



Jefferson City
Safety Rest Area Study

SUMMARY REPORT

December 2019



VISION ZERO
zero deaths • zero serious injuries
MONTANA DEPARTMENT
OF TRANSPORTATION



DOWL

TABLE OF CONTENTS

Acknowledgements.....	i
Executive Summary	ii
1.0 Introduction.....	1
2.0 Existing Conditions Analysis.....	3
2.1 Network Spacing and Demand.....	3
2.2 Water Rights and Water Systems.....	6
2.3 Public Wastewater Systems	7
2.4 Building Structure.....	9
2.5 Ramps and Parking Areas.....	10
2.6 Site Amenities	12
2.7 Accessibility	13
2.8 Safety Rest Area Maintenance.....	14
2.9 Environmental Conditions	15
3.0 Public and Stakeholder Involvement	21
3.1 Study Websites and Study Posters	21
3.2 Team Meetings	22
3.3 Survey Summaries.....	22
3.4 Stakeholder Interviews	22
3.5 Written Comments	23
4.0 Needs And Objectives.....	23
5.0 Alternatives.....	24
5.1 Alternative Identification	24
5.2 Screening.....	25
6.0 Conclusions And Next Steps	32

FIGURES

Figure 1: Study Area.....	2
Figure 2: Jefferson City Safety Rest Area Spacing Analysis	4
Figure 3: Wetlands and Waterways Within the Vicinity of The Study Area	16
Figure 4: East Helena – Boulder Gas Line.....	18

TABLES

Table 1: Jefferson City Safety Rest Area Spacing Analysis	3
Table 2: Parking Demand Analysis.....	5
Table 3: Rest Area Water Right.....	6
Table 4: Jefferson City and Truck Parking Contracted Maintenance Costs.....	15
Table 5: Public Review Poster Locations.....	22
Table 6: Screening Summary	31

APPENDICES

Appendix A: Photo Log	
Appendix B: Parking Demand Calculations	
Appendix C: Water Right, Well Log Reports, and SWDAR	
Appendix D: Preliminary Wastewater System Sizing	
Appendix E: Record Drawings	
Appendix F: Accessibility Data	
Appendix G: Soils Data	
Appendix H: Geologic Condition	
Appendix I: Water Quality Impairment	
Appendix J: Wetlands and Waterways	
Appendix K: Hazardous Materials	
Appendix L: Noxious Weeds	
Appendix M: General Wildlife, SOC, and T&E Species	
Appendix N: Economic Characteristics	
Appendix O: Public and Stakeholder Coordination	
Appendix P: Cost Estimates	
Appendix Q: FHWA Non-Regulatory Supplement	

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EXECUTIVE SUMMARY

The 2019 Rest Area Plan Health Index Update identified several potential concerns at the Jefferson City Safety Rest Area relating to the number of oversized vehicle parking spaces and the remaining service life for the parking areas, structures, water systems, and wastewater systems. Facility ventilation, accessibility, and site amenities were also issues identified at the site. Of the rest areas in Montana, the Jefferson City southbound and northbound sites had the 5th and 7th lowest health index scores, respectively, due to these factors. Additionally, the facilities are not compliant with Americans with Disabilities Act accessibility requirements and have continued to deteriorate in recent years. A substantial capital investment would be required to address the identified deficiencies.

Needs and Objectives

The Montana Department of Transportation has defined a need to address the existing Jefferson City Safety Rest Area northbound and southbound sites. The current facilities are open seasonally from April 15 through November 15 to the public pending the outcome of this study.

To optimize Safety Rest Area Program investment strategies, MDT sought an alternative that accomplishes the following objectives.

- Minimizes capital and long-term maintenance costs.
- Leverages federal-aid funding and reduces demands for limited state funding.
- Minimizes impacts to physical, biological, and social/cultural resources which could result in costly and time-consuming mitigation and abatement activities.
- Provides safe stopping opportunities spaced by a maximum of approximately one hour of travel time.
- Accommodates public and stakeholder feedback regarding stopping and parking opportunities.
- Aligns with existing MDT plans, policies, and asset management strategies.
- Adheres to Federal Highway Administration rules, regulations and guidance regarding the operation, maintenance and abandonment of Safety Rest Area facilities.

Public and Stakeholder Involvement

Stakeholder Interviews

Representatives from the Motor Carriers of Montana, Helena Tourism Alliance, Jefferson County Commissioners, Silver Bow County Commissioners, Jefferson County Planning, Lewis and Clark County Planning, Montana Department of Commerce, and the Montana Office of Tourism and Business Development participated in interviews conducted in May 2019. Collectively, interview participants expressed:

- Awareness of the safety benefits of truck parking areas
- Recognition of the corridor's importance for year-round commercial and tourism activities.
- Support for maintaining a truck parking area at the existing Jefferson City northbound and southbound sites to perpetuate safe stopping opportunities.
- Rejection of full closure of the Jefferson City facilities.

Alternatives

MDT considered two action alternatives to achieve identified objectives for the existing northbound and southbound Jefferson City Safety Rest Area sites.

Alternative 1: Reduction of Service

In accordance with MDT's *Safety Rest Area – Reduction of Service* memorandum, this alternative would lessen the current functionality of the existing northbound and southbound Jefferson City Safety Rest Area sites. The reduced service facilities would provide the function and features of a typical truck parking site. The alternative would entail maintaining entrance/exit ramps and parking areas; removing building facilities and foundations; filling wastewater tanks; capping associated wastewater piping; decommissioning drainfields; maintaining wells for irrigation and cleaning use; installing vaulted toilets; adding truck parking (southbound only); potential removal of picnic areas, pet amenities, and adjacent walkways; upgrading remaining sidewalks to meet Americans with Disabilities Act requirements; and reseeding reclaimed areas.

Capital and Maintenance Costs

- Initial capital costs would be higher compared to Alternative 2 (\$357,000 vs. \$292,000 for the northbound, and \$717,000 vs \$222,000 for the southbound). Long-term maintenance costs would be higher (at approximately \$10,000 annually per site or \$248,000 totaled over 20 years, assuming 2% inflation) compared to Alternative 2 (no long-term maintenance costs).

Funding Eligibility

- The reduction in service alternative would be eligible for federal funding because it would continue to provide safe stopping opportunities with parking and vaulted toilet services.

Environmental Risk

- No adverse permanent impacts to prime farmland, geologic resources, surface water, Total Maximum Daily Loads, wild and scenic rivers, wetlands, irrigation, floodplains and floodways, air quality, vegetation, noxious weeds, general wildlife species, threatened and endangered species, species of concern, and special status species, demographics, economic conditions, land use, recreational resources, cultural resources, noise, or visual resources are anticipated.

Spacing and Corridor Needs

- A truck parking area at Jefferson City Safety Rest Area would provide additional safe stopping opportunities.

Public/Stakeholder Feedback

- Public and stakeholder sentiment generally supports maintaining the existing Jefferson City northbound and southbound sites as truck parking areas to perpetuate MDT's investment and provide safe stopping/parking opportunities in the study area.

Alignment with MDT Plans

- Alternative 1 aligns with network evaluation guidelines outlined in the *Montana Rest Area Plan* and would provide continued investment in safe stopping opportunities as outlined in *TranPlanMT* and the *Montana Freight Plan*.

Additional Requirements

- This alternative would not be considered a form of abandonment because it would continue to provide a safe stopping opportunity with parking and vaulted toilet services. Therefore, a supplemental evaluation (justification of abandonment) would not be required to be submitted to the Federal Highway Administration.

Alternative 2: Closure

The second alternative would involve complete demolition of the northbound and southbound building facilities, parking areas, ramps, water/wastewater systems, and site amenities. Under this scenario, the entire site would be reclaimed and reseeded.

Capital and Maintenance Costs

- Initial capital costs would be lower compared to Alternative 1 (\$292,000 vs. \$357,000 for the northbound, and \$222,000 vs. \$717,000 for the southbound). Long-term maintenance costs would be eliminated.

Funding Eligibility

- The cost of safety rest area closures (abandonments) are not eligible for federal-aid funding. Consequently, this alternative would need to be conducted entirely with state funds.

Environmental Risk

- No adverse permanent impacts to prime farmland, geologic resources, surface water, Total Maximum Daily Loads, wild and scenic rivers, wetlands, irrigation, floodplains and floodways, air quality, general wildlife species, threatened and endangered species, species of concern, and special status species, demographics, economic conditions, land use, recreational resources, cultural resources, noise, or visual resources are anticipated.
- Alternative 2 has a greater environmental risk due to increased potential to encounter contaminated soils and greater likelihood of noxious weed establishment (with all other potential risks equal to Alternative 1).

Spacing and Corridor Needs

- Complete closure would reduce parking and stopping opportunities in the study area. During peak usage periods, parking options along this corridor would be reduced.

Public/Stakeholder Feedback

- Public and stakeholder sentiment generally opposes complete closure of the Jefferson City sites.

