santo	Rodrigo Dominguez
Jennifer Delker	Frank Di Stefano	Del E. Domke
Elizbaeth Dellinger	Georgette Diamos	Mir Domurath
Nancy Delmer	Maria Diaz	Michael Donahue
Chris Deluca	Anthony Diaz-Perez	Nona Donahue
Ann Demarco	Sally Dibble	William Donahue
Susan Demaree	Anna Dibenedetto	Rick and Denise Donaldson
Renee Demartin	Janette Dickerson	William Donaldson
Frances Demillion	Jeanette Dickison	Rosemary Donelan
Anitra Demoney	Christina Dickson	Betsy Donlon
Christina Demoss	Kate Dickson	Bruce Donnell
Sheila Dempsey	Toni Didonato	Denis Donnelly
Erica Denae Ramos	Cathy Diegel	Diana Donnelly
Joseph Denatale	Zachary M. Diem	William Donnelly
Linn Denesti	Deb Dierking	Penny Donnenfeld
Laura Deniz	Michele Dieterich	Adam D'onofrio
Joan Denman	Carol Dietrich	Danielle Donovan
Joyce & Ray Denne	Roxana Dietrich	Sheila Donovan
Annette Dennis	Kerry & Beth Dietz	John Doody
Larry Dennis	Peter Dignan	Christine Doolittle
Elliott & Pam Denniston	Berry Dilley	Barbara Dorame
Michael A. Denovo	Mary Beth Dimijian	Marijean Dornback
Erin Denton	Rose Dinneen	James Dorr Johnson
Jeremy Denton	Lisa D'innocenzo	John Dorsey
Donald Depew	Sandra Dino	Arebella Dorth
Marianne Deritis	Marc Dipaolo	Dick Dorworth
Joy Derner	Jeff Diperna	Lynda Dossey
Erin Derrington	Jonathan Dirrenberger	Ken Doub
Janver Derrington	Steve Disch	Wendy Dougan
Steven Derry	Michelle Diss	James Dougherty
Megan Desantis	Angela Dittmar	Judith Douglas
John Desiderio	Jerry Dixon	Kristin Douglas
Lillian Deslandes	Deanna Dobak	Tammy Douglas
Margie Desormeaux	Maria Dobbs	Kim Doumen
Leila Dethlefsen	Marty Dockendorf	Nicolette Douvris
Eileen Deutsch	Margaret Dodge	Norma Dow
Gita Dev	Sharon Dodge	Jay Dowling
Pamela Dever	Zo K. Dodge	Jean Downing
Kerry Devilbiss	James Doeppers	Charles Downs
Anna Devincenzi	William Doherty	Keely Downs
Don Devine	Elinore Dolan	Eleanor Dowson
Irene Devine	Sabrina Dolan	Irish Doxey

**Table D-1**  
**NRDC Letter Writers**

Kathleen Doy	Toc Dunlap	Alice Eckles
William Dozier	Beth Dunlop	Chari Eckmann
William Drabkin	Alison Dunn	Robert Eckmann
William Dracksdorf	Cynthia Dunn	Tatyana Eckstrand
Angela Drake	Gillian Dunn	Choral Eddie
Kelley Drake	Jennifer Dunn	Jonathan Eden
Linda Drake	Molly Dunn	Ingrid Edstrom
Peggy Drake	Paul Dunn	Brook Edwards
Ron Drake	Anne Dunnigan	Clint Edwards
Scott Drake	Ann Dunning	Dalia Edwards
Marc Draper	Meloney Dunning	Judith Edwards
David Drecktrah	Suzy Dunser	Margaret Edwards
Susan Dressel	Diane Dupuis	Monnie Efross
James Drevescraft	Dalange Dupuy	Lisa Ehle
Jeramie Dreyfuss	Michelle Duran	Heather Ehrlich
Meri Dreyfuss	Joyce Durkin	Victoira Eibner
Diana Dring	David Dutack	Jack Eich
Laura Driscoll	Michael Dutton	Bobbie Eimers
Eric Drissell	Suzanne Dvells	Alissa Eischens
Allan Droyan	Dorcas Dvorak	Linda Eiseman
Anna Drummond	Sandy Dvorsky	Adrienne Eisenberg
William Dryden	Eric Dye	Eric Eisenberg
Hans Du Fosse	Cornelius Dykema	Sarita Eisenstark
Barbara Dubois	Harvey Dym	Leah Eister-Hargrave
Barbara Dubois	Michael Dymmoch	Anne-Lise Ekland
John Dubois	Kari Dyr Dahl	Amal El Bekri
Thaya Dubois	Nick Eades	Jenel El Magid
John Ducey	Rosemary Eads	Nora Elcar
Victoria Duckwoth	Henley Eames	Carol Elder
Emerald Ducoeur	Lee Eames	Frances Elder
Mary Duda	William Earley	David Elfin
David Duhren	Anita Earnest	Nancy Elgin
Jamison Dufour	Joan Earnshaw	Cheryl Elkins
Megan Dugan	Susan Earheart	Wendy Elkins
C. Faye Duggan	Jeri Easler	May Ellam
Eric Duggan	Corey Easley	David Ellenberger
Linda Duggan	Nick Easterling	Susan Ellerman
Bob Duke	Michael Easton	Donna Ellett
Carol Duke	Rick Easton	David Elliot
Tom Duket	Robert Easton	Linda Elliott
Charlie Dulberger	Jill Eberle	Liza Elliott
M Dulin	Linda Eberle	Tom Elliott
Bonnie Duman	Renee Eberle	Greg Ellis
Dana Dumont	Florence Echtman	Jane Ellis
Anne Dunbar	Marlina Eckel	John Ellis
Nancy Dunham	Vicki Eckels	John Ellis
Susan Dunham	Caleb Eckert	John Ellis
David Dunkak	Cindy Eckert	Maria Ellis

**Table D-1  
NRDC Letter Writers**

Maureen Ellis	Marion Erickson	Terrence Fahy
Natalie Ellis	Michael Erickson	Claire Fairchild
Robin Ellis	Helene Eriksen	Mary Eaton Fairfield
Susan Ellis	Anne Erikson	Fred Falk
Brian Ellison	Terry Ermini	Linda Falk
Eugene Ellison	David Ermisch	Rita Falsetto
Diane Elliston	Karen Ernst	Gail Fanarjian
Michael Elliston	Donald Erway	Grif Fariello
Deborah Ellman	Kelle Erwin	Linda Farin
Louanne Ellsion	James Eschenfelder	V. Farmer
Barbara Elness	Barbara Eshbaugh	Anne Farnady
Nadine Elsasser	Jeffrey Eshima	Sara Farneth
Nina Else	Gerald & Sandra Eskin	Kerry Farrell
Maryann Elwell	Aarin Esler	Marie Farren
Gayle Embrey	Joy Esler	Sandra Fass
Lorna Emerich	Truman Esmond	Joyce Faughn
Gerry Emmerich	L. Espino	Lea Faulks
Merlin Emrys	Rhea Esposito	Deborah Faurot
Andrea End	Richard Esposito	Joy Fazzino
Danielle Enderson	Nicholas Esser	Sarah Feather
Sara Endicott-Bialczak	Matilda Essig	Patrick Feder
Mauro Enfield	John Essman	Tsar Fedorsky
Eileen Eng	Carlene Estacion	Craig Feese
Sammye Eng	Jill Estensen	Sandra Feldman
Corey Engfer	Douglas Estes	Tina Feldman
Judy Engh	Elissa Eunice	William Feldman
Peggy England	Cathryn Evans	Christine Fell
Julie Englander	Heidi Evans	John Fenker
Constance Engle	Joe Evans	Ellen Fennel Blythe
Rob Englehardt	Katherine Evans	Janice Fentem
Margrit Englehartson	Leah Evans	Mary Ferguson
Richard Engler	Margaret Evans	Steve Ferguson
Mary Englert	Pam Evans	Mary Ferm
Liz English	Susan Evans	Kristin Fernald
Nancy Enkiri	George Everett	Richard Fernald
James and Cynthia Enlow	Robert Everingham	Francis Fernandez
Kathleen Ennis	Sofia Every	Susan Fernandez
Sean Eno	Richard Evin	Susan Ferrara
F. Entesari	Kai Ewert	Betty Ferrero
Farrell Entesari	Nicholas Exline	Ed Ferrero
William Entrekin	Donald Eyer mann	Donna Ferrier-Johnson
Andrea Epstein	Paul Ezust	Chadd Ferron
Kelly Epstein	Julia Faber	Monica Ferry
Phil Epstein	Keith Fabing	Stephen Ferry
Lynda Ereshan	Kenneth Fabiszak	Chris Fetta
Karen Eriksen	Joseph Fader	Magali Feugier
Josiah Erickson	Charles Fagin	Leslie Feuille
Joyce Erickson	Mary Ellen Fahs	Jamie Feusner

**Table D-1  
NRDC Letter Writers**

Sam Feuss	Harley Flanders	Lynn Fowkes
Tim Ffolliott	Katharine Flebotte	Gregory Fowler
Cynthia Fialka	Gail Fleischaker	Jerry Fowler
Daniel Fidelman	Allison Fleming	Erica Fox
Douglas Field	Eleanor Fleming	Erin Fox
Erica Field	Lynn Fleming	Roger Fox
Henry Field	Tom Fleming	Steve and Judy Fox
Scott Field	Michelle Fleskes	Jessica Frakes
Peter Fields	Glenda Fletcher	Christina France
Jason Filardi	George Flint	Marie France
Michael Filio	Jean Flood	Michele Francesconi
Mike Filip	Ryan Flory	Jennifer Francica
Gregg Filler	Parker Flowers	Kirk Francis
John Finazzo	Branden Floyd	Ian Francisco
Barbara Finch	John Fluetsch	David Frank
Erika Finch-Mccaffrey	Marilyn Flynn	Judith Frank
Greg Findley	Patricia Flynn	Zachary Frank
Tracey Fine	Janell Focht	Bou Frankel
Paul Finker	Bea Foley	Jordana Frankel
Paul Finkler	Catherine Foley	Richard Frankel
Amanda Finlayson	Donald Foley	Sheila Franklin
Susan Finley	Patricia Foley	Glenn Frantz
Todd Firer	Bill Folsom	Donna Fraser
Edwin Firmage	Lynn Folsome	Joan Fratantuono
Zachary First	Thomas Fonda	Peter Fraterdeus
Sara Fisch	Jed Fonner	Lacey Fravel
Bonnie Fischer	Gayle Ford	Erik Freas
Joel Fischer	Lauren Ford	Michael Frechette
Richard Fisel	Bridget Forder	Paula Freedman
Jason Fish	Erika Foreman	Lynett Freeman
Brooke Fisher	Robyn Foresta	Ian Freeman-Lee
Cheryl Fisher	Anne Forestieri	John Freeze
Dianne Fisher	Carol Forman	Paul Freibott
Dianne Fisher	Barbara Forst	Colleen Freidberg
E.J. Fisher	Lorraine Forster	Daniel French
Keith Fisher	Michael Forster	Marian Fricano
Lynne Fisher	Lorraine Forte	Barbara Fried Gilbert
Robert Fisher	Curtis Fortin	Bernard Friedberg
Seeger Fisher	Lorri Forton	Bobbie Friedman
Shauna Fisher	Jason Fosco	Dina Friedman
Judy Fitzgerald	Allen Foster	Joyce Friedman
Kellie Fitzgerald	David Foster	Marc Friedman
Stan Fitzgerald	Evelyn Foster	Trey Friedman
Edward Fitzpatrick	Joyce Foster	Thomas Friedrich
Leon Fitzpatrick	Rebecca Foster	Rick Friesen
Maria Fitzpatrick	Rusty & Sara Foszcz	Nancy Fritz
Judith Flaherty	Ursula Foszcz	Stacey Fritz
Karen Flahie	Bob Fourhman	Bettina Frost

**Table D-1  
NRDC Letter Writers**

Charles Frost	Sue Galler	Donna Gelder
Douglas Frost	Elizabeth Galles	Josh Geller
Linda Frost	Shelley Galloway	Barbara Gellman
Sherry Frost	Christopher Galton	Joseph Gelmis
Stephanie Frost	Jean Galvan	Marshalle Genevieve
John Frumento	Megan W. Gamble	Anneliese Gengel
Sarah Frutig	Jolahna Gamblewood	Merideth Genin
John Fry	Dorothy Gammel	Jesse Gennarelli
Nancy L. Fry	Gia Garbarczyk	Samantha Genske-Condon
Allison Frymoyer	Dennis Garber	Yvonne Gensurowsky
D Fueger	Marc Garber	Frank Gentile
Diana Fuentes	Greta Garbo	Dianne Gentrup
Marissa Fuerst	Amy Garcia	Catherine George
Deanna Fuller	Bridgette Garcia	Eric George
Kate Fuller	James Garcia	Kimberly George
Will Fuller	Mary Garcia	Melissa George
Thomas Fulmer	Paula Garciamoreno	Stacey George
Andrea Fulton	William Gardiner	Mark Geraghty
Kristine Fulton	Ben Gardner	Caitlin Gerard
Piera Fumagalli	Grandison Gardner	Mary Gerber
Brian C. Malk & Nancy H.	Len Gardner	Renate Gerber
Heitel Fund At The San Diego	Linda Garfield	David Gerke
Foundation	Anu Garg	Susan Gerke
Nicholas Funderburg	G John Gargiulo	Michael Gerken
Chad Fuqua	Jeff Garmon	Pete Gerold
Jessie Furman	Richard Garnett	Yolanda Gerritsen
J Furniss	Claudia Garren	Amanda Gerwig
Linda Furst	Bob Garrett	Bob Ghen
Joe Futterer	David Garrett	Lisa Gherardi
Barbara Gabbert	Thomas Garrett	Daniel Gholson
Bryn Gabriel	John Garrison	Nanncy Gianoulis
Shanta Gabriel	Jean Garvey	Julian Giardinelli
Ellen Gachesa	Lydia Garvey	Peter Gibbins
Francisco Gadea	George Garwood	Jeanine Burdine Gibbons
Jane Gage	Sharon Gary	Adrienne Gibbs
Keith Gagomiros	Carlos Garza	Frank Gibbs
Giuliana Gaia	John Gasperoni Ph.D.	William Gibbs
Eve Gaige	Jane Gatenby	Frank Giblin
Susan Gailey	Alan Gates	Andi Gibson
Jennifer Gaines	David W Gates Jr	Bill Gibson
Koren Gaines	Brenda Gaudet	Fred Gibson
Kristianne Gale	Jovan Gauthier	Lee Gibson
Jayne Gall	A. Gearhart	Nancy Giebink
John Gallagher	Sharon Gearhart	Vicki Giere
Karen Gallagher	Annette Geels	Dana Gieringer
Carol Gallant	Leslie Geffen	Ronald Gies
Emil Gallardo	Janice Gega	Cody Gieselman
Mark Gallegos	Jennifer Gehrich	Tobias Giesen