Alignment with MDT Plans

- Although closure of the Jefferson City Safety Rest Area would follow guidelines outlined in the *Montana Rest Area Plan*, it would not provide continued investment in safe stopping opportunities as stated in *TranPlanMT* and the *Montana Freight Plan*.

Additional Requirements

- Alternative 2 triggers a Federal Highway Administration requirement that MDT perform a supplemental evaluation to demonstrate adequate safety rest area services remain after the abandonment of the Jefferson City Safety Rest Area sites. It is unlikely that MDT could provide adequate justification for Alternative 2 based on truck parking and facility demands along the Interstate 15 corridor between the Helena and Butte Urban Areas.

Conclusions and Recommendations

Based on the analysis conducted for this study, Alternative 1 (reduction in service) is the preferred alternative for the following reasons:

- Existing facilities are not sufficient to address truck parking needs during peak usage periods (summer months) along this portion of the I-15 corridor.
- Alternative 1 (reduction in service) would continue to provide additional stopping opportunities along this corridor.
- Stakeholder groups expressed support for safe stopping/truck parking opportunities at the Jefferson City Rest Area site.
- Stakeholder groups rejected Alternative 2 (closure option) for the Jefferson City Rest Area site.
- Stakeholder and public comments supported the reduction of service option versus the closure option.
- Alternative 1 (reduction of service) is eligible for federal-aid funding and requires no state matching funds for site improvements.
- Alternative 2 (closure option) must be funded entirely with state funds (not federal-aid eligible).
- While maintenance costs are higher for Alternative 1 (reduction of service), the total amount of state funds required to implement Alternative 1 are comparable to Alternative 2 (closure option).
- Alternative 2 (closure option) triggers a Federal Highway Administration requirement that MDT perform a supplemental evaluation to demonstrate adequate safety rest area services will remain after the abandonment of the Jefferson City Safety Rest Area site.
- It is unlikely that MDT could provide adequate justification for Alternative 2 (closure option) based on truck parking and facility demands along this portion of the I-15 corridor.

Consequently, this study recommends implementation of Alternative 1 (reduction of service) at the Jefferson City Safety Rest Area sites.

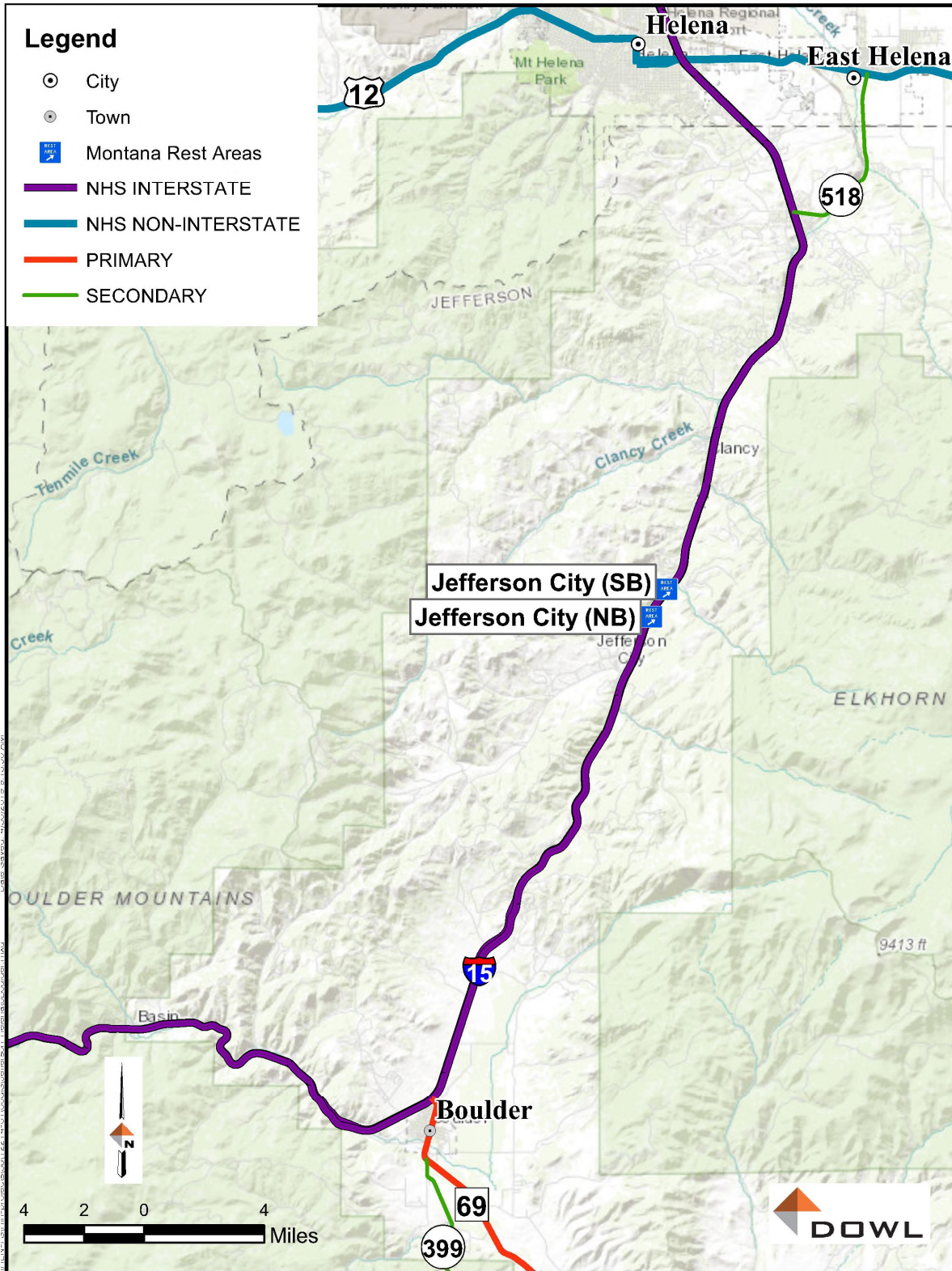
1.0 INTRODUCTION

The Montana Department of Transportation (MDT) conducted a rest area study to evaluate two alternatives for the Jefferson City Safety Rest Area: (1) reduction in service and (2) complete closure of the site. The 2019 Rest Area Plan Health Index Update identified several potential concerns at the Jefferson City Safety Rest Area relating to the number of truck parking spaces and the remaining service life for the parking areas, structures, and wastewater systems. Facility ventilation, accessibility, and site amenities were also issues identified at the sites.

Of the rest areas in Montana, the Jefferson City southbound and northbound sites had the 5th and 7th lowest health index scores, respectively, due to these factors. Additionally, the facilities are not compliant with Americans with Disabilities Act (ADA) accessibility requirements and have continued to deteriorate in recent years. A substantial capital investment would be required to address the identified deficiencies.

Figure 1 illustrates the Jefferson City Safety Rest Area location in reference to the communities of Boulder, Butte, and Helena along Interstate 15 (I-15). Network spacing criteria from the Montana Rest Area Plan characterized the Jefferson City Safety Rest Area as potentially redundant due to its proximity to Helena (approximately 15 miles to the north), Boulder (approximately 13 miles to the south), and Butte (approximately 50 miles to the south).

Figure 1: Study Area



Source: DOWL 2019

2.0 EXISTING CONDITIONS ANALYSIS

The following sections provide a summary of the Jefferson City Safety Rest Area features and characteristics to identify opportunities, constraints, and needs within the study area. The analysis is based on existing site-specific data, publicly available data, and information gathered during site visits conducted on October 19, 2017, June 1, 2018, and May 10, 2019. Photographs from the site visit are catalogued in Appendix A.