**Table D-1  
NRDC Letter Writers**

Jerry Gift	Patricia Glenn	Marcelo G. Gonzalez
Jan Giguere	Sherry Glenzer-Meyer	Maria Gonzalez
Leticia Gil	Maria Glezos	Yazmin Gonzalez
Gary Gilardi	Dianna Glidden	Nancy Gooch
Cherri Gilbert	Michele Glidewell	Margaret Goodale
Corey Gilbert	Stephen Gliva	Gary Goode
James Gilbert	Mary K. Gloster	Teresa Goode
Dawn Gilcrease	Amanda Glover	Katie Gooder
Nancy Gilkyson	Kendall Goben	Adam Goodman
Jerry Gill	Joe & Shirley Goddard	Arifa Goodman
Leila Gill	Olga and Paul Goddard	Betsy Goodman
Laurie Gilleon	Genevieve Godde	Charlie Goodrich
Tim Giller	Rob Godin	Jyl Goodwell
James Gillespie	Barbara & Bob Godinez	April Goodwin
Marjorie Gillet	Katrina Godshalk	Ariane Goodwin
Julia Gillett	Kim Godwin	Jane Goodwin
Cynthia Gillette-Wenner	Murlin Goeken	R. Goodwin
Anne Gillingham	Paula Goellner	Ray Goodwin
Mark Gillono	David Goetze	Doris Gordon
April Gilman	Charles & Rebecca Goff	James Gordon
Meg Gilman	P. Goff	Jonathan Gordon
Monica Gilman	Paul Goff	Keith Gordon
Barbara Ginsberg	Beth Goffe	Marcia Gordon
Charles Ginsberg	W. Reid Goforth	Penny White Gordon
Samantha Ginsburg	William Goggin	Rick Gordon
Anthony Gioia	Henry Gola	Jean Gore
Deborah Giordano	Helaine Gold	Shelley Gorman
Marilyn Giorgio-Poole	Michael Gold	Cade Gorman
Raymond Gipson	Clarissa Goldberg	Elaine Gorman
David R. Anderson and Phoebe Girard	Deanna Goldberg	Elizabeth Gorman
Brooke Girty	Denise Goldberg	Eugene Gorrin
Jason Gische	Marshall Goldberg	Christopher Gortner
Jennifer Gitschier	Connie Golden	Lisa Gosnell
Laura Giubardo	Scott Golder	Deborah Gottselig
Crista Giuliani	Susan Goldman	Beverlee Goynes
Nicholas Gladd	David Goldsmith	Virginia Grabowski
Shirley Gladish	Gail Goldsmith	Gail Grace
Lynne Glaeske	Arielle Goldstein	Jordonna Grace
Jean Glaser	Freya Goldstein	Carol Gracie
Peter Glasier	Steven Goldstein	Dorothy Graden
Jennifer Glass	Stuart Goldstein	Jo Graf
Roxanne Glass	Nancee Goldwater	Jolie Graf
Susan Glass	Harriet Golombek	Cindy Graff
Nedra Glasser Ph.D.	John Goltz	Kris Graham
Gregory Glazier	John Gomolka	Robert Graham
Laura Gleason	Cynthia Gong	Steven Graham
Diane Gleich	Rick Gonyo	Jill Grams
	Joseph Gonzalez	Michael Grand

**Table D-1  
NRDC Letter Writers**

Jim Grande	Cristina Gridley	Diane Gunn
Paula Grande	Christian Gries	Peter Gunther
Kathy Grandelski	Barbara Griffiffith	Sudheer Guntuka
Elaine Grandoit	James Griffin	Ashish Gupta
Gordon Grant	Nancy Griffin	Vijay Gupta
Paul Grant	Jeanette Griffith	David E Gurarie
Suzanne Grant	Jamin Grigg	Ken Gurley
Katharine B Grantham	Stephanie Grilli	David Gustafson
Catherine Grassi	Gianni Grimaldi	Gaya Gustafson
Ilene Graves	Rebecca Grimaldi	Selma Guthner
Janna Graves	MI Grimaldi-Marvel	Barry Guthrie
Andrew Gray	James Grimes	Elizabeth Guthrie
Glenn M. Gray	Marylynn Grimes	Jake Gutman
Jack Gray	Michael Grimes	Patrick Guy
Les Gray	Carolyn Grimm	Tracy Guzeman
Linda Gray	Mary Grindeland	Elizabeth B. Guzynski
Lorraine C Gray	Scott Grinthal	Mark Gwin
Nathan Gray	Richard Grisel	Liz Gwinn
Pamela Gray	Charles Griswold	Dorothy Gyurko
Samuel Gray	Dan Grodzian	Cynthia Haag
Todd Gray	William Groll	Roger Haase
Brian Graziano	Cork Grones	Mark Habermann
Andrea Greco	Bonnie Grosnick	Peter Habib
Vivien Green	Emily Gross	James Habig
Erik Green	Jacalyn Gross	William Hackenberger
Forrest Green	Nancy Gross	Lisa Hackett
Pamela Green	Emily Grossi	Jeffrey Hackimer
William Green	Ellen Grossman	Sallie Hadley
Oshyan Greene	Daniel Grotewohl	Sarah Hafer
Robert Greene	Sonia Grothe	Hope Haff
Solo Greene	Margaret Grubbs	Amanda Hafner
Spencer Greene	Lisa Gruber	Don Hagedorn
Vaughan Greene	Kimberly Grunden	mily Haggerty
Cynthia Greene Eason	Franz Gruter	Linda Haghgoo
Ellen Greenfield	Nancy Gruzleski	Hap Hagood
Stevan Greenleaf	Vicky Guarracino	Deborah Haithcox
Joanne Greenwald	Anne Guaspari	Jim Hajek
Donna Greenwell	Carol Guasti	Melissa Hajek
Helen Greer	Anthony Guay	Kathleen Halberg
Andrea Grefelt	Ralph Guay	Debra Haley
Bethany Gregg	Allison Guerin	Kimberly Halizak
Jamie Gregor	Ruth Gugliuzza	Mollie Halko
Becky Gregory	Joan Guidotti	John Hall
Chilton Gregory	Robert Guillaume	Kevin Hall
Pete Greider	Claude Guillemard	Lana Hall
A. Josef Greig	Elizabeth Guimarin	Marilyn Hall
Larysa Grenier	Gary Gunder	Marti Hall
Diane Grevelle	Richard Gundlach	Sharon Hall



**Table D-1  
NRDC Letter Writers**

Sharrilynne Hall	Annette Hanson	Joshua Hartke
Teresa Hall	Art Hanson	Elaine Hartley
Victoria Hall	Laurie Hanson	Susan Hartley
Annie Hallatt	Levi Hanson	Roy Hartstein
Sharon Haller	Marta Hansz	Michael Hartweck
William Haller	Ronald Harbeson	Frances Harty
Jesiah Hallford	Alberta Harbutt	Christine Harvey
Dan Halos	Richard Hardack	Paul H. Haskins
David Halpern	Johanna Harding	Kristen Hassell
Joshua Halpern	Gwen Harding-Peets	Jeanne Hassenzahl
David Halsell	Marilyn Hardis	Charles Hassrick
Jane Halsey	Peggy Hardman	Silas Hassrick
Jessica Hamburger	Roland Hardt	Margaret Hastings
Christine Hamel	Ali Haridopolos	Laura Hatfield
James Hamilton	Harvey Harlib	Senchal Hatton
Jayne Hamilton	Sarah Harman	Susan Hatzel
Jack Hamlin	Jennifer Harmon	Marty Haupt
Naomi Hamm	Tasha Harmon	Todd Hauser
Judith Hamman	Valerie & John Harmon	Arthur Hausker
Nina Hammer	Charles Harn	Holly Hauxjeffers
Julianne Hammond	Kathryn Haro	Angela Havens
Kristen Hammond	Rene Harp	Patricia Haverkamp
Stan Hammond	Marilyn Harper	Beth Hawes
Jeri Anne Hampton	Susan Harquail	Shereen Hawkins
Lydia Hampton	Beth Harrington	Whitney Hawks
Stephanie Hancock	Catherine Harrington	Erica Hawley
Lara Hand	Adria Harris	Deborah Hawthorne
Susan Handjian	Carroll Harris	Alan Haxton
Amber Hanes-Miller	Hillary Harris	Mike Hay
Sue Haney	Hugh Harris	Skylar Hayes
Russell Hankins	Jennie Harris	Suzan Hayes
Douglas Hanks	Jennifer Harris	Tim Hayes
Mari Hanley	Kimberly Harris	Michael Haynes
G. Hanlon	Lois Harris	Edgar Hazard
Michael & Fran Hanlon	Pat Harris	Kirsten Hazler
Anni Hanna	Shirley Harris	C. Heaberlin
Barbara Hannelore	Walter Harris	Heather Heady
William Hannisch	Cary Harrison	La Heady
Ruth Hannum	Charles Harrison	Robert Healey
Hitesh Hansalia	Mary Harrison	Patt Healy
Debra Hansen	Neil Harrison	Richard & Eileen Heaning
Edgar Hansen	Norma J F Harrison	Frederick Hearn
Hannah Hansen	Dawn Harrod	Tracy Heart
Judith Hansen	Vernon Harshfield	Richard Heaton
Steve Hansen	S.M. Hart	Alicia Hecht
Susan Hansen	Jan Hart Weihmann	Anita Hechtman
Vicki Hansen	Dennis Hartenstine	Berlin Heck
Aimee Hanson	Peggy Hartford	Dorothy Heck

**Table D-1  
NRDC Letter Writers**

Jon Heck	Samuel Hergenrather	Dwight Hilpman
Frank Hecker	Marcy Hermansader	Schuyler Hilts
Anne Hedberg	Christine Hern	Glenn Himebaugh
Jennifer Hedges	Debra Hernandez	Natasha Hincks
John Hedrick	Jalene Hernandez	David Hinderliter
John Heffernan	Nicholas Hernandez	Virginia Hines
Elizabeth Hegarty	John Herod	Elise Hinger
Irene Heiney	Dennis Herr	Justin Hinkle
Christian Heinold	C. Herrington	Gene & Dorothy Hinman
Bernd Heinrich	Tim Herriott	Howard Hinterthuer
Janice Heisey	Carole Herron	Lucille Hintze
Russell Heitz	Lisl Hershberger	James Hipp
Joel Heizmann	Lynne Hertnon	Carol Hirth
Katy Held	Aimee Hertog	Rick Hiskett
Jeanne Held-Warmkessel	Christine Hertzog	Sheilaa Hite
Michelle Helffrich	Sherry Hesner	Denise Hoban
Phyllis Heller	Marianne Hesse	Ron Hobart
Carol Hellman	Sigrid Heuer	Amos Hobby
Linda Helmar	Steffan Heuer	Jeanna Hodes
Charlee Helms	Andrew Heugel	Christopher Hodge
Susan Helmstetter	Robert Hewson	Elizabeth Hodges
James Helsing	Ben Heymann	Suzanne Hodges
Robert Helvie	David Heyneman	Todd Hoefer
Amy Hemmert	Harriet Heywood	Nicole Hoeksma
Genevieve Henderson	Barbara Hiatt	Pat Hoelter
Hugh Henderson	Elizabeth Hiatt	Jennie Hoenie
Janet Henderson	Ettus Hiatt	Dan Hoeschele
Mae Ann Henderson	Steven Hibshman	Rosemary Hoff
Michael Henderson	Paul Hickenbottom	Ann Hoffenberg
Richard Henderson	Dorothy Hickey	Cindy Hoffer
Lynda Hendrell	Gregory Hickey	Danielle Hoffman
Janet Hendricks	Rita Hickey	Frances Hoffman
Mary Hendry	Ann Hickox	Kaj Hoffman
Ingrid Hengesteg	Leslie Hicks	Kim Hoffman
Heide Hennen	Penni Higgins	Lynn Hoffman
Judith Henningsen	Donald Higgs	Mari Von Hoffmann
Kim Henriksen	Carol High	Frances Hogan
Beth Henry	Martha Hildreth	Noah Hogan
Elizabeth Henry	Virginia Hilker	Harriett Hogle
Erin Henry	Carol Hill	Tauno Hogue
Greg Henry	Denise J Hill	Carol Hoke
Mac Henry	Janine Hill	Ann Holcomb
Chandira Hensey	Joleen Hill	Lonner Holden
Mark Hensley	Mary Hill	Virginia Holden
Nicholas Hentschel	Edward Hillard	Mary Holder
Aile Hepburn	Jenny Hille	Joe Holdner
Tim Herbstrith	Erik Hillestad	Carolyn Holland
Geoffry Hergenrader	Richard Hillix-Di Santo	Fern Holland

**Table D-1  
NRDC Letter Writers**

Jane Holland	Robert Houskeeper	Christopher Hunter
Laura Holland	Lucile Housley	Dianne Hunter
Martha Holland	AE Houston	Hahnah Hunter
Debra Hollander	Tamara Houston	Karen Hunter
Kate Holley	Shannon Hovis	Margie Hunter
Michele Holley	Charles Howe	Robert Hunter
Paula Hollie	Terrie Howe	Stephen Hunts
Karen Holliman	Elizabeth Howell	Travis Hurst
Frank Holloway	Sheri Howell	Sean Hussey
Sage Holloway	Trudi Howell	Robert Hutchings
Frode Holm	David Howenstein	Bryce Hutchinson
Patti Holm	Lynn Howerton	Margaret Hutchinson
Ruth Holm	Eric Howkins	Nick Hutchinson
Lynn Holmes	Mark Hoyer	Stephen Hutchinson
Tara Holmes	Nancy Hubbart	Julian Hutton
Michael Holstrom	Ivan Huber	Francine Hyde
Rhonda Holt	Reinhold Huber	Hilary Hyde
Laura Holtz	Zack Huber	Jeanne Hyde
Sondra Holtz	Karl Hubert	Jinx Hydeman
Sue Holtz	Gary Huckabone	Ruth Hyman
Cynthia Holub	Leslie Hudak	I.B.T. Local 600 Golden Age
Kyndra Homuth	Herbert Hudnut	Retirees Club
Albert Honican	D-B Hudson	Mana Iluna
Irene Hood	Keitha Hudson	Alexander Imich
Kim Hood	Vincent Huening	Cera Impala
William Hooper	Jennifer Huey	Yvonne Imperiale
Jacquelyn Hoover	James Huffendick	Mario Inchiosa Jr.
Mollie Hoover	Sarah Huffner	Debra Ingebretsen
Barbara Hope	Sarah Hugdahl	Jon Ingoldsby
Kaye Hopkins	Beverly Hughes	Carole Ingram
Susan Hopkins	Michele Hughes	Carmen Iniguez
Kevin Hopper	Andr�S Hugo	Corrie Inman
Larry Hopper	Diane Hull	Christos Ioannou
Susan Horlick	Thomas Hull	Stephanie Ireland
Roger Horn	Francisco Hulse	F Irvin
Terry Horowit	Per Hultin	Gary Isaac
Tina Horowitz	Kenneth Humberston	Shannon Isaacs
Michael Horton	Charles Humble	Al Isenberg
Susanna Horton	Richard Humleker	Ann Isolde
Elizabeth Hoskins	Jeff Hummel	Lana Israel
Mark Hotchkiss	Jennifer Humowiecki	Natascha Israel
Jonathan Hotz	Jay Humphrey	Kathleen Iudice
Ida Houby	Christine Humphreys	Robert & Laurie Ivone
Carol Houck	Caleb Hund	Phil Iwanicki
Natalie Houghtaling	Patricia Hung	Robin Iwaniec
Sarah Houghton	Anne Hunnewell	Randy J
Randall House	George Hunt	Tony Jabberwocky
Keith Houser	Ronald C. & Betty Hunt	Roberta Jachym

**Table D-1**  
**NRDC Letter Writers**

Ellen Jacke	Linda Jellison	Arnold Jolles
Aria Jackson	Christopher Jenkins	Diana Jonen
Bruce Jackson	Jean Jenkins	Carrie Jones
Cera Jackson	Susan Jenkins	Cedron Jones
Claire Jackson	Lorrayne Jennings	Cynthia Jones
Hannah Jackson	Roarke Jennings	David Jones
Stephanie Jackson	Susan Jennings	Deborah Jones
Willice Jackson	Carolyn Jensen	Decie Jones
Charles D. Jacobs	Christopher Jensen	Diane Jones
Ellen Jacobs	Jared Jensen	E. Jones
Kathy Jacobs	Jerald Jensen	Greg Jones
Russell Jacobs	Darynne Jessler	Hayward Jones
Shannon Jacobs	Sarah Jessup	Jennifer Jones
Robert Jacobson	Beatriz Jevremovic	Karen Jones
Mia Jacoby	Nanette Jimenez	Karin Jones
Robert Jadin	Pablo Jimenez	Katie Jones
Amy Jaffe	Jeff Jirka	Lila Jones
David Jaffe	Theresa Jodz	Michael Jones
Judith Jaffe	Carter Johann	Stephen Jones
Heidi Jahn	Kathryn Johns	Steve Jones
Heather Jakusz	Veronica Johns	Sylvia Jones
Edna-Kay Jamati	Alonna Johnson	Jacqueline Jones-Ford
Bettie James	Anita Johnson	Sandra Joos
Ellen James	Brad Johnson	Daniel Jordan
Jimmie James	Bryan Johnson	David & Nicola Jordan
Raymond James	Carolyn Johnson	Lynnette Jordan
Rona James	Charles Johnson	Parker Jordan
Russell James	Christopher Johnson	Randy Jordan
Stuart James	Colleen Johnson	Robert Jordan
Gregory Jameson	Denny Johnson	Robin Jordan
Linda Jansen	Douglas Johnson	Elisabeth Jorde
Kathy Janeiro	Earnest Johnson	Jean Jorgensen
Jim Janowicz	Emily Johnson	Janet Joscelyne
Chris Janzen	Gary Johnson	Susan Joseph
Nhelson Jaramillo	Karolina Johnson	Paul Josephs
William Jarcho	Keith Johnson	Joseph Jowdy
Michael Jarosick	Keith Johnson	Greg Joyce
Eden Jarrin	Kim Johnson	Kathi Jozwiak
Maurita Jasper	Robert Johnson	Ross Judd
Wannette Jauregui	Ron Johnson	Tom Judge
PJ Jawish	Ronald Johnson	Peter Judkins
Sylvie Jay-Rayon	Shirley Johnson	Erika Jues
Arthur Jech	Stuart Johnson	Judith Juetten
Jennifer Jedlicka	Todd Johnson	Jon Juhlin
Janet Jeffcoat	Tony Johnson	Cynthia Julian
Katelon Jeffereys	Wendy Johnson	John Julian
Paul Jefferson	Calvin Johnston	Clive Julianus
Kimry Jelen	Philip Johnston	Christiane Jung

**Table D-1  
NRDC Letter Writers**

Jan Justice	Roy D. Kaufman	Donna Kennett
Rob Justin	Kristen Kaun	Abby Kent
Laura Juszak	Steve Kaye	Lucy Kenyon
Charlene Kabcenell	Josh Kaye-Carr	Mark Kenzer
Tim Kadrmas	Janet Kaylo	Faye Keogh
Mark Kafka	Christopher Kearney	Katie Keppinger
Leslie Kahan	Lynn Kearny	Anne Kerby
Nancy Kahn	Barbara Keasling	Wendy Kerfoot
Lawrence P. Kahsen	Cliff Keast	Marilyn Kerr
Melinda Kaiser	S. Keedian	Nancy Kerson
Thomas Kaiser	Chris Keefe	Zeneta Kertis
Stefanie Kaku	Maria Keefe	Matthew Kertman
Jon Kalbfleisch	Helen Keegan	Mary Kerwin
Lonny Kalfus	Gretchen Keehn	Daniel Kesselring
Avshalom Kalichstein	Amy Keeler	Elizabeth Kessler
John Kalle	Dorothy Keeler	Jeff Kessler
Natasha Kaluza	Randy Keener	Marjorie Kessler
John Kamansky	John Keiser	Richard Kestler
Tara Kamath	David Keith	Catherine Key
Chris & Heidi Kane	Joyce Keith	Jennifer Keys
Kathleen Kane	Lauren Kell	Sharon Keys
Eileen Kang	Lori Kelledjian	Siri Sant Khalsa
Patricia Kanter-Kennedy	Ambika Kellems	Lubesq Khazanovich
Joyce Kantoff	Barbara Keller	Brenda Kibby
Barbara Kantola	Joe Keller	Beatrice Kidwell
Sheryl Kantor	Paula Kelley	Joseph Kiefner
Isabelle Kanz	Tico Kelley	Stephen Kiene
Mariko Kaonohi	Pamela Kellogg	Sally Kiepe
David Kaplan	Carol Kelly	Mary Alice Kier
Phil & Susie Kaplan	David Kelly	Steven Kierney
Sheryl Kaplan	Gaye Kelly	Kreg Kiggins
Mike Kappus	James Kelly	Christine Killeen
Glen Kappy	Joel Kelly	S Killoran
Frank Kapuscinski	Lara Kelly	Hyosub Kim
Maria Karafilis	Mike Kelly	Nova Kim
Hipkins Karen	Patricia Kelly	Valerie Kim
Michael Karlovich	Sharon Kelly	Alison Kimball
Jim Karner	Maura Kelsea	Henry Kimbell
Matthew Karns	Celeste Kelsey	Kathleen Kimberling
Patricia Karoue	Robert Kemp	Jan Kimbrough
Timothy Karsten	Kathleen Kempton	Loren Kimmel
Rachel Katcher	Michael Kendall	Charles R. Kimpston
Andrew Katsetos	Jenny Kendler	Alica Kincaid
DC Katten	Debra Kendrew	Peggy Kincaid
Joel Katz	Ann Kennedy	Ted Kincaid
Andrea Katzman	Greg Kennedy	Timothy Kincaid
Jonathan Kaufelt	Holly Kennedy	Barbara King
George B. Kauffman	Debra Kennel	Dennis King

**Table D-1  
NRDC Letter Writers**

John King	Rebecca Knight	Ebba Krarup Krarup
Michael King	Lauren Knochelmann	Eric Krasinski
Nancy King	Jeffrey Knollmiller	Andy Kratter
Sarah King	Sherry Knoppers	Kim Krause
Timothy King	Timothy Knotts	Susan Krause
Glendine Kingsbury	Astara Knowley	Stephen Krauska
Kimmel Kington	Rivko Knox	Miriam Krauss
Kevin Kinkade	Kate Knutson	Joseph E. Kraynik
Graeme Kinsey	Carol Kobza	Kerry L. Krebill
Andrew Kinter	Douglas Koch	Steve Kreider
Karen Kiokemeister	Melanie Kocher	Doris Kreis
Peter Kirby	John Koenig	David Kreitzer
P. Kirikiti	Nina Koepcke	Jessica Krick
Karen Kirk	Elizabeth Koepf	Susan Krick
Susan Kirk	Tanya Koester-Radmann	Diane Krieger
Christopher Kirker	Eugene Kogan	John Krist
Peggie Kirkpatrick	Kurt Kohlmann	Jen Kristel
Rick Kirschner	Moki Kokoris	Laurie Kristensen
Kate Kissingford	Christine Kokrda	Peter Kristensen
Nancy Kissock	Gregg Kolessar	Frank Kroger
Diane Kistner	Kathy Kolodziej	Peg & Joe Krolak
Jon Kjarum	Jordan Konisky	Kathleen Kroll-Simard
Per Kjellson	Rebecca Koo	Kenneth Kron
Erwin Klaas	Burt Kopito	Timothy Krone
Scott Klancke	Tara Korb	Jack Krueger
Kristin Klass	Kim Korinek	Dorothy Kruegerjamet ST
Dianna Klau	Gaby Korn	K Krupinski
Tracey Kleber	Michael Korn	Vicki Kruschwitz
Carl Klein	Suzon Kornblum	Teresa Kruse
Pamela Klein	Sam Kornhauser	Sarah Ksiazek
Phil Klein	Christopher Korody	Marie Kitareff
Vanessa Nixon Klein	Donald Kosak	Michelle Ku
Allison Kleine	Brent and Dana Kose	Victoria Kubal
Cindy Kleinfelter	Greg Koshak	Helga Kubasch
Carrie & Michael Kline	Jessica Koslow	Duane Kubishta
Laura Klipp	Phaedra Kossow-Quinn	Ria Tanz Kubota
Ted Klouzal	Laura Kothavala	Miriam Kuhlen
Rosemary Kluepfel	Kathleen Koviak	Peter and Jackie Kuhn
Jean Kluge	Edmund Kowalski	Rosemarie Kuhn
Jennifer Klugman	Barbara Kozacic	Robert Kuhnert
Debra Knapp	Todd Kozak	Melissa Kulbitsky
Wayne Knapp	Karin Kozie	Jeffrey Kulp
Terri Knauber	Hannah Kozik	Pamela Kunke
Karen L. Knaus	Judy Krach	Brad Kunkel
Delilah Knause	Victor Krag	Christopher Kunkel
Nathan Knecht	Michele Krakowski	Mary Kupferschmid
Kd & Don Kneeburg	Jill Kramer	Mark Kupce
Lenka Kneschke	Merrill Kramer	Anthony Kurland