2.1 Network Spacing and Demand

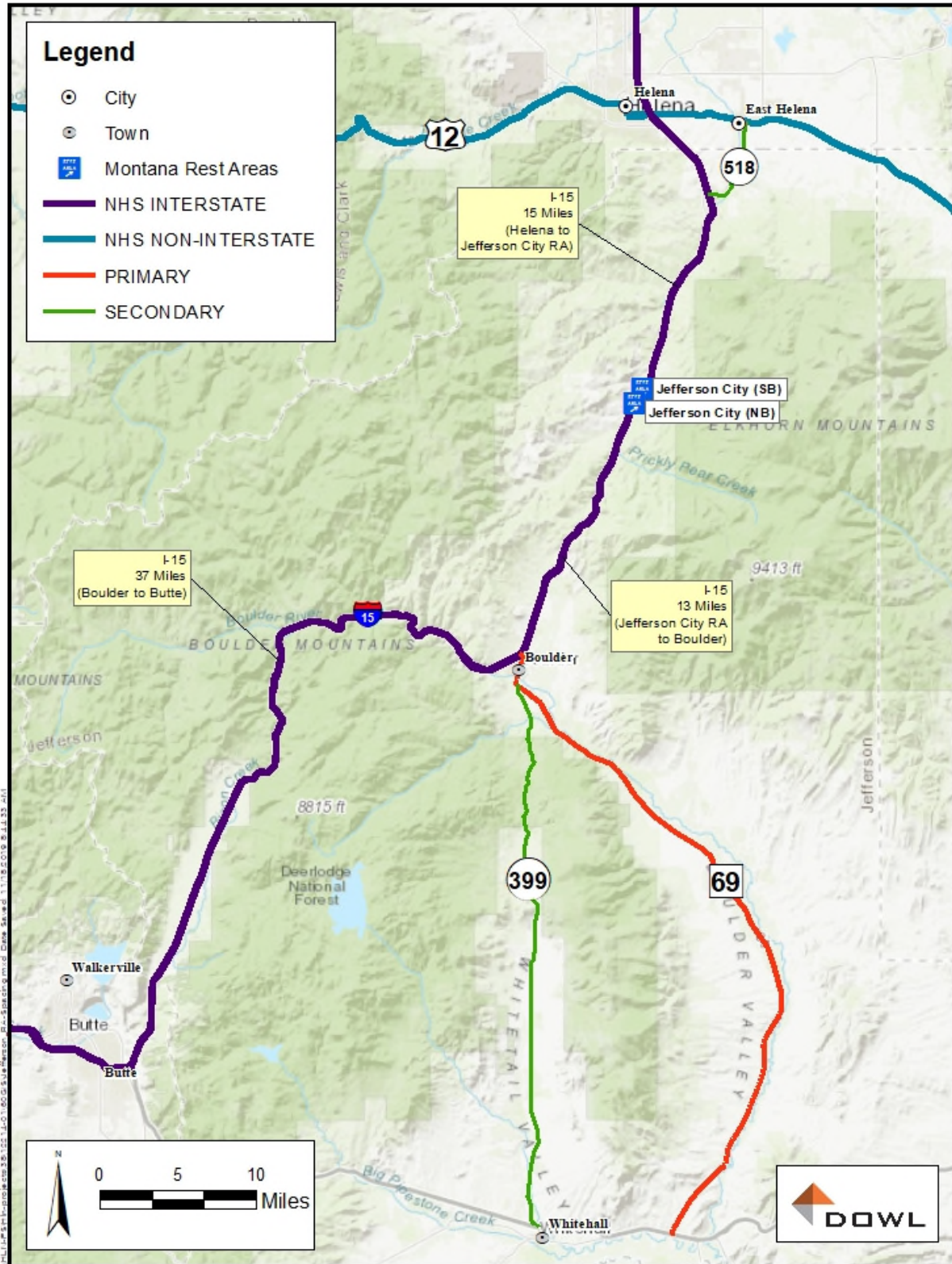
Spacing

The Montana Rest Area Plan recommends approximately one hour of travel time between safety rest areas. This generally equates to a distance of approximately 70 miles on Interstate facilities. Table 1 and Figure 2 provide a summary of spacing distances between safety rest areas, truck parking areas, urban areas, and other key locations in the vicinity of the Jefferson City Safety Rest Area. The analysis considers spacing only along the Interstate 15 corridor from the Helena to Butte urban areas. Boulder is not a designated urban area; however, is included in the analysis as a key stopping location along this portion of the I-15 corridor with at least one commercial establishment with 24-hour services. Currently, the Jefferson City Safety Rest Area operates as a seasonal facility.

Table 1: Jefferson City Safety Rest Area Spacing Analysis

Beginning Location	Ending Location		
	Helena (Urban Area)	Jefferson City Rest Area	Boulder (Other)
Jefferson City Rest Area	15 miles		
Boulder (Other)	28 miles	13 miles	
Butte (Urban Area)	65 miles	50 miles	37 miles

Figure 2: Jefferson City Safety Rest Area Spacing Analysis



Source: DOWL 2019

Key findings regarding spacing between stopping opportunities are summarized below.

- The distance from the existing Jefferson City Safety Rest Area to Helena and Butte is 15 and 50 miles respectively, indicating the Jefferson City Safety Rest Area is a redundant stopping point along Interstate 15 per the 2014 MDT Rest Area Plan.

Parking Demand

The American Association of State Highway and Transportation Officials (AASHTO) *Guide for Development of Rest Areas on Major Arterials and Freeways* (1999) provides recommendations for estimating safety rest area usage based on national trends. MDT initiated a research project with the Western Transportation Institute (WTI) to develop guidelines that more accurately reflect conditions specific to Montana. The project culminated in completion of the *Rest Area Use: Data Acquisition and Usage Estimation Report* (2011). The goal of the WTI report was to investigate some of the variables thought to affect safety rest area usage and identify patterns at select study sites for application at all state-maintained safety rest areas in the absence of site-specific data.

Using these publications as a foundation, MDT developed a modified demand methodology in the *Montana Rest Area Plan* (2014) to reflect site-specific door count data in place of assumed stopping percentages to identify peak-hour visitation at MDT safety rest areas. In 2019, MDT further evaluated demand calculations in an effort to improve accuracy. It was determined that annual peak door count did not best represent daily patron usage. This effort found that 90th percentile door count data provided a better representation of patron usage for parking demand calculations¹.

Similar to the 2019 Rest Area Health Index update, this study uses the most current traffic volumes and door count data to calculate updated parking demands at the Jefferson City Safety Rest Area. Following the methodology outlined in the *Montana Rest Area Plan*, Table 2 presents a summary of the parking demand analysis conducted for the study area. Parking demand calculations are provided in Appendix B.

Table 2: Parking Demand Analysis

Parking Spaces		Jefferson City Safety Rest Area (NB)	Jefferson City Safety Rest Area (SB)
Passenger Vehicles	2018 Supply	11	9
	2018 Demand	1	1
	2018 Deficiency/Surplus	10	8
Truck	2018 Supply	8	0*
	2018 Demand	4	4
	2018 Deficiency/Surplus	4	- 4

Source: DOWL 2019. Demand calculations for Jefferson City. *The 2019 Rest Area Plan Health Index Update notes 4 truck parking spaces at the southbound site; however, the current truck parking area is not a standard configuration that allows for adequate turning movements; therefore, zero spaces were used for this analysis.

¹ 2019 Rest Area Plan Health Index Update, Parking Demand Calculations used 2016 traffic volume and door count data.

According to the calculations, the Jefferson City Safety Rest Area does not have adequate truck parking on the southbound site with a deficiency of four truck parking stalls.

2.2 Water Rights and Water Systems

Water Rights

The northbound rest area has an onsite well which is used at the facility for a potable water and irrigation water supply. MDT filed and received an exempt groundwater well water right with a priority date of June 26th, 2019 for the seasonal water use at the northbound facility. The water right is limited to a maximum flow rate of 30 gpm and maximum volume of 2.25 ac-ft. The groundwater right on file with the State of Montana Department of Natural Resources and Conservation (DNRC) is number 411 30128693.

The water right for the southbound rest area is a seasonal well groundwater right for both institutional (domestic) and irrigation use. The groundwater right on file with the DNRC is number 411 96195-00 with a priority date of October 18, 1995. The water right is seasonal, with a maximum flow rate of 35 gallons per minute (gpm) and an annual maximum volume of 5.52 acre-feet. Table 3 further describes the water rights at the northbound and southbound facilities, also included in Appendix C.

Table 3: Rest Area Water Right

Location	Water Right Number	Owner	Purpose	Quantity	Timeframe
Northbound	411 30128693	Montana Department of Transportation	Other Purpose	30 gpm / 2.25 ac-ft	April 1 to November 30
Southbound	411 96195-00	Montana Department of Transportation	Institutional	35 gpm / 0.52 ac-ft	May 15 to October 15
			Lawn and Garden	35 gpm / 5.0 ac-ft	May 15 to October 15

Source: State of Montana Department of Natural Resources and Conservation, Water Right Query System.

Water Supply and Well Data

Both the northbound and southbound sites are considered transient, non-community public water supply system (PWS) as they serve 25 or more persons per day, although the same persons are not regularly served for at least six months a year. The northbound and southbound sites are located in a heavily dredged section of the Prickly Pear Creek drainage.

Northbound (PWSID# MT0001952)

The northbound site does not have a well log on file with Montana’s Groundwater Information Center (GWIC). The Source Water Delineation and Assessment Report (SWDAR), prepared by CDM June 2010, states that the facility’s previous SWDAR identified the well as a 6-inch well installed in 1971 and cased to 50 feet below the ground surface (bgs), with a total depth of 65 feet bgs. The well is located approximately 20 feet southeast of the facility building. The SWDAR (2010) identifies the well source water in an unconfined aquifer within the fractured bedrock underlying heavily dredged gravel/boulders.