**Table D-1  
NRDC Letter Writers**

Caroline Kurz	Jane Landis	Julianna Lavin
Edward Kush	Maggie Landis	Ann Lawlor
Eric Kuster	Marisa Landsberg	Debra Lawlor
Josh Kweller	James Lane	Patricia Lawlor
Christine Kwiecinski	Kathy Lane	Alan Lawrence
Ted Kyle	Marion Lane	Diane Lawrence
Carol Kyte	Philip Lane	Jennifer Lawrence
Franklin L.G.	Graham Lang	Anita Lawson
Drena La Pointe-Meyer	Nancy Lang	Limell Lawson
Peter La Rowe	Rosalie Lang	Lorraine Lawson
Luciano L'abate	Timothy Lang	Jeanne Layton
Deborah Labb	Jason Langdon	Nadja Lazansky
Leo Labreche	Debbie Langenfeld	Molly Lazarus
Alejandra Lacase	Nancy Langer	Martino Lazzareschi
Dale Lacognata	Elaine Langlois	Brent Le Drew
Michael Lacombe	Barb Langridge	Abby Leach
Grace Lacques	Denise Lanier	Linda Leach
Paige Lacy	Tom Lankering	Lynda Leach
Lisa Ladd	Tom Lankford	Janice Leafer
Linda Laddin	Kathryn Lanning	Andrew Lear
Hermann Lademann	Nolan Lansdale	John Lear
Penny Ladeur	Marcus Lanskey	Jonathon Leathers
Bret Lafontan	Robert Lantz	David Leavitt
Andrea Lafrance	Doris Lapierre	Edward Leblanc
Michael Lagassey	Jan Lapitz	Christopher Leck
Kay Lagerquist	Marilyn Laporte	Maryann Lecombe
Michael Lahey	Peggy Lara	Isabelle Lecun
Ann Lahola	Marcia Laris	Beverly Ledbetter
Caleb Laieski	Tom Larkin	Laszlo Ledenyi
Barbara Laine	Jennifer Larkins	Nicole Lederer
Mark Lainer	Max Larock	Donald Lederle
Zachary Lake	Robert Laroussa	Deanna Lee
Deborah Lakeman	Sergio Larrauri	Erin Lee
Giulianna Lamanna	Judith Larson	Kathi Lee
Eric Lambart	Keith Larson	Marlies R. Lee
Ron Lambe	Tom/Joan Larson	Zoey Lee
Beverly Lambert	Mark Laser	Clay and Kimberly Leeds
John Lambert	Robert Laser	Juli Leeds
Corbin Lambeth	Lawrence Lasker	Naomi Lee-Hood
Larry Lambeth	Maude Laslie	Rosanne Leeson
Becky Lamphier	Megan Lastarria	Scott B. Leffler
Howard Lampinsein	Carylyn Later	Sandra Lefstad
Karen Lampke	Nina Latimer	Bruce Lehman
Emily Lancaster	Geoffrey Laurence	Margaret Lehmann
Crea Land	Phyllis Laurence	Wendi Lehrer
Marian Landa	Dana Lauritsen	Steven Lehti
Marty Landa	Lenora Lautos	Paul Leib
Roberta Landers	Kirsten Lauzon	Karen Leibowitz

**Table D-1  
NRDC Letter Writers**

D. Leichtling	Donna Lewis	Heidi Linsmayer
Nitza Leichtling	Ellen Lewis	Irmgard Linss
Ingrid Leidinger	John Lewis	Marcia Liotard
Eric Leimkuhler	Karlee Lewis	Dale Lipa
Tracy Leinbaugh	Nancy Lewis	Philip Lipari
Dale Leininger	Nancy Lewis	Thomas Lipkis
David Leithauser	Patrick Lewis	Connie Lipotn
Karla Leithoff	Richard Lewis	Connie Lippert
Clark Leitner	Scott Lewis	Patricia Lippincott
Catherine Lemon	Tacy Lewis	Roger Lippman
Edward Lemon	Victoria Lewis	Diane Liptack
Linda Lemon	Cathy Lewis-Dougherty	Adriane Lisbin
Donna Lenhart	Valerie Lezin	M Alan Lish
Marina Lenney	Jamie Li	James Lisle
Samuel Lenorowitz	Shelle Libberton	Kathy Liss
Meg Lent	Hy Libby	Alan Little
Mary Lentfer	Pamela Liberto	John Little
Amy Leo Barankovich	Laurie Ribble Libove	Michael Little
C Leonard	Mary Lickert	W. Little
Joann Leonard	Jerry Liebermann	Jann Littleton
Lois Leonard	Janet Liessner	Linda Littrell
B. Lerner	Francelia Lieurance	Nora Liu
Helena Leroux	Diane Light	Deborah Livingston
Barbara Lesley	Jeanne Lightcap	Michael Livingston
Jacques Leslie	H.L. Ligon	Kathy Lloyd
Marc Leslie	Nicole Lilak	Terri Lloyd
Laura Lester	Darl Lillie	James Lobdell
Nancy Lester	Susan Lilly	Colleen Lobel
Shauna Lester	Trisha Lim	Loren Loberg
Michael Letendre	Christopher Lima	Lynn Lobree
Joslen Letscher	Karen Linarez	Brian Lochlaer
Susan Letts	Kathy Linch	Susan Lockary
Lisa Leutheuser	Paul Lincoln	Dana Locke
Penny Levee	Diane Lind	Orna Locker
Dane Levens	Sara Lindau	Jennifer Lockett
Donna Leveron	Julie Lindberg	Jesse Lockwood
Edmund C. Levin	Diann Lindell	Werner Loell
Robert Levin	Stewart Lindenberger	Lars Lohan
Joe Levine	Ken Lindsay	Wendy Lohman
Nancy Levis	Nancy Lindsay	Bernadette Lohr
David Levy	Douglas Lindsey	Brent Loken
David Levy	Judith Lindsey	Colleen Lombardi
Elleen Levy	Marsha Lindsey	Anna Lonergan
Ellen Levy	Rachel Lindstrom	Donald John Long
Stacia Lewandowski	Priscilla Lineberry	Kristina Long
Gary Lewin	Tracey Link	Ronald Long
Jo Lewin	William Links	Henry Longmire
Anne Lewis	Douglas & Susan Linney	Terrie Look



**Table D-1  
NRDC Letter Writers**

Richard Loosemore	Sandra Lynn	Barbara Mallam
Marcela Lopes	Michael Lynott	Zachary Mallon
Daniel A Lopez	Amy Lyons	Stephen Mallory
Renata Lopez	Jessie Lytton	Daniel Malloy
Robert Lopez	Andrew M	Maura Malloy
Anne Lorber	Jessica M	Paul Malouf
Eric Lorenz	P M	Kate Malsbury
Lara Lorenz	BC. Macdonald	Don Malvin
Lorraine Lorenzini	Patricia Macewen	Virginia Manczuk
Gloria Lorenzo	Danielle Machotka	Alan Mandel
Lloyd Loring	Kerry Macinnes	Beth Mandelbaum
Michele Lortscher	Anne Mack	Kathleen Mandry-Cohn
Karin Losh	Karen Mack	Lori Mann
Ryk Loske	Rande Mack	Marcia Mann
Michael Loss	Barbara Mackay	Renee Mann
Elizabeth Lotz	Tracey Mackay	Laurie Manners
David Loudenback	Kathy Mackechney	Katherine Manney
Kali Louman	Barbara Mackellar	Gerry Manning
Chris Love	Claudia Mackey	L.L. Manning
Steven Lovelace	Peggy Macki	Rosemarie Manns
Sherri Loveland	Jennifer Macklem	Christina Manos Bocek
Michael Loven	Don Macnair	Rosa Manriquez
Kimberly Lovings	Geoff Macnaughton	Jean Marasigan
Beth Lowe	Kenton Macy	Elizabeth Marcellus
Heather Lowe	Barbara Maddoux	Sherrie Marchi
Kenneth Lowe	Charles Maddox	Christina Marcus
Anne Lowry	Lenore Madeleine	Sybil Marcus
Lyn Lowry	Theory Madison	Kristin Mareska
Joan Loy	George Madrid	Chatelain Margaret
Monica Lu	Gene Madrigal	Ben Margolis
Emily Lubahn	Jessica Magaldi	Bonnie Margolis
Karen Luce	Kim Magallanez	Larry Margolis
Vicki Lucius	Sonja Maglothin	Virginia Mariposa
Meredith Lucks	Tracy Maguire	Gideon Mark
Janis Luedke	Tracy Maguire	Colin Markey
Sandra Lum	Pamela Maher	Oliver Markley
Kirsten Lundell	Anne Mahoney	Lorraine Markoff
Charles Lundquist	Maya Mahrer	Kevin Markowski
Heidi Lustig	Michel Maillard	Stephen Marks
John Lutz	Claudette Main	Mary Ann Maro
Joseph Luxbacher	Judith Mair	Jillian Marohnic
Dennis Lyday	Lily Maisky	Doran Marold
Adam Lynch	Julie Majer	Amber Maron
Brian Lynch	Tracey Major	Michael Marrelli
Susan Lynch	Sylvie Makara	Renata Marroum
Gwen Lyndsong	Deborah Maldonado	Beth Marrus
Patricia Lynk	Tom Malee	Karen Marsack
Peggy Lynn	Richard Malin	Lorie Marsh

**Table D-1  
NRDC Letter Writers**

Edna Marshall	Jean Matthews	James Mccomas
Ilna Marshall	Rebecca Matthews	Richard Mccombs
Jack Preston Marshall	Martha Mattus	Robert Mccombs
Justin Marshall	Liz Maul	John Mcconahy
Kevin Marshall	Elizabeth Mauney	Pepperr Mcconnell
Norma Marshall	Harry Mauney	Emily Mcconnelly
David Marston-Villanueva	Emily Mausner	Gene Mccormick
Maureen Martens	Doug Mavor	Matthew Mccormick
William Martens	Michael Mavrovouniotis	Dan Mccooy
Cynthia Marthaler	Ann May	Linda Mccooy
Allison Martin	Judith May	Jill Mccracken
Anne-Marie Martin	Joseph Mayer	Ron Mccracken
Brad Martin	Ken Mayer	Martin Mccrea
Catherine Martin	Melanie Mayer	Maureen Mccready
Claudine Martin	Sara Mayer	Jan Mccreary
Daniel Martin	Steven Mayes	Carol Mccroskey
David Martin	Ginger Mayfield	Dave Mccue
Donna Martin	Patricia Mayne	Jim McCulloch
Halimah Martin	Troy Mayr	Sylvia Mccune
Kathleen Martin	Sharon Mazer	Carolyn Mcdade
Kathryn Martin	Sandra Mazo-Nix	Jennifer Mcdermott
Nancy Martin	Christy Mazrimas-Ott	Graeme Mcdonald
Pat Martin	Lenny Mazzo	Merwin Mcdonald
Trisha Martin	Paul & Diane Mc Credie	Steve Mcdonald
Darlene Martineau	Jessica Mc Guire	Jill Mcdowell
David Martinez	Marian Mcaleenan	Martha Mceldowney
Rich Martini	Emily Mcalpine	Una Mcenaney
Linda Martinson	Terry Mcananey	Lawrence Mcevoy
Elizabeth Maruska	Nancy Mcarthur	Margie Mcginley
Christy Marx	Carole Mcauliffe	Donlon Mcgovern
David Marx	Alison Mcbride	Kevin Mcgowan
Michael Masley	Tina Mcbride	Margaret Mcgowan
Jennifer Mason	Julie Mccahan	Robert Mcgowan
Sandra Mason	Debbie Mccall	Courtney Mcgrale
Matthew Massagli	Moody Mccall	Diane Mcgrath
Meg Massaro	Kathleen Mccarter	Kathy Mcgrogan
Jenifer MASSEY	Bebe Mccarthy	Noel Mchugh
James Mast	Glenda Mccarthy	Rebecca Mcinteer
Stephen Matera	Sandra Mccarthy	Malva Mcintosh
Armond Matevosian	Shirley Mccarthy	Alison Mcintyre
Julie Matewicz	Judy Mccauley	Carynne Mciver
Alex Mathai	Ingrid Mcclellan	Robert Mcivor
Vicki Matheny	Maureen Mcclellan	Julie Mckee
Elizabeth Matinez	Robert Mcclelland	Roger Mckee
Stephen Matlak	B Mcclintock	Jon Mckenzie
Rocco Matra	Liam Mcclintock	Lucy Mckenzie
Steve Matson	Judy Mcclung	Craig Mckerley
Margaret Matter	Karen Mccluskey	James Mckinney