At a site visit by DOWL on October 19, 2017, the groundwater surface in the well was measured using a water level measuring probe at approximately 20.7 feet bgs. Additionally, the well casing

was observed to be rusted and red stains were present on the plumbing fixtures. The well pump and pressure tanks were approximately two to three years old at the time of the site visit.

During the rest area's operational season, the water supply source is sampled for coliform and e-coli monthly and nitrate-nitrites annually. According to Montana Department of Environmental Quality (MDEQ) Drinking Water Watch, six (6) violations occurred in the last five years. Of these, two were related to positive tests for the presents of coliform, and the other violations were related to system monitoring/reporting requirements. The measured nitrate+nitrite levels have been below the state maximum contamination level (MCL) of 10 parts per million (ppm).

Overall, the northbound water supply well is in fair condition and could be used for irrigation purposes only. If MDT were to perpetuate the well for public use, MDEQ may require an updated water supply plan and additional treatment based on the depth to groundwater and possible surface/groundwater connection. If the well is relocated, it would need to be reconstructed to current MDEQ public water supply standards.

The SWDAR (2010) and water quality testing results for the northbound facility are included in Appendix C.

Southbound (PWSID# MT0002591)

The existing water supply well at the southbound site was installed in 1995 (GWIC # 153901). According to the well log, the well is completed to a depth of 245 feet bgs with a bentonite seal to 20 feet bgs, 6-inch steel casing to 50 feet bgs, 4-inch screen from 120 to 245 feet bgs, and a water surface elevation 40 feet bgs. The SWDAR prepared by Territorial Landworks Inc. in May 2012 identified the well source water in a confined/semi-confined aquifer with in fractured bedrock 40 to 245 feet bgs.

At a site visit by DOWL on June 1, 2018, the well casing was observed to be rusted and red stains were present on the plumbing fixtures. The well pump and pressure tanks were approximately two to three years old at the time of the site visit.

During the rest area's operational season, the water supply source is sampled for coliform and e-coli monthly and nitrate-nitrites annually. According to MDEQ Drinking Water Watch, two (2) violations occurred in the last five years which were related to system monitoring/reporting requirements. The measured nitrate+nitrite levels have been below the state maximum contamination level (MCL) of 10 ppm.

Overall, the southbound water supply well is in good condition and could be used for consumption and irrigation purposes. If MDT were to make improvements to the water system, MDEQ may require an updated SWDAR and additional treatment based on site conditions. If the well is relocated, it will need to be reconstructed to current MDEQ public water supply standards.

The well log, SWDAR (2012), and water quality test results for the southbound facility are included in Appendix C.

2.3 Public Wastewater Systems

The northbound and southbound rest area sites each use a conventional gravity septic and drainfield system for wastewater treatment. There are no records on file with the Jefferson County Health Department related to the wastewater system; therefore, it is assumed the systems were installed in 1972 with the facility construction. Originally the systems treated

wastewater from the restrooms and a RV septic dump station; however, the septic dump station has been abandoned. MDT Maintenance staff indicated that the systems function as intended with the only system maintenance of pumping of septic tanks up to two times per year. The wastewater treatment systems each consist of a dual compartment septic tank and a gravity drainfield of five laterals 100 feet in length. Based on the site soil conditions, heavily dredged gravel/boulders, each wastewater system is estimated to have a design system capacity of 1,200 gallons per day (gpd).

five laterals at 100 ft = 500 lf of laterals
Assume 3.0 ft wide trench; 3.0 ft x 500 ft = 1,500 ft² drainfield trench
Assume application rate of 0.8 gpd/ft²; 0.8 gpd/ft² x 1,500 ft² = **1,200 gpd**

The 2019 MDT Rest Area Plan Health Index Update used the Modified WTI Method to calculate the estimated rest area usage for the northbound and southbound sites based on average annual daily traffic counts. As described in the Parking Demand section 2.1 above, supplemental door counts were provided for the Jefferson City facilities which tend to be a more representative of the actual facility usage. From the door count data, the average summer rest area usage is estimated at 116 and 103 people per day for the northbound and southbound facilities respectively. To determine the theoretical existing peak seasonal wastewater loading at the facilities, a 2.5 peaking factor (average day to peak day) and an estimated water usage of 1.5 gallons per user were applied using the higher usage rate.

116 people per day x 1.5 gallons per user x 2.5 peaking factor = **435 gallons per day**

At the above estimated existing system design capacity and estimated peak seasonal flow, the existing systems are operating within their design hydraulic capacity. To determine the actual rest area wastewater loading, the facility's historical peak door counts, or water usage meter records should be analyzed to more accurately represent the facility system usage.

Northbound

The northbound wastewater treatment system is located approximately 350 feet northeast of the rest area facility. The transport pipe from the building to the septic tank has three cleanouts with broken or missing caps. The septic tank and drainfield are located in a depressed ground surface area which has the possibility for surface water ponding. State Highway 282 is located between the septic system and Prickly Pear Creek, approximately 150 feet east of the of the septic system.

Southbound

The southbound wastewater treatment system is located approximately 200 feet northeast of the rest area facility. The septic tank and drainfield are in an area where the ground surface is slightly depressed which may lead to the influence of surface water on the wastewater system. A surface water pond with seasonal standing water is located approximately 100 feet northwest of the wastewater system.

Summary

Overall, the wastewater systems at both rest area facilities are in fair condition with no major operational concerns based on the existing facility usage. The wastewater systems are beyond a typical system's useful life as they are estimated to be 47 years old at the time of this evaluation (1972 to 2019). Due to the age of the wastewater system, and projected growth of the I-15 corridor, the wastewater system would need to be replaced if the rest area facilities were to be improved or expanded in the future.

If MDT were to perpetuate the public wastewater systems at these sites in the future, the following issues must be addressed:

- With rest area improvements along the interstate's corridor, MDT has observed increased water usage on newly constructed and improved rest areas. Any improvement to the facility should incorporate an estimated usage design flow of 2.5 gallons per user.
- Improvements to the rest area wastewater system should incorporate a projected growth rate for sizing the system with a 20-year design life.
- If the rest areas were to be improved or expanded the wastewater systems should be reconstructed to the current MDEQ regulations. Below is a list of wastewater system siting requirements which may be challenging at the Jefferson City rest area sites:
 - 100-foot setback to drinking water wells.
 - 500-foot mixing zone.
 - 100-foot setback from surface water.
 - 100-foot setback from 100-year floodplain.
 - 25-foot setback to stormwater pond/ditch.
- A 100% replacement drainfield area, without reductions for level of treatment or gravel-less trenches, is required for all new or expanded subsurface absorption systems.
- A non-degradation analysis for nitrate sensitivity and phosphorous breakthrough would be necessary at each site. The proximity to surface water, groundwater, site soil conditions, and typical high nitrate concentrations in rest area wastewater streams may make it difficult to pass MDEQ's non-degradation analysis if the facilities are improved or expanded.

Preliminary wastewater system sizing calculations are attached in Appendix D.

2.4 Building Structure

The Jefferson City northbound and southbound buildings were originally constructed in 1972. In 2019, the estimated remaining service life of the structures is three years based on a 50-year design life. Record drawings for the safety rest area structures are provided in Appendix E for reference. The following statements reflect visual observations from the October 2017, June 2018, and May 2019 site visits.

- The buildings were generally in sound structural condition. Minor cracking and separation occur in the exposed portion of the exterior foundation stem walls.
- Exterior siding and roof were in relatively good condition. Observations from inside the buildings indicate no discernable signs of leaks.
- At each site, ceramic tiles on the restroom floors were worn, cracked, and in poor condition.
- At each site, the timber framework along the base of the interior plumbing chase shows signs of water damage. In some areas, there was evidence of previously leaking interior plumbing that has been repaired.
- Restrooms at both the southbound and northbound sites generally appeared clean and maintained; however, existing ventilation features do not adequately address noticeable odors.
- Asbestos was not found in any of the suspect materials sampled and analyzed during the May 2019 investigation.
- Lead paint was not detected on identified painted building components tested at each rest stop area; however, was detected on the blue parking curbs in the handicap parking stalls at each site.

2.5 Ramps and Parking Areas

The following section summarizes visual observations of the Interstate 15 entrance/exit ramps and parking areas to identify the general condition of the pavement surface and other associated site features. A copy of the record drawings showing the original construction alignments, profiles and layouts for the ramps and parking areas is provided in Appendix E for reference.

Pavement Section

Original pavement sections of the northbound and southbound ramps and parking areas were not included with the record drawings that were provided by MDT. Therefore, the existing pavement thicknesses were not identified.

Ramps and parking areas were originally constructed between 1971 and 1972. Data provided by MDT shows that the ramps and parking areas underwent either reconstruction or rehabilitation upgrades in 1998. As of 2019, the service life of the pavement has been exceeded by 1 year based on a 20-year design life since the last rehabilitation.

The Jefferson City Safety Rest Area has been operating as a seasonal facility. Further investigative testing may be warranted to more accurately assess the existing pavement sections. Testing could include coring samples to verify depths and materials of the existing pavement section as well as verification of subgrade soils to better evaluate remaining pavement service life.

Surface Condition

Based on visual observation, the surface of the pavement appeared to be in relatively good condition with only some minor signs of wearing surface aggregate loss. Significant rutting and cracking did not appear to be evident in the pavement areas. The overall structural integrity of the pavement is not included as a part of this existing conditions assessment.

The original northbound and southbound parking areas were constructed with isolated paved areas for trailer dump sites. The paved areas still exist, but the sanitary disposal stations appear to have been abandoned during the 1981 rest area “handicap renovation” improvements and are no longer in service. No signs of pavement distress were identified in the areas of the original disposal stations.

If minor pavement rehabilitation is considered for future improvements, any existing cracks would need to be sealed before rehabilitation occurs.

Drainage Patterns

Ponding water and poor drainage can have a negative impact on pavement conditions. Pavement exposed to ponding water deteriorates at a faster rate and becomes brittle. As a result, small fractures occur in the surface and become vulnerable to repeated exposure to moisture, debris, and vehicle forces. As the deterioration worsens, larger cracks appear and allow the foundation to become susceptible to the damaging effects of water. The following section summarizes visual observations of general drainage patterns for the ramps and parking areas.

Northbound

Record drawings indicate the northbound parking area has positive longitudinal grade for the length of the site, which is consistent with observations during the site visit. The longitudinal

grade through the parking area is approximately -1.2% (south to north) per the record drawings. The passenger vehicle parking area is constructed with pin down curb adjacent to sidewalk that is at-grade with the pavement surface. Surface water runoff from the normal crown pavement section collects along the face of the pin down curb and flows northerly until it crosses the sidewalk at a location where the pin down curb has been removed. If the parking area is to be perpetuated with future improvements, consideration should be made to remove the existing pin down curb and adjacent sidewalk, and replace it with standard curb, gutter and sidewalk. A curb cut would likely be needed to provide an outlet for water that collects along the gutter and conveyed through the passenger vehicle parking area. The northbound exit and entrance ramps have positive cross slopes that allow for adequate pavement surface drainage.

Southbound

Record drawings indicate the southbound parking area has positive longitudinal grade, which is also consistent with observations during the site visit. The longitudinal grade through the parking area is approximately -1.3% (south to north) per the record drawings. The passenger vehicle parking area is constructed with pin down curb next to sidewalk that is at-grade with the pavement surface. Surface water runoff from the normal crown pavement section collects along the face of the pin down curb and flows northerly to a point where it collects in the northeast corners of the passenger vehicle parking areas. There is no existing dedicated outlet location for the surface water to discharge. The runoff eventually dissipates through the gaps in the pin down curb joints where it flows across the sidewalk and away from the pavement surface. If the parking area will be perpetuated with future improvements, this analysis recommends considering removing the existing pin down curb and adjacent sidewalk and replacement with standard curb, gutter and sidewalk. A curb cut would likely be needed to provide an outlet for the water that is collected and conveyed by the curb and gutter through the passenger vehicle parking area. The southbound exit and entrance ramps have positive cross slopes that allow for adequate pavement surface drainage.

Curbing

Both the northbound and southbound rest area sites were constructed with pin-down curb along the eastern edge of the passenger vehicle parking areas creating a separation between the parking areas and the adjacent sidewalk. A majority of the pin-down curb for each site is deteriorating and becoming dislodged. Sections of the pin down curb have also been removed to provide access to the adjacent sidewalk, as there are no existing curb ramps at the sites due to the sidewalk being at-grade with the parking pavement surface.

The median curbing at the northbound site creates turning constraints for parked trucks, especially at the northernmost median area. Additionally, the proximity of the pin down curb that borders the exhibit area “bulb out” along the eastern edge of the parking area compounds the pinch point for turning trucks. Visual observations indicate that the median curb and pin down curb in this location are frequently hit and traversed by turning trucks. If the parking area will be perpetuated with future improvements, consideration should be made to remove the median curbing (and pave the existing medians) to potentially improve turning restrictions for parked trucks and to also allow for easier snow plowing during winter months, if applicable.

Striping

The striping appeared to be in relatively good condition as observed on the May 2019 site visit. The truck parking stall widths at the northbound site are generally striped less than the standard 15-foot width per the MDT Traffic Manual. If the northbound parking area will be perpetuated with future improvements, consideration should be made to stripe the truck stalls to meet the

standard 15-foot width. There were no truck stall markings at the southbound site since this site was designed for trucks to park along the outside edge of the pavement where the pavement width accommodates parked trucks and through vehicle movements. The passenger vehicle parking stall widths for both the northbound and southbound sites generally met the standard 10-foot criteria. ADA parking requirements are addressed separately in Section 2.7.

Signage

Ramp and parking area signage range from good to fair condition. At both sites, the “Wrong Way” and “Do Not Enter” signs were installed in 2014. The majority of the other road signs along the sites were installed between 1996 and 1998. The signs are generally in good condition with some signs of wear.

2.6 Site Amenities

The following section summarizes the general condition of exterior site amenities observed during the May 2019 site visits. Record drawings showing the original construction of the picnic shelters, exhibit cases, and picnic tables are provided in Appendix E for reference.

Picnic Areas

Picnic facilities at both sites include roofed picnic shelters containing table/bench units with either concrete bases and tops, or wood bases and plank tops served by adjacent concrete walkways.

Concrete picnic tables were generally in sound structural condition. The concrete table and bench supports did not show evidence of significant cracking. The wood plank table tops and bench seats were chained down to the concrete slabs. The paint on a majority of the wood planks were showing significant signs of chipping and peeling with signs of aging or water damage.

Metal shelter roofs appeared to be in general good condition. Picnic shelters were in sound structural condition; however, some of the base plate and side plate roof post connections were rusty and showing signs of deterioration. Picnic shelter construction consists of a four-inch concrete slab with two-foot square by three-foot deep footings for the roof posts. Some cracking was observed in the concrete slabs; however, slabs were in good/fair condition.

Informational Signage

Signage was generally in fair condition with some cases in poor condition, including informational and historical site markers. These features exhibited chipping/peeling paint, faded/worn marker text, damaged display cases, and rusting post connections.

Pet Areas

Both sites have an unfenced pet area designated by signage. Pet areas are generally located along the ramps within drainage swales. Moving pet areas to new locations may be warranted should MDT choose to maintain the sites as truck parking areas. New pet area locations may allow the opportunity to provide a greater buffer between the pet area sites, traffic movements, and environmentally sensitive areas.

Benches

The southbound site provides one freestanding bench not associated with picnic areas. The metal connections of the wooden benches generally were in sound structural condition. However, vertical timber posts were faded, and the paint was chipping and peeling. The wood slats were beginning to splinter and are in need of replacement. No freestanding benches were located at the northbound site.

Light Fixtures

Exterior pole-mounted light fixtures are a combination of the original mercury vapor luminaires (southbound only) or recently upgraded LED luminaires, (northbound only) on 30-foot poles. The 30-foot-high poles were generally located along the edges of the parking area; poles and luminaires were in good condition. The operational condition of the lights is not included as part of this existing conditions assessment.

2.7 Accessibility

The following section summarizes exterior feature compliance with ADA and associated implementing guidelines and standards. Accessibility of building facilities is not included, as these are anticipated to be demolished under both action alternatives considered for this study. Appendix F includes measurements and mapping showing measurement locations.

Pedestrian Ramps

The asphalt pavement parking areas and sidewalks at the northbound and southbound sites are at the same vertical elevations; therefore, there are no pedestrian ramps transitioning from the parking area to pedestrian access routes. Additionally, there are no pedestrian ramps leading to site facilities.

Accessible Parking Spaces

Section 208.2 of the 2010 ADA Standards requires at least one accessible parking space for parking areas providing up to 25 total parking spaces. For every six or fraction of six accessible parking spaces, at least one must be a van parking space. Field observations identified the following characteristics.

- The northbound rest area has 13 total passenger vehicle spaces, including two accessible parking space, one of which is accessible van parking space, in compliance with Section 208.2 of the 2010 ADA Standards. The accessible van parking space is not compliant due to access aisle running slope in excess of the 4% maximum allowable slope. The other accessible parking space is compliant according to the 2010 ADA Standards.
- The southbound rest area has 10 total passenger vehicle spaces, one of which is one accessible van parking space, in compliance with Section 208.2 of the 2010 ADA Standards. The parking space and access aisle slopes and cross-slopes exceed the maximum 2% slope requirement for an accessible parking stall.

Picnic Areas

Both northbound and southbound sites provide two picnic shelters each containing two concrete table/bench and two wood table/bench units with adjacent pedestrian access routes. Only one of the four picnic table/bench units located within each picnic shelter serves adjacent pedestrian

access routes. The remaining three picnic table/bench units do not provide sufficient clear space to navigate; therefore, are not included in this assessment.