**Table D-1  
NRDC Letter Writers**

Susan Mckinney	B. Medders	Felice Meyer
John Mckinnon	Angela Medley	Jacqueline Meyer
Karen Mckinnon	Patricia Medvick	Jason Meyer
Stanley Mcknight	Betty Meek	Jenny Meyer
Camela McLaren	Mark Meeks	Robert G. & Michelle W. Meyer
Amy Mclaughlin	Linn Cary Mehta	Tanya Meyer
Bernadette Mclaughlin	Greg Meier	Ann Meyette
Tom Mclaughlin	Andres Mejides	Marcia Miceli
Bob Mclean	Jocelyn Melechinsky	Jeannie Michael
Sarah Mclean	Thomas Mellem	Christopher Michaels
Charles M Mclean Jr	Virginia Mellen	Lindsay Michaelson
Dianna McLellan	Eliza Mellen-Smith	Wayne Michaud
Barbara McLendon	Peter Mellini	James Michel
Alexandra McLennan	Mitch Mellman	Reid Mickelsen
Gwen McMahan	Eileen Mello	Evelyn Mickevicius
Pam McMahan	Bruce Mellon	Frank Mickowski
Deborah Mcmanus	Nancy Mellon	Sarah Middeleer
Nancy Mcmenemy	Michele Melonas	Leonora Midgley
William Mcmeniman	Reggie Melonson	Alicia Miers
Arla Mcmillan	Rita Melton	Janis Miesen
Lou Mcmillion	Andrew Melzer	Laurie Mihal
Jeff McMullen	Patricia Mena	Emily Mikesell
Jack McMullen	Ann Mendelson	Melinda Milam
Sarah McNair	Maria Mendes	Spencer Miles
Michael McNally	Joy Mendez	Craig Milford
Toni McNaron	Susan Mendive	Rosana Millard
Clea Mcneely	Amanda Mendonsa	Amy Miller
Douglas Mcneill	Beverly Mendoza	Beverly Miller
N. Mcneish	Mary Menikheim	Bradford Miller
Thomas Mcpeek	Kathleen Mens	Bryant Miller
Brian Mcpherson	Scott Mercer	Christian Miller
Brian Mcshane	Julija Merljak	Christin Miller
Sherry Mctigue	Jessica Merrill	Christina Miller
Laurinda Mctucker	Pamela Merritt	Debra Hope Miller
Kelly Mcvey	Max Mersky	Debra Miller
Fran Mcwherter	Keith Merson	Diana Miller
Karin Mcwhorter	M H Mervine	Ellen Miller
Kate Mcwiggins	Typh Hainer Merwarth	Flagg Miller
John Mcwilliams	Keith Mesecher	Gail Miller
Nancy Meacham	Alice Meshbane	Greg Miller
Marcy Meachum	Sheila Messer	Harriet Miller
Carey Meade	Sharon Messinger	Howard Miller
Carolyn Meade	Steve Metcalf	Jason Miller
Elizabeth Meager	Andrea Metz	Jeffrey B. Miller
Eva Meassick	Lindy Metz	Jessica Miller
Ronny Mecca	Morgan Metzger	John and Mary Miller
Susan Mechaley	Elena Meyer	Jon Miller
David Meckler	Elizabeth Meyer	Kris Miller

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NRDC Letter Writers**

Revel Miller	Lisa Mohan	Gwendolyn Morgan
Robert Miller	Wallace Mohn	Linda Morgan
Robert Miller	Cathryn Moitoret	Richard Morgan
Robin Miller	Laurie Mokriski	Sally Morgan
Russell Miller	Carol Monaco	Sarah Morgan
Ryan Miller	Diana Moncur	Amanda Morian
Sara Miller	April Mondragon	Julaine Morley
Shannon Miller	Alison Monfort	Janelle Morman
Sharon Miller	Donna Mongelli	Gloria Morotti
Sherlee Miller	Randall Monk	Gary Morrill
Steven Miller	Christie Monson	Ann Morris
Sarah Millerberg	Kim Montague	Jesse Morris
Abigail Millikan States	Andrea Montalbano	John Morris
Elizabeth Novak Milliken	Brandi Montano	Nancy Morris
Marti Millington	Anthony Montapert	Steve Morris
Bronwyn Mills	Joe	Wendy Morris
Burris Millstone	Montapertjoe@Hotmail.Com	Donald Morrison
Larry Miloshevich	Kelly Montegna	Janet Morrison
Denise Mineart	Elizabeth Montgomery	Robert Morrison
Constance Minerovic	F. Michael Montgomery	Scott Morrison
Mary Mings	Janet Montgomery	Sandra Morrissey
Joannie Minich	Judy Montgomery	Sally Morrow
Judith Minkin	Karen Montgomery	Rio Morse
Paula Minklei	Pamela Montgomery	Dorothy Mortensen
Jason Minos	Adam Moody	Justin Mortimer
Sara Mintz	Stanley Moody	Andrew Mortland
Adele Mirshak	Chad Moon	Celine Morton
David Misch	Neal Moon	Joyce Morton
Monique Misewicz	Sandy MOON	Gary Moscaluk
Steven Miskoci	Twila Moon	Cilla Moseley
Kira Misura	Derianna Mooney	Jeff Moshier
Milan Mitch	Mary Mooradian	Karen Moskowitz
Lily Mitchel	David Moore	Charles Moss
Donna Mitchell	Debbie Moore	Kamala Mostert
Jean Mitchell	Eileen Moore	John Moszyk
Matt Mitchell	Kate Moore	Alyce Mott
Meg Mitchell	Kevin Moore	Graham Mott
Patricia Mitchell	Lucy Moore	Del Motteler
Scott Mitchell	Mike Moore	Ray Motyka
Thomas Mitchell	Nancy Moore	Wendy Mountain
Nancy Mitko	Sharon Moore	Stuart Moutrie
William Mittig	Sheila Moore	Gerald Moy
Jennifer Mitts	Pamela Morarre	Carol Moyle
Michael Mix	Shelby Moravec	Harry Mozen
Joe Mixell	Laurel Moreau	Helmut & Nancy Mueller
Mary Moeller	Cynthia Morehead	Teresa Mueller
Alexandra Moffat	Gillian Moreland	Prem Mulberry
Daryl Mognet	Brian Morgan	Phyllis Muldoon

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NRDC Letter Writers**

Vince Mulford	Gregory Nayman	Hilde Nieuwenhuysen
John Mullan	Alan Nazzaro	Ellen Nieves
Loretta Mullett	Michael Neal	Stanley Nikodem
Ronnie Mulligan	Nancy Neale	Emoke Niles
Mary Mummaw	Joanna Nebab	Nancy Nilssen
Susan Munday	Susan Neff	Dan Nimershiem
Maria Munoz	Kristen Parks Negus	Rebecca Nimoy
Angela Muñoz	Stephen Nehilla	Shane Nodurft
Anthony Mura Tore	Roger Nehring	Nicole Nogami
Randy Murbach	Catherine Nelson	James Nolan
Luis Murillo	Christena Nelson	Timothy Nolan
Faye Murman	Danielle Nelson	Nancy Nolen
Amber Murphy	John Nelson	Jen Nomura
Brian Murphy	Kathleen Nelson	Randall Nord
Cindy Murphy	Misty Nelson	Karen Nordenholz
Doug Murphy	Timothy Nero	Linda Noren
Jean Murphy	Juan Neumeister	Jane Norling
Kathy Murphy	Cornelia Neville	Lisa Norried
Molly Murrell	Nancy Nevin	Kaye Norris
Craig Murray	Maryann Nevins	Susan North
Cristy Murray	Kascha Newberry	Martha Norwalk
Michael Murray	Meagan Newberry	A. B. Nostwich
Michael Murrin	Brooke Newell	Mark Nostwich
Margaret Muscatello	Karen Newland	Sloan Nota
Julie Muskat	David Newman	Michael Noth
Susan Mutch	Liz Newman	Toni Noto
Ernst Mutchnick	Terrell Newman	William Nottingham
Nancy Myer	James Newton	Natalia Nouel
Jeff Myers	Wai Ng	Jessica Novak
Kelly Myers	Anh-Tuan Nguyen	Steven Novak
Lorraine Myers	Ly Nguyen	Janet Novatney
Marjorie Myers	Natasha Nguyen	David Novick
Mark Myers	Ting Ni	David Nowak
Nathan Myers	Shirley Nicholas	Gabriella Nunez
Dottie N	Colette Nicholl	Vanessa Nyborg
Tony Naaman	Danny Nichols	Karen Nylander
Brenda Naegel	Darlene Nichols	Lee Oakes
Lawrence Nagel	David S. Nichols	Tom Oaks
Carly Naismith	Richard Nickum	Kim Oates
Tomas Nakada	Hans Nicolaisen	Kerry O'Brien
Terry Nance	Russell Nicoletti	Shayne o'Brien
Gilbert Nancy	Jennifer Nicoletto	Tim O'Brien
Laura Napoleon	Mary Nicolini	Lauren O'bryan
Charles Napolitano	Kani Nicolls	Joseph Ochental
Karolyn Nartker	Lessli Nielsen	Michael O'Connell
Hector Nava	Trudy Nielsen	Carol O'Connor
Greg Navarro	William Nielsen	John O'connor
Julie Naylon	Martin Niemi	Roy O'connor

**Table D-1  
NRDC Letter Writers**

Kimberleigh O'crowley	Judy Orem	Louise Page
Candace Odell	M Ornelas	Robert Pagoni
Marc Odin	Dennis O'rorke	James Pahre
Stephan Odlivak	Paul Orr	Donna Paige
Dawn Odom	Susanna Orr	Patricia Paine-Dougherty
Deanne O'donnell	Theresa Orr	Leonilde Paiva
Leslie Oelsner	Nancy Orsetti	Tami Palacky
Sue Oertel	Catherine Orsi	Kinga Palatinus
William O'halloran	James Orsi	Fleur Palau
Peter O'hara	Luis Ortiz	John Palin
Robert Ohotto	Daniel Ortman	Daniel Palmateer
Max Okenfuss	Maria Orton	Jason Palmer
Betty Okrent	Rachel Ory	Jayq Palmer
Joan Okun	Rainee Osborn	John Palmer
Diane Oldfield	Hannah Osborne	Leah Palmer
Kevin Oldham	Mary Oshea	Steve Palmer
Rebecca Olean	Rhea Osland	Christine Palmeri
Sheila Olive	David Osman	Heather Pamula
Sónia Oliveira	Frank OstermanJr	Pinky Jain Pan
Eileen C. Oliver	Theo Ostler	Helen Panas
Kathryn Oliver	Rebecca Oswald	Jeanne Panell
Susan Oliver	Sarah Oswald	Heather Pankhurst
Raymond Oliver Jr	Joby Otero	Elizabeth Pannier
Louise Olivi	Kelby Ouchley	Maria Papakonstantinou
Larry Olivier	Joanne Ouderkirk	Susan Papp
Carl Ollivier	Marcia Ouellette	Ann Marie Paprocki
Charles Olmsted	Carrie Ousley	Kingsley Paquette
Mary O'looney	Deborah Outman	Michelle Paquin
Lalania Olsby	Laurence Overmire	Sharon Paquin
Alice Olsen	Gail Overton	Bob and Nora Pardo
Lauren Olsen	Barry R. Owen	Adam Parez
Stan Olsen	Douglass Owen	Charlotte Parker
A. Olson	Janet Owen	John Parker
Angela Olson	Joseph Owen	Margaret Parker
David Olson	Craig Owens	Tari Parker
Jack Olson	Dave Owens	Valerie Parker
Steve Olson	David Owens	Donna Parkinson
Yvonne Olson	Wayne Owens	Kathryn Parnes
Elaine Omalley	Faith Ozan	Maureen Parriott
Polly O'malley	Ruth Ozkul	Brandy Parris
Elizabeth Ondyak	Michele Ozuna	Edward Parrish
Julia O'neal	Mary Pace	Megan Parry
Melissa O'neil	Christopher Pacheco	Timothy Parsons
Carol O'Neill	Frank Pacholec	Therese Parys
William Oosterman	Grace Padelford	Robert Pascarelli
Cynthia Opderbeck	Charles Paden	Angela Paschall
Mary Orazem	Mary Jane Pagan	Susan Paschke
Olga Orbidan	David Page	Chloe Pashman

**Table D-1  
NRDC Letter Writers**

Alanna Pass	Christopher Pelham	Joanne Peters
Joseph Passarelli	Ana Pelinsky	Gene and Doris Peters
Mary Igoe Patey	Leslie Pellegrino	Thom Peters
Sherri Patray	Julie Peller	Alfred Peterson
James Patrin	Mark Pelsone	Allan Peterson
Dana Patsey	Kathleen Pelton	Andrew Peterson
Krista Patten	Carlos Penafiel	Brittany Peterson
Beverley Patterson	Robert Pendergrass	Donna Peterson
Brian Patterson	Richard Pendleton	John & Madeleine Peterson
Elizabeth Patterson	Julia Penn	Kathleen Peterson
Mary Patterson	Sherry Pennell	Marcus Peterson
Terri Pattison	Paul Peppard	Michael Peterson
Joyce Patton	Juliana Peragine	Susan Peterson
K L Paul	Malka Percal	Bethanie Petitpas
Michelle Paul	Constance Percival	Maria Petras
Randall Paul	Michael Percival	Susan L. Petrella
Thomas Pauley	Luise Perenne	Diane Petrillo
Terry Paull	Elisha Perez	Kenneth Petrone
Russ Paulson	Margarita Perez	Gabor Petry
Douglas Pauly	Nerina Perez	Jamie Petsitis
Gregory Pavlidis	Rosa Perez	Clara Pettegrew
Lynn Pavlik	Tiziana Perinotti	Corinne Pettey
Catherine Pawsat	Kaitlin Perkins	Maureen Petti
Jeff Payant	Kathy Perkins	Walter Pettigrew
Aaron Payette	Roberta Perkins	Beverly Petty
Andrew Payne	T. Perkins	Mike Petty
Edmund Payne	Susan Perley	Lelia Pettyjohn
John Payne	Richard Perras	Jamaka Petzak
Marian Payne	Anthony Perrault	Jan Pfeifer
Michael Payne	Joann Perrett	Nezka Pfeifer
Rita Pazniokas	Frank Perretta	Andrea Phelps
Allen Peachey	Clarisse Perrette	Jennifer Phenix
Mary Peacock	Lola Perrone	Jimmy Phi
David Peake	Erin Perry	Alan & Elizabeth Phillips
Katrina Peariso	Brooks Perry	Anne Phillips
Amy Pearl	Clif Perry	Caroline Phillips
Jessica Pearl	Felicia Perry	Janice Phillips
Jeffrey Pearlman	Karen Perry	Jon Phillips
Nancy Pearson	Patricia Perry	Justin Phillips
Deron Pease	Rebecca Perry	Maryisis Phillips
Linda Pease	Amy Perry Lippman	Sandra Phillips
Lou Peb	Rita Persichetty	Skye Phillips
Matthew Pecci	Michelle Pertl	Tom Phillips
Edward Pecelli	Candy Pertrick	Walter Phillips
Deborah Peck	Judith Peter	Ewa Piasecka
William Peck	Lydia Peter	Thomas Picciano
Robert W Peer Jr	Donna Peters	Josephine Piccoli
Jacqueline Peipert	Jean Peters	Christian Pich