According to the final rule on outdoor developed areas (36 CFR part 1191, Appendix C, Section F245), for sites providing more than two picnic areas, 20 percent (and not less than two) must be accessible. Picnic areas are considered non-accessible due to inadequate clear space on all usable sides of the table/bench by not providing wheelchair space with knee and toe clearance.

Benches

One freestanding bench constructed with wooden 4-inch by 4-inch legs and wooden slat seats is provided at the southbound site. These features are not compliant with requirements outlined in the 2010 ADA Standards for the following reasons.

- Bench seat size does not meet the minimum standard.
- Bench seat height does not meet the minimum standard.

Pedestrian Access Routes

Concrete sidewalks traverse the northbound and southbound sites providing access to building facilities and picnic areas. Concrete walkways are spalling in some locations and significant heaving and uplifting occurs along numerous stretches of walkways creating vertical discontinuities and trip hazards at both sites.

Measurements reflect the most direct access route to the building pad and picnic shelters at approximately 20-foot intervals. The assessment included the following:

- Of the 25 access route measurements collected at the northbound site, 14 are noncompliant due to trip hazards, vertical slopes, cross slopes, and insufficient clear width due to narrow sections or overgrown vegetation.
- Of the 26 access route measurements collected at the southbound site, 22 are noncompliant due to trip hazards, vertical slopes, cross slopes, and insufficient clear width due to narrow sections or overgrown vegetation.

In May of 2019, MDT completed concrete patching and grinding along the pedestrian routes to remove vertical surface discontinuities; however, the majority of the pedestrian access routes are considered non-compliant.

2.8 Safety Rest Area Maintenance

MDT Maintenance staff indicated that the majority of historical maintenance efforts have been related to preparation work for seasonal opening. Pre-season maintenance efforts have typically included painting, tree trimming, cleaning roof gutters, septic tank pumping, and overall site cleanup to address fallen tree limbs, animal waste, and garbage.

In addition to MDT Maintenance effort, contracted services provide custodial and upkeep assistance at rest areas and truck parking areas in order to maintain clean and safe stopping opportunities. Table 4 presents contracted services annual costs at the Jefferson City Safety Rest Area and several truck parking areas throughout the state.

Table 4: Jefferson City and Truck Parking Contracted Maintenance Costs

	Site	Dates Open	Annual Cost	
Safety Rest Area	Jefferson City	April 15 – Nov 15	\$20,800	
Truck Parking Area	Lyons Creek	Year Round	\$29,500	Average \$16,300
	Livingston East	Year Round	\$12,300	
	Rock Creek	Year Round	\$12,600	
	Alberton	Year Round	\$12,600	
	Red Rocks	Year Round	\$14,600	
	Locate	April 1 – Nov 30	\$16,600	

2.9 Environmental Conditions

The following sections summarize existing environmental resource information within the study area gathered from previously published documents, websites, GIS data, and field site visits. The following environmental resources may pose potential constraints for future reduction in service or site closure.

- **Physical Resources:** Soil Resources and Prime Farmland, Geologic Resources, Surface Waters, Total Maximum Daily Loads, Wild and Scenic Rivers, Wetlands, Irrigation, Floodplains and Floodways, Air Quality, Hazardous Substances
- **Biological Resources:** Vegetation, Noxious Weeds, General Wildlife Species, Threatened and Endangered Species, Species of Concern, and Special Status Species
- **Social and Cultural Resources:** Demographics, Economic Conditions, Land Use, Recreational Resources, Cultural Resources, Noise, Visual Resources

Appendices G through N provide supporting environmental data.

Physical Resources

Soil Resources and Prime Farmland

The Natural Resources Conservation Service (NRCS) Web Soil Survey for both sites indicate the majority of soils are comprised of primarily alluvium material derived from granite, coarse-loamy residuum weathered from granite, and fine-loamy alluvium. All the soils identified within the sites are designated as either farmland of statewide importance or farmland of local importance; however, the majority of these soils have been previously developed.

Geologic Resources

Montana geological maps show surficial sedimentary deposits (Qs) make up both sites. These deposits include alluvium, fan, and terrace gravels; gravel deposits on pediment surfaces; landslide and travertine deposits (Pleistocene and Holocene); and till, glacial lake, and outwash deposits (Pleistocene). Surficial soils consist of sand, loam, gravel, and clay associated with granite and alluvium formation.

According to Montana Bureau of Mines and Geology mapping, no faults are mapped within or near the two sites. The sites are located within a Seismic Hazard Zone that is prone to strong ground motion; however, very few earthquakes have been documented in the area.

Surface Waters

One surface water, Prickly Pear Creek, occurs in the proximity of the northbound site (Figure 3). Prickly Pear Creek is a small, perennial riverine flowing northeast/southwest. Prickly Pear Creek eventually conveys to Lake Helena and the Missouri River, and is therefore, considered a jurisdictional water under the Clean Water Act (i.e., within the U.S. Army Corps of Engineers regulatory jurisdiction). Additionally, a small spring fed pond is located at the southbound site.

Figure 3: Wetlands and Waterways Within the Vicinity of The Study Area



Source: U.S. Fish, Wildlife and Parks NWI Mapping 2019; <https://www.fws.gov/wetlands/data/mapper.html>

Total Maximum Daily Loads (TMDL)

The northbound and southbound sites are located within the Lake Helena Watershed Planning Area. MDEQ lists Prickly Pear Creek in this area (MT411006_050) as impaired and not fully supporting drinking water, aquatic life, and cold-water fisheries. Additionally, the segment is listed as partially supporting agricultural uses. This segment of Prickly Pear Creek is impaired by sediment, cadmium, lead, and zinc. Roadway runoff and placement are primary contributors of sediment pollution in this segment. Other contributors include local grazing and placer mining activity. Metal sources in Prickly Pear Creek are expected to be from upstream and tributary streams and historic mining activities in the drainage area. TMDLs have not been completed; however, TMDLs are planned to be written for sediment, cadmium, lead, and zinc. Refer to Appendix I for the *Lake Helena Watershed Planning Area Final Report*.

Wild and Scenic Rivers

There are no wild or scenic rivers within or adjacent to the northbound or southbound sites. The closest wild and scenic river is the Flathead River, approximately 120 miles northwest of the southbound site.

Wetlands

The United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) mapping displays no wetlands at the sites. A potential small fringe, emergent wetland was identified around the small spring fed pond at the southbound site. The assessment did not include a wetland delineation or hydric soil/wetland boundary determination. Montana Natural Heritage Program (MTNHP) mapping includes forested riparian vegetation at the northbound site.

Irrigation

Based on aerial imagery, no irrigation ditches, canals, or other infrastructure were identified within or adjacent to either site.

Floodplains and Floodways

Federal Emergency Management Agency (FEMA) shows no floodplain mapping for this area.

Air Quality

The U.S. Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for six criteria pollutants, including carbon monoxide, nitrogen dioxide, ozone, particulate matter (PM10 and PM2.5), sulfur dioxide, and lead. The EPA designates communities that do not meet NAAQS as "non-attainment areas". The northbound and southbound sites are not located in a non-attainment area for any criteria pollutants. Additionally, there are no nearby non-attainment areas.

Hazardous Substances

Based on available MDEQ information, there are no underground storage tank (UST) sites, petroleum release fund claims, hazardous waste handler sites, abandoned or inactive mine sites, or open cut permits within or directly adjacent to the two sites. The National Pipeline Mapping System shows one pipeline designated as a gas transmission pipeline approximately 427 feet west of the southbound site. The pipeline travels north/south adjacent to I-15. The pipeline is designated as part of the East Helena-Boulder Line in the Northwestern Energy GT&S system and is owned by Northwestern Corporation (Figure 4).

Figure 4: East Helena – Boulder Gas Line



Source: National Pipeline Mapping System 2019; <https://www.npms.phmsa.dot.gov/>.

The hazardous materials assessment collected and tested building samples at both sites to determine the presence of asbestos-containing materials. Testing used polarized light microscopic (PLM) techniques with dispersion staining for identification of mineral forms of asbestos. Of the 10 representative samples collected at each site on May 10, 2019, no materials contain asbestos quantities.

The assessment also inspected painted and glazed surfaces for the presence of lead-containing materials using an x-ray fluorescence spectrum analyzer. Results indicate that only the blue painted parking curbs located in handicap parking stalls surfaces meet or exceed the federal threshold level of 1.0 milligram per square centimeter (mg/cm²).

Biological Resources

Vegetation

The Jefferson City Safety Rest Area is located within the Elkhorn Mountains-Boulder Batholith ecoregion of the Middle Rockies. This ecoregion is located on the Continental Divide and is composed of forested mountains and hills. Vegetation in the region is primarily subalpine fir and Douglas-fir forests.

Both sites are located within the Upper Prickly Pear Creek watershed. MTNHP mapping shows both sites are located on land cover designated as Human Land Use – Developed – Interstate. Land cover designations adjacent to the site include the following:

- Grassland Systems – Montane Grassland – Rocky Mountain Lower Montane, Foothill, and Valley Grassland
- Forest and Woodland Systems – Conifer-dominated forest and woodland (xeric-mesic) – Rocky Mountain Ponderosa Pine Woodland and Savanna
- Shrubland, Steppe and Savanna Systems – Sagebrush Steppe – Big Sagebrush Steppe
- Human Land Use – Developed – Low Intensity Residential
- Human Land Use – Developed – Open Space

Observed plant species at both sites include mature cottonwoods (*Populus sp.*), cottonwood saplings, smooth brome (*Bromus inermis*), common dandelion (*Taraxacum officinale*), ponderosa pine (*Pinus ponderosa*), common mullein (*Verbascum thapsus*), and Kentucky bluegrass (*Poa pratensis*). Vegetation directly surrounding the building structures includes landscape grasses and some ornamental plants.

Noxious Weeds

The Jefferson County Weed Management Plan 2016 (Appendix L) lists spotted knapweed (*Centaurea stoebe or maculosa*), leafy spurge (*Euphorbia esula*), houndstongue (*Cynoglossum officinale*), hoary alyssum (*Berteroa incana*), and Canada thistle (*Cirsium arvense*) as the most abundant noxious weed species in the county. Noxious weeds likely exist along the I-15 corridor bordering the sites.

General Wildlife Species

Mammals

Prickly Pear Creek, the surrounding riparian corridor, and the surrounding mountains provide suitable habitat for mammal species. According to the MTNHP database, mammal species include, but are not limited to, bobcat (*Lynx rufus*), elk (*Cervus canadensis*), mountain lion (*Puma concolor*), coyote (*Canis latrans*), mule deer (*Odocoileus hemionus*), montane vole (*Microtus montanus*), beaver (*Castor canadensis*), northern river otter (*Lontra canadensis*), black bear (*Ursus americanus*), and red squirrel (*Tamiasciurus hudsonicus*).

Amphibians and Reptiles

Amphibian species known to occur within the study area and vicinity include, but are not limited to, the Columbia spotted frog (*Rana luteiventris*), the long-toed salamander (*Ambystoma macrodactylum*), and western toad (*Anaxyrus boreas*). Reptile species such as common garter snake (*Thamnophis sirtalis*), gopher snake (*Pituophis catenifer*), northern rubber boa (*Charina bottae*), painted turtle (*Chrysemys picta*), and terrestrial garter snake (*Thamnophis elegans*) are likely to occur at both sites.

Birds

Prickly Pear Creek provides suitable riparian habitat for bird species in the study vicinity. More than 130 species of birds are documented with the potential to occur within the sites. These species include representative songbirds, birds of prey, waterfowl, owls, and shorebirds.

Fisheries

The closest surface water that supports fisheries is Prickly Pear Creek, approximately 160 feet east of the northbound site. According to Montana Fish, Wildlife, and Parks (FWP) Montana Fisheries Information System (MTFISH) database, the stretch of the creek near the site

supports multiple fish species including brook trout (*Salvelinus fontinalis*), brown trout (*Salmo trutta*), longnose sucker (*Catostomus catostomus*), mottled sculpin (*Cottus bairdii*), rainbow trout (*Oncorhynchus mykiss*), and white sucker (*Catostomus commersonii*).

Threatened and Endangered Species

USFWS Information for Planning and Consultation (IPaC) lists three threatened species as potentially occurring within the vicinity of the northbound and southbound sites. These species include Canada lynx (*Lynx canadensis*), grizzly bear (*Ursus arctos horribilis*), and North American wolverine (*Gulo gulo luscus*).

MTNHP shows Canada lynx as potentially occurring within the vicinity of the Jefferson City Safety Rest Area. However, suitable habitat for these species is not found within the rest area limits. Additionally, no suitable habitat for grizzly bear and North American wolverine were identified within the rest area limits.

Species of Concern and Special Status Species

Four Montana species of concern/special status species are documented within the vicinity of the northbound and southbound sites. These species include westslope cutthroat trout (*Oncorhynchus clarkia lewisi*), Clark's nutcracker (*Nucifraga columbiana*), hoary bat (*Lasiurus cinereus*), and wolverine (*Gulo gulo*).

MTNHP shows Clark's nutcracker and westslope cutthroat trout have been observed within the study vicinity. Prickly Pear Creek may provide suitable habitat for westslope cutthroat trout. The sites may provide foraging habitat for the hoary bat. No suitable habitat for Clark's nutcracker or wolverine were identified. The MTNHP Environmental Summary Report can be found in Appendix M.

Bald eagles are protected under the Bald and Golden Eagle Protection Act. The Montana FWP Bald Eagle Nest Database recorded no Bald or Golden Eagle nests within the vicinity of either rest area. Additionally, no suitable habitat exists within the vicinity of the sites. The nearest recorded Bald Eagle nest is located approximately 18 miles south of the northbound site.

According to the Montana Sage Grouse Habitat Conservation Map, neither site is located within sage grouse core habitat, connectivity habitat, or general habitat.

Social and Cultural Resources

Demographics

According to U.S. Census Bureau population estimates, Jefferson County has seen a slight population increase in the last seven years from 11,406 in 2010 to 11,625 in 2017. Montana Department of Commerce population projections predict the population in Jefferson County will decrease to 10,192 by 2060.

This analysis does not assess the presence of Environmental Justice populations because any options proposed for the Jefferson City Safety Rest Area would have no new effects on the adjacent surrounding area.

Economic Conditions

The Jefferson County economic base includes educational services, health care and social assistance, retail trade, construction, professional/scientific/management/administrative/waste services, arts/entertainment/recreation/accommodation/food services, and other services except

public administration. According to the U.S. Census Bureau, in 2017 Jefferson County has a slightly higher unemployment rate of 5.7% compared to Montana's unemployment rate of 4.8%.

Land Use

Property maps for Jefferson County show land surrounding both sites as privately owned. No lands under federal or state jurisdiction, other than Prickly Pear Creek, were identified within the direct vicinity. A small plot of Bureau of Land Management (BLM) land is located approximately 0.5-mile northeast of the northbound site. Land use is primarily agriculture, with some commercial and residential uses.

Recreational Resources

There are no state or federal public lands, public parks, or recreational fields, within or immediately surrounding either site. Fishing may occur on Prickly Pear Creek; however, the segment in the direct vicinity of the northbound site does not provide fishing access and is unlikely to be a popular recreational site.

No properties using National Land and Water Conservation Fund Act (LWCF) Section 6(f) grants are located within or adjacent to the northbound and southbound sites.

Cultural Resources

Given that all potential alternatives are expected to remain within the previously-disturbed sites, a cultural resources investigation is not warranted. The structures associated with both sites were built in 1972 and are less than 50 years old. Additionally, no National Register of Historic Places sites are located within the vicinity of the study area.

Noise

The closest noise-sensitive receptor is a residence approximately 300 feet northwest of the southbound site. The sites are located in a rural residential area and multiple residences are located within 0.25 mile of both sites.

Visual Resources

Immediate views at both sites include the paved parking area and building structures surround rural residential land at the southbound site and a small riparian complex on Prickly Pear Creek at the northbound site. Views of Interstate 15 are also directly visible from both sites. Views at both sites include agricultural fields, shrubland, and conifer/grass covered hillslopes. Distant views include the Elkhorn Mountains to the east and the Boulder Hills to the west.

3.0 PUBLIC AND STAKEHOLDER INVOLVEMENT

MDT invited stakeholders and members of the public to participate in the planning process by providing input on stopping opportunities in the study area. Specific outreach methods are described in the following sections. Additional information is provided in Appendix O.

3.1 Study Websites and Study Posters

MDT hosted a website at <https://www.mdt.mt.gov/pubinvolve/jeffersoncity/> to provide information about the safety rest area study. The website provided information about how to submit comments, study contacts, a list of frequently asked questions (FAQs), and the study schedule. Related links provided access to the Montana Rest Area Plan and the online Montana Rest Area Map. The website also provided draft documents for public review and comment.

At the beginning of the study period and during the public review period, MDT placed posters in locations throughout the study area. Posters illustrated the rest area study location, explained the study focus, and provided links to the study website and comment form. Posters locations are listed in Table 5.

Table 5: Public Review Poster Locations

Locations	
<ul style="list-style-type: none"> • Boulder Town Pump • Dearborn Rest Area (NB and SB) • Divide Rest Area (NB and SB) 	<ul style="list-style-type: none"> • Jefferson City Rest Area (NB and SB) • Monroe’s High County Travel Plaza • Rocker Truck Stop/Town Pump

3.2 Team Meetings

MDT subject matter experts met regularly during the study to discuss progress, methods, results, draft documents, public input, and other issues or concerns. The study team served in an advisory capacity and reviewed study documentation before publication. A full list of team members may be found in the acknowledgments section of this report. Meeting minutes are included in Appendix O.