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NRDC Letter Writers**

Dakota Pickett	Alice Polesky	Nicole Price
Elaine Picklesimer	Annegret Pollard	Thomas J. Price
Annette Pieniazek	Jonathon Polly	Gretchen Primack
Dave Pierce	Sura Polne	Darcy Prince
Sandi Pierce	Susan Polster	Letitia O Principato
Susan Pierce	Chris Pomeroy	Dawn Prior
Deirdre Pierotti	Cassidy Pope	Joyce Pritchard
Amy Pierre	Dona Pope	Ann Prival
Dana Pierson	Mary Poplin	Jason Proctor
Robert Pierson	David Popp	Carol Proven
Eric Pihl	Janeene Porcher	Sheri Prudhomme
Andrea Pike	Sanna Porte	Angela Pruitt
John Pilley	Gladys Porter	Jennifer Pruitt
Patti Pine	Julie Porter	Cecilia Pryor
Jacqueline Pineda	Nancy Porter	Jan Pryor
Phillip Ping	Susan Porter	James Puckett
Becca Pink	Tori Porter	Michelle Puddy
Vanina G. Pinney	William Porter	Grace Puleo
Ed Pinson	Elie Porter Trubert	Deeanne Purchase
Parrie Pinyan	Toby Poser	Daphne Purpus
Carol Piotrowski	Jane Poss	Ellen Purtill
Joan Pippi-Terzian	Amy Post	Glen & Kathleen Putman
Lisa Pisano	Rita Post	Joseph Putnam
Nancy Pistone	Jutta Poteat	Dave Pyles
Nancy Pitblado	Doris Potter	Keith Pyontek
June Pitcher	Peyson Potter	Jo-Anne Quagliana
Kate Pittard	Betty Powell	Cristin Quaglietti
Kelly Place	Dusty Powell	Jennifer Quashnick
Jeffrey Plate	James Powell	M Quento
Heather Platt	Pamela Powell	Vidya Quigley
Julie Platt	Tracy Powell	Meghan Quillen
Pamela Platt	Joy Power	Thomas/Teresa Quinn
Gary Ploski	Colleen Powers	Mark Quire
Eric Plourde	Sabrandi Powers	David Quist
David Plowden	Carol Powley	Donna R
A Plummer	Rachael Prados	R R
Olga Plyushchay	Ann Prall	Christopher Rabalais
Daniel Podell	Margaret Prasad	Sandra Rabel
Zak Podmore	Patricia Prather	Elliott Rabin
Chad Podoski	Kris Preslan	Ronald Rabin
Matthew Podowski	Jill Pressley	Rebecca Rabinowitz
Simona Podskubka	John Preston	Greg Race
Robert Podurgiel	Michael Preston	Beth Radich
Kevin Poehlmann	Heather Price	Wendy Raebeck
Donald Poel	Heather Whitney Price	Marco Rafanelli
Lloyd Pohl	Jay Conrad Price	Lisa Raffaelli
Owen Poindexter	Jimmy Price	Hal Rager
Alyssa Polacsek	Lynne Price	James Rahfeldt



**Table D-1  
NRDC Letter Writers**

Farokh Rahmani	Kelly Reed	Eric Rheinheimer
Patricia Rain	Kristin Reed	Gail Rhodes
Matthew Rainson	Lori Reed	Harriet Rhodes
Miriam Rainville	Patricia Reed	Judith Rhodes
Carol Rall	Rodger Reed	Bob Ribokas
Carla Ralston	Joseph Reel	Diana Ricci
Jeannette Ralston	Alex Reese	Grace Ricco-Pena
Kate Ramirez	Linda Reese	David Rice
Laura Ramirez	Sean Reese	Jane Rice
Alan Ramsdell	Richard Reeves	Luanne Rice
Norman F. Ramsey	Mike Refsland	Rohana Stone Rice
Todd Ramsey	Joseph D. Regan	William Rice
El Ramthun	James Register	Thomas Rice III
Tim Rand	Debra Rehn	Martha Rich
Jim Randall	Paul Reiber	Norma Rich
Henry Randolph	Garrett Reichwald	Annick Richardson
H L Rankin	Peter Reid	Bob Richardson
Meera Rao	Duncan Reid	Carolynne Richardson
Carmela Rappazzo	John E. Reid	Eloise Richardson
Ivan Rarick	Patrick Reid	Judith Richardson
Alain Rascon	Kathleen Reifke	Lynne Richardson
Sandy Rasich	Sara Reihani	William Richardson
Josh Rasin	Gay Reijo	Brooke Richert
Donna Rasmussen	Susan Rein	Kate Richman
Dorothy Rasmussen	Robin Reingold	Peggy Richmond
K.I. Rasmussen	Trudi Reinhardt	Elizabeth Richter
Helen Rattray	Jesse Reisch	Eriks Richters
Anke Raue	Paul Remagen	Margie Rick
Dorelle Rawlings	Kathleen Rengert	Miriam Rico
Liane Rawlings	Linda Renna	Beth Rider
Pamela Rawlins	Karen Renne	Janet Ridgeway
Bernard Ray	Robert Renner	Dale Riehart
Rick Ray	Rob Renouf	Dan Rifkin
Vicki Ray	Kristen Renton	Paula Riggert
Catherine Rayburn-Trobaugh	Gail Repensek	Kathy Riggs
Giselle Real-D'arbelles	Melissa Replogle	Tom Riker
Stephen Rebello	Mary Anne Reposa	Julianna & Richard Riley
Amani Redd	Bruno Rescigna	Paul Riley
David Redemer	Tina Ressa	Sally Riley
Tim Redfern	Richard Rethorn	Katherine Ringgold
Rick Redfiel	Quentin Reuer	Ann Rintz
Paula Redinger	Mike Reust	Lisa Riordan
Dave & Ann Redmon	Frankie Reuter	Nicole Rios
Walter Reece	Anna Katherina Reycraft	Thomas Rippe
Thomas Reeck	Mila Buz Reyes	Susan Ripple
Alison V. Reed	Judy Reynolds	Keegan Rissanen
Jacquie Reed	Margarite Reynolds	Wendy Ritchey
Janis Reed	Trish Reynolds	Calvin Rittenhouse

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NRDC Letter Writers**

Jane Rittenhouse	Betsy Rodier	Brigit Rossbach
Joel Ritter	Elizabeth Rodriguez	Edna Rossenas
Nilda Rivera	Javier Rodriguez	David Rosten
Mirian Rivera-Shapiro	Kelly Rodriguez	Chris Roth
Gaetano Rizzi	Mildred Rodriguez	Mark Roth
Cindy Rizzo	Beth Roe	Holly Rothschild
Frederic Rizzo	Wesley Roe	Ernest Rotramel
Kim Roach	Kristin Roehl	Patricia Rouen
Patricia Robak	Donald Rogers	Jill D. Rouke
Justin Robarge	Jan Rogers	Donna Rouse
Cheryl Robbins	Karen Rogers	Kevin Roush
Frederick Robbins	Molly Rogers	Dedra Routh
Gina Robbins	P Rogers	Chantal Roux
Janet Robbins	Robyn Rogin	Nancy Rovin
Patricia Robbins	Suzanna Rogstad	Annette Rowe
Denice Roberge	Kathy M. Rohr	Lorene Rowland
James Roberts	David Rojas	Karen Rowley
Jennifer Roberts	Karen Roland	Allen Royer
Mike Roberts	Beverly Rolfsmeyer	Rich Royer
Michael Robertson	Carmen Rolon	Julie Rozenfeld
R. Robertson	Yuri Romaniuk	Susan Rozsa
Frances Robeson	Mary Romeo	Diana Rubidoux
Suzanne Robets	Linda Romero	Steven Rubin
Ethan Robillard	Rosalind Romney	Sophia Rubinstein
Margaret Christine Robinett DC	Tom Rook	Roberta Rubly-Burggraff
MSTCM CMT	Ann Roos	Dennis Ruby
Berklee Robins	Beverly Root	J. Wayne Ruddock
Carol Robins	Lauren Root	Linda Rudin
Brenda Robinson	Nina Root	Pam Rudolph
Anette Robinson	Sarah Rorick-Orlando	Shannon Rudolph
Barbara Robinson	Jolyn Rosa	John Rueckert
Bina Robinson	Scott Rosak	Barbara Rush
Dorene Robinson	Nola Rosdahl	Ellen Ruskin-Gillman
Harold Robinson	John Rose	Anne Russell
Joyce V-L Robinson	Michael Rose	Eddie Russell
Richard Robinson	Victoria Rosen	June Russell
Roxana Robinson	R. J. Rosenberg	Lauren Russell
S. Robinson	Paul Rosenberger	Tracey Russo
Stephanie Robinson	Michelle Rosenblatt	Karen Ruth
Tim Robinson	Jamie Rosenblood	Francie Rutherford
Laurie Robinson-Hipple	Jessie Rosenthal	Sondra Rutherford
Sandra Rocha	Brian Rosian	Barbara Ruzicka
Jessica Rocheleau	Veronica Rosing	Frances Ryan
Dave Rock	Bettina Rosmarino	Marylou Rynkiewicz
Mel Rock	Ina Ross	Sharon Rysdam
Brent Rocks	Stephanie Ross	Susan Ryza
Christopher Rockwood	Valerie Ross	Erika Rzomp
Patricia Rodgers	Wilson Ross	Nancy Saar

**Table D-1  
NRDC Letter Writers**

Nick Sabetto	Patricia Sansone	Robin Schielke
Marcus Sabini	Sara Santa	Tracy Schiess
Isabella Sacca	Lynn Santilli	Rob Schiferl
Kimball Sachs	Richard Santivong	Veronica Schindler
Judy Sachter	John Santora	Lizzi Schippert
Ann Sack	Gary Santoro	Tim Schirber
Heidi Sackreuter	Thomas Santoro	Scott Schlachter
Sima Sadafi	Mark Sapiro	Laura Schlegel
Laura L. Sadler	Gloria Sappier	Sylvia Schleimer
Selva Sagazio	Rick Sardinha	Anne Schlesinger
Kristine Sage	Jean Sargis	Linn Schlinger
Gary Sager	Donna Sasso	Elliot Schloss
Guadalupe Sahagun	Gianni Sasso	Richard Schloss
Beverly Saidel	Dan Satchell	Nina Schlueter
Jean Saja	Etta Satter	Ian Schmertzler
Pamela Saladino	John Satterfield	Jean Schmidlein
Edward Salazar	Suzan Satterfield	Carly Schmidt
Marina Salazar	Jack Saturn	John Schmidt
Raegan Sales	Greg Satz	Louis Schmidt
Carla Salido	Crystal Savage	Teresa Schmidt
Barbara Sallee	Scott Savett	Dawn Schmit
Michelle Salois	Elizabeth Savory	Donna Schmitt
Jennifer Salome	James Sawdy	Elisheva Schneeberger
David Sals	David Sawtelle	David Schneider
Andrew Salter	Janis Sawyer	Mary Jo Schneider
Barry Saltzman	Jillian Saxty	Patricia Schneider
Micheline Saluga	Lois Sayers	Richard Schneider
James Salvaggio	Paul Sbrizzi	Wendi Schneider
Michael Salvo	Youness Scally	William Schneider
Joan Samara	Christopher Scanlon	Andrew Schnorr
Sandi Samel	Lucca Scariano	Laura Langford Schnur
Milton Samelson	George Schaberg	Andrew Schob
Chris Sammartino	Simone Schad	Cathy Scholl
David Samokar	Billie Schadt	Rebecca Schooley
Jaime Samour Wrsan	Roberto Schaefer	Georgia Schoonmaker
Carolyn Sampley	Laurie Schaetzel-Hill	Ellen Schorr
Frederick Samuels	Duane Schat	Brittney Schramm
Marian Samuelson	Mark & Susan Schauer	Michael Schramm
Jonathan Sanborn	John Schaut	Lawrence Schroeder
T Sancartier	Elias Scheer	Susen Schroeder
Jade Sanceri	Steve Scheer	Tiffany Schroeder
Karen Sanchez	Bud & Karen Scheie	Julie Schroeppel
Tami Sandaker	Judith Scher	Kathryn Schubert
Phyllis Sandel	Paul Scherdell	Michael Schuessler
Tracy Sanders	Andrea Scheri	Steve Schueth
Ann Sandritter	Marvin & Linda Scherl	Urs Schuler
James Sanford	Kathy Schermerhorn	Linda Schultz
David Sansone	Morgen Schick	Mary Schumacher

**Table D-1  
NRDC Letter Writers**

Arthur Schurr	Charles R. Seggerman	Gabriel Sheets
Stephanie Schus	Robert Seibert	Kris Shellum-Allenson
Francine Schwart	Heidi Allisson Seiler	Janet Shelton
Barry Schwartz	Kali Seisler	Gloria Shen
Brian Schwartz	Suzanne Selby	Michael Shenkin
Charles Schwartz	Sean Sell	Brian Sheppard
Doug Schwartz	Sarah Selph	Robert Sherburne
Elizabeth Schwartz	Kathleen Seltzer	Anthony Sherman
Teresa Schwartz	Brenda Semienko	Elise Sherman
Walter Schwarz	Peggy Semmler	Linda Sherman
Richard Schwerin	Chetan Sen	Robyn Sherrill
Karen Frank Scotese	Jon Senour	Boyce Sherwin
Christine Scott	Dimitri Serafimides	Gail Sherwood
Eric Scott	Steven Serbousek	L. Sherwood
Harlan Scott	Luanne Serrato	John Shetron
Kathryn Scott	Timothy Sessions	Michele Shields
Kenna Scott	Greg Settle	Yosh Shimono
Laurel Scott	Joseph Severino	Carolyn Shinn
Mike Scott	Theresa Severson	Betty Shipley
Scott Scott	Mike Sexton	Brian Shipley
Shannon Scott	Miriam Sexton	Jason Shipley
Vanessa Scott	Matthew Seymour	Dorinda Shipman
Wenona Scott	Stephanie Seymour	Laina Shockley
Eric Scranton	Kay Shade	Diana Sholtz
Mary Scribner	Lois Shadix	Martha Shore
Sheldon Scrivner	Paula Shafransky	David Shore
Jeanne Seals	Davira Shain	Marianne Shouse
Amy Seaman	Charlotte Shandley	Carol Shriver
Michael Seaman	Brad Shank	Dean Shrock
Linda Sear	Lori Shannon	Hannah Shucard
Andrew Sears	Mike. Shannon	Jacqueline Shulters
Erin Sears	Amy Shapira	G. Shupe
Roy D Sears	G Shapiro	Marguerite Shuster
Karla Seaver	Irving Shapiro	Melanie Shuter
Giselle Sebag	Michael Shapiro	Tracy Shwaery
Scott Sebastian	Sara Shapiro	Mark Shwayder
Mary Sebek	Mary Sue Sharer	Bonnie Shwery
T. Sebrell	Meghan Sharkey	Kathryn Sibley
Ann Seccombe	Andrew Sharp	Shana Siegel
Klara Seddon	Duke Sharp	Pamela Siegman
Michael Sederholm	Melssa Sharp	Teri Sigler
Barbara Seeber	Mary Sharp-Davis	Henry Sikkema
Tammara Seeger	Bill Shashaty	Elizabeth Bisbee Silber
Edward Seekamp	Christine Shaw	Kathy Silbert
Russ Seekatz	George Shea	Karen Sillas
John Seeley	Keith Shea	Doug Silsbee
Marsha Seeley	Shawn Shea	Kayla Silvagnoli
Bob Segal	Maureen Sheahan	Margaret Silver

**Table D-1  
NRDC Letter Writers**

Ronald H. Silver C.E.P.	Stacey Skole	Jewell Smith
Lisa Silverman	Kate Skolnick	Judith Smith
Lorin Silverman	Audrey Skowronski	Juli Smith
Ruth Silverman	Margaux Sky	Kate Smith
Linda Silvers	Debbie Slack	Kathleen Smith
Korey Simeone	Michele Slate	Lauren Smith
Dee Simmons	Leda Slattery	Laurence Smith
Joseph & Alison Simmons	Leslie Slavens	Laurie Smith
Julia Simmons	Robert Slavik	Leroy Smith
Grace Simms	Zachary Slavin	Leslie Smith
Amanda Simon	Michael Slavish	Mary Ann Smith
Geoff Simonds	Stephen Sleeper	Michael Smith
Chris Simpkins	Matt Sloat	Pat Smith
Jane Simpson	Lucas Slott	Paul Smith
Philip Simpson	Marya Small	Phyllis Smith
Susan Simpson	Sally Small	Prudence Smith
Tom Simpson	Merle Smallwood	R Smith
Jay Simser	Spencer Smallwood	Renelouise Smith
Kia Sinay	Sheryl Smetana	Robert Smith
Alicia Sinclair	Charles Smith	Ron Smith
Karen Sinclair	Aimee Smith	Sarah Smith
Phyllis Sinclair	Andrew J. Smith	Shawn Smith
Kate Sinding	Angele Smith	Sherry Smith
Alice Singer	Annick Smith	Sheryl Smith
Danielle Singer	Barbara Smith	Shirley Smith
Ellen Singer	Barry Smith	Stan Smith
Seymour Singer	Brianne Smith	Stephen Smith
Sharon Singer	Brooker Smith	Katrin Smithback
David J. B. Singer MD FACS	Cam Smith	Amanda Smock
Marjory Singher	Carol Smith	Beverly Smrha
Robin Singler	Charles Smith	Joanne Snegosky
Susan Sinotte	Cindi Smith	Denise Snell
Carol Sinsheimer	Clayton Smith	Marilyn Snider
Robert Sipe	Cory Smith	Ronda Snider
Eva Sippl	Cynthia Smith	Deborah Snipes
Smith Siromaskul	David Smith	Richard Snook
David Sittinger	E M Smith	Gary Snyder
Shaun Sittinger	Emily Smith	Maggie Snyder
Carol Sivesind	Evan Smith	Peter Snyder
Teresa Skaggs	Gail Smith	Robert Snyder
Sharon Skala	Gaye Smith	Todd Snyder
Karen Skalitzky	Gerald R. Smith	Tom Snyder
Lynda Skeen	Gertrude Smith	Wanda Webber Snyder
Michael Skiba	Gloria Smith	Kenneth Sobieraj
Cory Skinner	Jaime Smith	Mark Sohasky
Russell Skinner	Jane Smith	Clementina Soika
Victor Skloff	Janet Smith	Jane Ward Solomon
Matthew Skoglund	Jerry Smith	Roberta Solomon

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NRDC Letter Writers**

Trish Solomon	Roberta Staley	Todd Steponick
Deborah Soloway	Carolyn Stallard	Mark Sterkel
Ed Somers	Alan Stamm	Cedron Sterling
Janet Somerville	Claire Stancek	Paula Sterling
Heather Sommerdyke	Tina Stanford	Albert Sterman
Ronna Sommers	Cedar Stanistreet	Kelly Stern
Alex Sonneborn	Ruth Stankiewicz	Linda Stern
Cathy Sonneborn	Lowell Stanley	Susan Stern
Greta Sorensen	Rhonda Stannard	Warren Stetzel
Marshall Sorkin	Lesley Stansfield	Laurie Stetzler
Mary Ann Sorokie	Heidi Stanton	Arthur Steuer
Riley Sorrells	Andrew Stapinski	Gary Stevens
Jessica Soske	Veronica Stapleton	Jamie Stevens
Veronika Soul	Suzy Star	Judith Stevens
Michael Souza	Frances Stark	Katrina Stevens
Mister Sowers	Joseph Stark	Leigh Ann Stevens
Frank Spada	Susan Stark	Marian Stevens
Will Spangler	Carole Starkes	Patricia Stevens
Barrett Sparkman	Mildred Starrett	James Stevenson
Jonathan Sparrow	Mary Beth Starzel	Joan Stevenson
Bev Spaulding	Gina Staskal	Valery Stevenson
John Spear	Darlene Statz	Olga Stewart
Allison Spencer	Donna Statz	Anne Stewart
Heather Spencer	Sophie Stauffer	Dana Stewart
Lee Anne Spencer	Ann Stavig	Jeffrey Stewart
Lisa Spencer	Martha Stayton	Jenny Stewart
Julie Spengler	Janey Stearns	Rachel Stewart
Della Sperling	Hayden Stebbins	Theresa Stewart
Tanya Spicer	Judith Steckel	Vaden Stewart-Albin
Brett Spiegel	Bunni Steele	Roma Stibravy
Bruce Spiegelberg	Karen Steele	Tanja Stich
Carol Spillane Mueller	Yoyi Steele	Jean Stidham
Ray Spilsbury	Elizabeth Steen	Ana C Stieglitz
Constance Spinney	Larry Steen	Noel Stiller
Errol Spiro	Marie Steen	Deanna Stillings
Andrew Spitalny	Pamela Steen	Sharon Stillwater
Susan Spivack	Rose Steff	Pamela Stilp
John Sprague	Keith Stegath	Thomas Stinchcomb
Haskell Springer	Bruce Stegman	Constance Stinson
Judith Springer	John Steiner	Adam Stipano
Aimee Squires	Nicholas Steiner	Kimberly Stirling
Amy Squires	Lynne Steinman	Laura Stjohn
Samuel St. Marie	Evie Steinmetz	Arianne Stocking
Kathy St. Onge	Tammy Stellanova	Betty Stockton
Greg St. Peter	Michael Stenson	June Stoelzel
Alycia Staats	Michelle Stephanos	Lise Stoessel
Pam Stacey	Carole Stephens	Pamela Stogner
David Stack	Jan Stephenson	Filip Stoj

**Table D-1  
NRDC Letter Writers**

Daniel Stoltzfus	Jeffrey Stuhl	Susan Tackett
Carl Stone	Sita Stuhlmiller	David Taenzer
Caroline Stone	Margaret Stuhldreier	Robert Tajima
Diana Stone	Decherd Stump	David Talamo
Fauna Stone	Martin Stumpf	Jacques Talbot
Kenley Stone	Maureen Su;;Ivan	Margaret Talbot
Matthew Stone	Toby Suckow	Elizabeth Tallent
Reba Stone	Dorit Suffness	Kris Talley
Frank Story	C.S. Sullivan	Jorge Tamargo
B Stout	Fran Sullivan	Frances Tan
Patrick Stout	Jacqueline Sullivan	David Tana
Kathleen Stovel	Michelle Sullivan	John Tangney
Gretchen Stover	Teresa Sullivan	Naimeh Tanha
David Stowe	Rebecca Summer	Donna Tanner
Maynard & Elizabeth Stowe	Janet Summers	Mary Tanoury
Darren Strain	Amber Sumrall	AnnLaura Tapia
Valerie Strait	Bonnie Sundance	Lila Tarajkowski
Alan Straith	Carol Sutherland	Terri Tarango
Gayle Strand	Mary Sutherland	Barbara Tarbell
Shirley Strandberg	Linton Suttner	Bryan Tarbox
Trevor Strandness	Mark Sutton	Thelma Tarleton
Michelle Strange	Tammy Svjagintsev	Chris Tasara
Voni Strasser	Ted Swagerty	Mike Tasker
Jewels Stratton	Robert & Mary Swain	Connie Tate
Marcus Straub	Luanne Swainson	Sally Tatem
Susaan Straus	Chris Swan	Daria Tavoularis
Deborah J Strauss	Susan Swan	Brigitte Tawa
Kevin Strawbridge	Phyllis Swank	Alan Taylor
Marcia Strean	Dean Swartz	Angela Taylor
Nancy Strear	Kathy Sweany	Beth Taylor
Robert Strebeck	Carol Sweeney	Carey Taylor
David Streck	Margaret Sweeney	Carol Taylor
John Streete	Sharon Sweeney	Dj Taylor
Terry Stretch	Riva Sweetrocket	Jane Taylor
Phil Strickland	Sondra Swenson	Judy Taylor
Susan Strickland	J.E. Swenson-Eldridge	Kirk Taylor
Willis Strickland	Shawna Swetech	Lauren Taylor
Lisa Strissel	Chrsitine Swientek	Marsena Taylor
Adam Strom	Paul Swift	Melody Taylor
Ernest Stromberg	Michael Swiger	Robert Taylor
Sharon Strong	Mark Swoiskin	Steven Taylor
Mary Ellen Strote	Allen Symonds	Timothy D. Taylor
Kelly Stuart	Laura Syperda	Virginia Taylor
Michele Stuart	Marianne Szalega	Yedvart Tchakerian
Peter and Vicky Stuart	Jan Szostek	Heather Teague
Richard Stuart	Gary Szpatura	Rebecca Teeters
Michelle Stuckey	Anthony Szpilka	Albert Temmins
Scott Stuemke	Nancy Tabler	Dan Temple

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NRDC Letter Writers**

Robt Temple	Gay Thormann	Michael Totten
Suzanne Temple	William Thornberry	Alexandra Tower
M. Teppner	Kimberly Thorne	Shala Towery
Jennifer Terhune	Amanda Thornton	Julie Townsend
Diane Terr	Tom Thorpe	Stuart Trabant
Beatriz Terrazas	Ed Throckmorton	Steven Tracy
Alden Terry	Ann Thryft	Josef Trapani
Joanne Terry	Hans Thummel	Kimberly Trathen
Patricia Terry	Darlene Thyen	Patricia Traub
Kelly Terzo	Larissa Tibbles	Annabelle Travis
Judy Tessem	Kris Tibsherany	Carolyn Treadway
Susan Thames	Joseph Tieger	Matt Trebella
Katherine Thauwald	Leann Tigges	Lois Trebisacci
Jeff Thayer	Katherine Tildes	Carol Tredo-Yolton
Tom Thayer	Terry Tillman	Robert Treuhaft
Caitlain Theakston	Maria Tillmanns	Cecil Trevathan
Janet Thew	Jill Timm	Colin Treworgy
Joseph Thiele	Deb Tinawi	Margot Treybig
Lauren Thiesen	Gloria Tinney	Sheree Tribble
Peter Thiess	Barbara Tischler	Scott Triesmann
Shelley Thomas	Tammi Titsworth	Asdur Triff
Mat Thomas	Dona Titus	Ashley Trine
Adrienne Thomas	Heidi Tiura	Christina Trinidad
Jean Thomas	Mark Tobias	David Trione
John Thomas	Beverly Todd	Chris Tripler
Patrice Thomas	Laurie Todd	Wendy Tripp
Peggy Thomas	Tom Todd	Laura Trisiano
Peter Thomas	Ellen Todras	Susan Trofatter
Steven Thomas	Taku Tokuyasu	Kevin Trotta
Art Thompson	Jennie Tollison	Elaine Trujillo
Bonnie Thompson	Margaret Tollner	Francesca Truman
Brigham Thompson	Evelyn Tombach	Cheryl Tsai
Chris Thompson	Tim Tomke	Vicky Tsoi
Cyndi Thompson	Linda Tomlinson	Stephenie Ambrose Tubbs
Donna Thompson	Carol Tomusiak	Harry J Tucci Jr
Doug & Robin Thompson	Thierry Tondusson	Nancy Tucher
Janice Thompson	Kevin Toney	Mea Tucker
Jo Thompson	Daniel Tonkin	Daniel Tucker
Kendra Thompson	Stephen Topia	Valerie Tucker
Louise Thompson	Carol Torchia	Veronica Tucker
Matthew Thompson	Laurie Torkelson	W Tucker
Patricia Ann Thompson	Diana Torline	Celia Tudor
Phebe Thompson	Liz Tormes	Linda Tullock
Tomiko Thompson	Philip Torres	Alexandra Tumarkin
Scott Thomsen	Tatiana Torres	James Tumlinson
David & Michelle Thomson	Melinda Tossani	Paul Turcksin
Marcus Thomson	Jane Toth	Valerie Turgeon
Kathi & John Thonet	Jennifer Toth	Marc Turkel



**Table D-1  
NRDC Letter Writers**

Jak Turner	Jennifer Vanbergen	Judy Visser
Jody Turner	Gerard Vandeberg	Cindy Vissering
Mike Turner	Greg Vanden	Lani Vlaanderen
Russ Turner	Rita Vandenburg	Marsha Vlah
Edmund Turner Jr.	Susan Vanderheiden	Harvey Vlahos
Anamyn Turowski	Carol Vanderschaaf	Anca Vlasopolos
Bonnie Turrentine	Marianne Vanek	Philippa Vlasov
Eric Tussey	Steven Vanmeter	Nathan Vogel
Phillip Twombly	Tony Vanoni	William Vogler
Liz Tymkiw	Nelvia Van't Hul	Kevin Vognar
Lynn Ubhaus	Robin Vantassell	Sara Volk
Lori Ugolik	Elaine Vardas	Evelyn Vollmer
Norma Uible	Marian Vargas	Brian Von Bork
Patricia Ulin	Karen Varney	Angeline Von Fuchs
Ann Ullman	David Varnum	Claudia Von Grunebaum
Linda Ullrich	James Vaughan	Pamela Voorhees
Laurel Ullyette	Kevin Vaught	Dominique Vorillon
Kim Umemoto	Vanessa Vaught	Victoria Vosburgh
Joseph Umstead	Octavio Vega	Barbara Voss
Mebba Underdown	Abraham Velez	Janesse Voss
Mary Unmuth	Joseph Vella	Sarah Vota
E. Unum	William Vencill	Rocky Votolato
Jennifer Upchurch	Patricia Vendryes	Katerina Vouzani
Dona Upson	John Ventre	M Vozoff
Robert Uptain	Douglas Venverloh	Adam Vrbanic
Julie Upton	Shellie Ver Meer	Ronald Vroon
Richard Upton	Emilio Verdugo	Max Vrugt
Jami Urbanic	Shirley Verhoorn	Josh Vrzal
Rowena Vaca	Jeffrey Vermillion	Kim Vu
Joan Vacca	Anne-Louise Vernon	Stephen Wachter
William Valaika	Marie-Anne Verougstraete	Christine Waddell
Brooke Valen	Kelsey Verrillo	Natalie Wade
Sam Valenti	Kathryn Vestal	Barbara Wadkins
Jeffrey Valentine	Samuel Veta	Donna Wadsworth
Ana Valeria Rodriguez	VÃ©ronique VIALA	Katie Wadsworth
Sonya Vallet	Margaret Vialet	Kate Waetje
Dan Valley	Thaynã; Viana	Elizabeth Wafford
Sascha Van Creveld	Sarah Vickers	Debra Waggoner
Robert Van De Castle	Laurence Victor	Chris Wagner
Lisa Van De Water	Prince Victoria	David Wagner
Beate Van Der Schalie	Carole & Gian Vidali	David Wagner
Martie Van Der Voort	Barbara Vieira	Jim and Virginia Wagner
Mary Van Egmond	Sharyn Viel	John Wagner
Marilyn Van Oppen	Beatriz Villa	Lisa Wagner
Justine Van Ostran	Ana Villagran	Michael Wagner
Karen Van Sant	Aleris Villegas	Robert Wagner
Susan Van Straaten	Joseph Vincent	Sally Wagner
Scott Van Til	Sandy Visse	Theresa Wagner

**Table D-1  
NRDC Letter Writers**

Mikal Wagstaff	Edward Walworth	Robert Weber
B. Wahl	Sandra Wanamaker	Dee Webster
Barbara Waindle	Andy Wanning	Diana Webster
Damon Waitkus	Christopher Ward	Lucille Webster
Judy Wakeford	Jennifer Ward	Mary Webster
Justin Walcroft	Rita Ward	Rosemary Webster
Karen & Ron Waldear	Katrina Wardrip	Joann Wedge
E Gail Walder	Edward and Anne Wardwell	Jo Wegeforth
Fay Waldo	Clifton Ware	William Weigand
Kelly Waldrep	Marian Ware	E. Jennifer Weil
Angela Waldron	Julie Warholic	Patricia Weil
Rachel Wales	Frank Warmath	Wendy Wein
David Walker	Christopher Warneke	Leonard Weinbaum
Dawn Walker	Barbara Warner	Nancy Weinbaum
Gary Walker	Allison Warren	Peter Weiner
Hallam Walker	Barbara Warren	Janice Weinmann
Jesse Walker	Clarence Warren	Steve Weinshel
Joseph Walker	Andrew Warshaw	Casey Weinstein
Kathleen Walker	Julie Wartell	Joseph Weinstein
Kevin Walker	Scott Warwick	Marie Weis
Lorna Walker	Michael Washenko	Janet Weisberg
Pat Walker	Rich Wass	Kayla Weisdorf
Roslyn Walker	Lorraine Wasso	Liz Weiser
Susy & Eddie Walker	Karen Waters	Cheryl Weiss
Alex Wall	Kevin Watkins	Dana Weiss
Janet Wall	Adam Watson	Marc Weiss
Mary Wall	Deanna Watson	Margaret Weiss
Anne Wallace	John Watson	William Weiswasser
Dawn Wallace	Kim Watson	Stephen Weitz
Diane Wallace	Paul Watson	Beverly Welber
Matthew Wallace	Don Wattenbarger	K Welborn
Ryan Wallace	Jeff Watters	Joanna Welch
Stephen Wallace	Chuck Watts	Keith Welch
Bob Walls	Paul Watts	Kathryn Welcher
Chris Walsh	Sherry Watts	Stephen Welgos
Christopher Walsh	Kathleen Waugus	Michelle Welk
Jane Walsh	Nancy Alicia Wayland	Mary Wellington
Susan Walsh	Tracy Weatherby	Robert Welliver
Christopher Walter	Bridget Weaver	Pamela Wellner
Jessica Walter	Beth Webb	Allen Wells
Lisa Walter	Brad Webb	Anne Wells
Denise Walters	Jennie Webb	Barbara Wells
Garrett Walters	Kimberly Webb	Barbara Wells
Mary Barbara Walters	Nancy Webb	R Wells
Daniel Walthall	Peter Webb	Susan Wells
Marcus Walther	Tom Webb	Bob Wellsted
Florence Walton	Dalles Webber	Jack Welscott
Mike Walton	Holly Weber	David Weltman

**Table D-1  
NRDC Letter Writers**

Joel Welty	Glenn Whiteside	Chris Williams
Mark Wemple	Valarie Whiting	Christina Williams
Ingrid Wendt-Salisbury	Casey Whitlatch-Carter	Craig Williams
Holly Wenger	Adam Whitlock	Jerius Williams
Kristen Weniger	William Whitlock	Marsha Williams
Manfred Wenner	Aimee Whitman	Megan Williams
Richard Wentzel	Cora Whitmore	Michael T Williams
Kenneth Wenzel	C. Whitney	Octavia Williams
John Werner	Calli Whittall	Patricia Williams
Katherine Werner	Elizabeth Whyte	Rachel Williams
Kirstyn Werner	Mary Wick	Randall Williams
Sk Werner	Kelly Wicks	Scott and Sarah Williams
Denise Wertz	Janet Widell	Sean Williams
Mary Wessely	Allan Widmeyer	Brad Williamson
Delyla M West	Chuck Wieland	Aileen Williamson
Marla West	Crystal Wiener	Jane Williamson
Susan West	Jim Wies	Lisa Williamson
Mary Westcott	Joseph Wiesner	Lorraine Williamson
David Westerfield	Sunni Wigand	Mark Williamson
Jarian Westfall	Annette Wigert	Karen Willis
Teresa Westhoff	Stewart Wiggers	Nancy Willis
Jeff Westling	Pamm Wiggin	Patricia Willis
Julie Weston	Tim Wigington	Samuel Williston
Nicole Westre	Victoria Wikle	Genevieve Willson
Caroline Wethern	Kathy Wilburn	Kayleigh Wilson
Glen Wetzal	Amy Wilcox	Amy Wilson
Emily Whalen	Margie Wildblood	Andrew Wilson
Lori Whalen	Sinead Wilder	Bill Wilson
Carey Wheaton	Stephen Wiley	Brian Wilson
Matthew Wheeler	Wendy Wilhelm	Cassandra Wilson
Robert Wheeler	Adam Wilhite	Connie Wilson
James Wheelock	Roy Wilhite	Cynthia Wilson
Noel Whelan	Tim Wilke	Darla Wilson
Noreen Wheller	David Wilkes	Elaine Wilson
Ginger Whellock	Erin Wilkes	Gail Wilson
Tony Whetstone	Trisha Wilkie	John Wilson
Muriel Whitcomb	Sherry Wilkins	Katherine Wilson
Amy White	Jean T. Wilkinson	Kim Wilson
Ann White	Richard Wilkinson	Kimberly Wilson
Ann White	Sasha Wilkinson	Mary Wilson
Ariel White	Cathy Wilkowske	Patricia Wilson
Kathy White	Laurie Willets	Steve Wilson
Lois White	Marie Williams	Tom Wilson
Orlie White	Becky Williams	Virginia Wilson
Robert White	Carla Williams	Barry Winfield
Stephen White	Carrie Williams	Gordon Wing
Lin Whitecloud	Charlie Williams	Greg Wingard
Gina Whitehead	Cheryl Williams	Jeremy Winick

**Table D-1  
NRDC Letter Writers**

Hayden Winkler	Tammie Woody	Geoffrey Yost
Shelley Winkler	Barbara Woolley	Elaine Young
Tracy Winn	Jane Woolsey	Grace Young
Lauren Winn-Dallmer	Ann Wooster	Jennifer Young
Kerry Winslow	Julia Worcester	John Young
Bari Winter	Loretta Workman	Katie Young
Sherry Winterson	Amy Worsham	Lahna Young
Barbett Wintersteen	Tracy Wotten	Robert Young
Charles Wirth	Brian Wozniak	Gwendolyn Youngblood
Rudi Wirth	Brad Wright	Kristina Younger
Linda Wise	Carol Wright	Eric Youngman
Gretchin Witman	Colleen Wright	Rachel Youngstrom
Mary Witmer	Greg Wright	Gary Youra
Janet Witte	Madeline Wright	Elaine Yu
Sarah Witter	Marge Wright	Penny Zahler
Derich Wittliff	Mary Wright	Susan Zalon
Julia Wittnebel	Nancy Wright	Irena Zamecki
Dane Wojcicki	Preston Wright	Pedro Zapata
Pamela & Peter Wojcik	Rhonda D. Wright	Sandra Zarcone
Susan Wold	Stephanie Wright	Shawne Zarubica
Adam Wolek	Sydney Wright	Susan Zarzycki
Andrea Wolf	Kerrie B. Wrye	Bob Zeller
Ed Wolf	Sylvia Wulf	Carl Zellner
Esther B. Wolf	Drausin Wulsin	William Zemanek
Margaret Wolf	Doris Wunsch	Charlie Zender
Michael Wolf	Betty Wurtz	Lois Zender
Susan Wolf	Patricia Wyenandt	Nicole Zenteno
Wesley Wolf	Mary Wylie	T.J. Zenzal
Dorotha Wolfe	Brian Wynne	Lesli Zephyr
Jacqueline Wolfe	Christine Wysmyk	Michael Zerner
Jessica Wolfe	Lisa Yaeger	L. Zeveloff
Kathleen Wolfe	Sally Yanagawa	George Zgela
Susan Wolfe	Michael Yankaus	Michelle Zhao
Karren Wolfram	Corina Yara	Paige Ziehler-Martin
Amy Wolfthal	Raya Yarbrough	Jeffrey Ziembra
Barbara Wollman	Greg Yeargain	Claire Ziffer
Christina Wong	Holly Yeatman	Helen Zike
Don Wood	Mark Yedor	Galina Ziminski
Marian Woodard	Peter Yee	Elsan Zimmerly
Karin Wooden	Edith Yelland	Charles Zimmerman
Helen Woodfield	Michael Yellin	Ellen Zimmerman
Cheryl Woodington	Pauline Yetter	Loy Zimmerman
Robert Woodley	Joyce Yeung	John Zimmermann
Steve Woodman	William (Bill) Yoak	David Zimney
Brian Woodrich	Gordon Yohe	Susan Zinck
Deborah Woods	George Yonge	Dania Zinner
Johnathan Woodward	Jennifer York	John Zipperer
Donald Woodworth	Shannon York	Doris Zobal

**Table D-1  
NRDC Letter Writers**

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Mary Zoeller	Jarett Zuboy	Roel Zylstra
Elizabeth Zographos	Marguery Lee Zucker	

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