3.3 Survey Summaries

The study team reviewed responses from the Montanan’s Views on Highway Maintenance, and 2017 TranPlanMT surveys to identify information about user perceptions of rest area facilities within the study vicinity and statewide. Key findings relating to the Jefferson City Safety Rest Area study are summarized below. Additional survey information is provided in Appendix N.

Montanans’ Views on Highway Maintenance: Winter 2016-2017

- The majority of respondents rated rest area maintenance as either excellent or good, while roughly two out of ten rated rest area maintenance as either fair or poor. The Butte District ratings were found to be nearly comparable to the total; however, the poor category was slightly higher at 4.7% compared to 3% total. The somewhat higher poor rating for the Butte District suggests the need to address older facilities such as the Jefferson City site.
- The majority of respondents also view rest area maintenance as very important to somewhat important. While roughly one of ten respondents viewed rest area maintenance as somewhat unimportant to very unimportant.
- Collectively, these results suggest public support for maintaining a high level of maintenance activities at the Jefferson City site.

2017 TranPlanMT: Stakeholder and Public Survey

- Improving rest areas received an average priority ranking, which was much lower relative to other improvement options presented in the survey. Rest areas were also ranked fourth out of seven categories for improvement cuts should funding decline.
- Together, these results suggest public support for maintaining some level of service at the Jefferson City site while supporting MDT’s consideration of reduction in service.

3.4 Stakeholder Interviews

Team members contacted 14 stakeholder representatives to request input on the study. Of these, representatives from the Motor Carriers of Montana, Helena Tourism Alliance, Jefferson County Commissioners, Silver Bow County Commissioners, Jefferson County Planning, Lewis and Clark County Planning, Montana Department of Commerce, and the Montana Office of

Tourism and Business Development participated in interviews in May 2019. Members of the study team asked stakeholder representatives to provide input on stopping opportunities in the study area and opinions on the two alternatives considered for this study (reduction in service to a truck parking area or complete site closure).

Collectively, interview participants expressed:

- an awareness of the safety benefits of truck parking areas;
- support for maintaining a truck parking area at the existing Jefferson City northbound and southbound sites to perpetuate safe stopping opportunities; and
- rejection of full closure of the Jefferson City facilities.

Additional interview information is provided in Appendix O.

3.5 Written Comments

The study website and posted flyers encouraged members of the public to submit comments on the study. Examples of these efforts are included in Appendix O.

A total of one written comment was received during the review period for the draft study which extended from December 1 to December 31, 2019. Written comments are contained in Appendix O and are organized by the date received.

In conclusion, public and stakeholder involvement generally support MDT's consideration of a reduction in service at the Jefferson City Safety Rest Area (i.e., conversion from a full-service safety rest area to a truck parking area with a vaulted toilet). Survey results do not support complete closure of the safety rest area.

4.0 NEEDS AND OBJECTIVES

MDT has defined a need to address the existing Jefferson City Safety Rest Area northbound and southbound sites. The current facilities are open seasonally from April 15 through November 15 to the public pending the outcome of this study.

To optimize Safety Rest Area Program investment strategies, MDT sought an alternative that accomplishes the following objectives.

- Minimizes capital and long-term maintenance costs.
- Leverages federal-aid funding and reduces demands for limited state funding.
- Minimizes impacts to physical, biological, and social/cultural resources which could result in costly and time-consuming mitigation and abatement activities.
- Provides safe stopping opportunities spaced by a maximum of approximately one hour of travel time.
- Accommodates public and stakeholder feedback regarding stopping and parking opportunities.
- Aligns with existing MDT plans, policies, and asset management strategies.
- Adheres to FHWA rules, regulations and guidance regarding the operation, maintenance and abandonment of Rest Area facilities.

5.0 ALTERNATIVES

5.1 Alternative Identification

MDT considered two action alternatives to achieve identified objectives for the existing northbound and southbound Jefferson City Safety Rest Area sites.

Alternative 1: Reduction of Service

In accordance with MDT's *Safety Rest Area – Reduction of Service* memorandum, this alternative would lessen the current functionality of the existing northbound and southbound Jefferson City Safety Rest Area sites. The reduced service facilities would provide the function and features of a typical truck parking site.

To reduce capital and long-term maintenance costs, the premise of this alternative is to maintain and/or rehabilitate existing site features only to the degree consistent with similar truck parking facilities across the state and, as required, to meet safety and regulatory requirements. Additional improvements to the northbound and southbound sites could be considered at the time MDT pursues a future project but are not reflected in this study. This alternative includes the following primary elements.

Maintain entrance/exit ramps and parking areas.

Existing pavement would remain in service to provide access to truck and passenger vehicle parking areas. MDT would remove the raised median islands (northbound site only) to facilitate winter maintenance and apply a chip seal treatment to the entire surface to preserve/maintain pavement areas. Truck parking at the southbound site does not function to the current standard found at state-maintained rest and truck parking areas. MDT would reconstruct the southbound parking area to allow for WB-67 turning movements and provide similar truck parking to the northbound site. A typical site layout of the increased truck parking at the southbound site is included in Appendix P.

Remove building facilities and foundations.

MDT would demolish and remove the existing building structures and concrete foundations.

Abandon wastewater tanks.

MDT would remove the lids on the existing underground wastewater tanks and fill the tanks with gravel to eliminate future risk of collapse.

Cap associated wastewater piping and decommission drainfields.

MDT would cap existing wastewater transport piping approximately five to ten feet from building structures and abandon existing drainfields in place.

Maintain wells for irrigation and cleaning use (not as a public water source).

MDT would maintain the existing water wells to serve irrigation and cleaning needs at the sites. MDT would not provide potable water for public use.

Install vaulted toilets.

MDT would install vaulted toilets and new holding tanks, which would require periodic pumping.

Remove picnic areas, pet amenities, and adjacent walkways.

Although the existing picnic shelters are structurally sound, MDT does not typically provide picnic and pet amenities at truck parking areas. For consistency with the level of service

provided at similar sites across the state, MDT may remove these amenities and adjacent walkways.

Upgrade remaining walkways to meet ADA requirements.

To comply with ADA requirements, MDT would remove existing sidewalks and pedestrian access routes. The sidewalks adjacent to parking areas and vaulted toilets would be replaced to meet ADA requirements.

Reseed reclaimed areas.

MDT would reclaim and reseed all locations no longer in service (e.g., areas formerly occupied by building structures, picnic shelters, and walkways). Revised record drawings would show all abandoned site features, including piping and drainfield locations.

Alternative 2: Closure

The second alternative would involve complete demolition of the northbound and southbound building facilities, parking areas, ramps, water/wastewater systems, and site amenities. Under this scenario, the entire site would be reclaimed and reseeded. It is anticipated that some paving work and shoulder shaping would be required to reconstruct asphalt wedges along the outside shoulder of the I-15 mainline where ramp pavement would be removed by saw cutting during the demolition process. Revised record drawings would show all abandoned site features, including piping and drainfield locations.

Alternatives Eliminated from Consideration

MDT determined that the no-action alternative is not viable. Water and wastewater systems have exceeded their design service life. Needed improvements to wastewater systems would be difficult for the reasons outlined in Section 2.3 and improvements to the water system would be necessary to bring the system into compliance with current regulations and requirements for public water supply systems. Additionally, the facilities are not compliant with ADA accessibility requirements and have continued to deteriorate in recent years. A substantial capital investment would be required to address the identified deficiencies. Of the rest areas in Montana, the Jefferson City southbound and northbound sites have the 5th and 7th lowest health index scores as of 2019, respectively, due to these factors.

MDT also determined that rehabilitation of the existing safety rest area is not a viable alternative due to spacing redundancy in the corridor, risks and costs associated with upgrading the water and wastewater systems, restrictive site constraints, and safety rest area program funding constraints.

5.2 Screening

In consideration of MDT's *Safety Rest Area – Reduction of Service* memorandum, the study team identified the following seven screening criteria to evaluate the action alternatives.

Capital and Maintenance Costs

MDT must weigh initial capital costs associated with demolition and site improvements with long-term maintenance costs associated with perpetuating service at the Jefferson City sites. The analysis in Appendix P details the estimated capital cost for each alternative and the anticipated long-term maintenance costs inflated over the 2039 planning horizon. Costs are presented in 2019 dollars and represent individual totals for the northbound and southbound sites.

Alternative 1 (Reduction in Service):

Initial capital costs would be higher compared to Alternative 2

Site	Alternative 1 Estimated Capital Cost	Estimated Long-term Maintenance
✓ Jefferson City NB	\$357,000	\$248,000
✓ Jefferson City SB	\$717,000	\$248,000

Long-term maintenance costs were estimated from the Interstate truck parking areas presented in Table 4. A 25% contingency for MDT Maintenance effort was incorporated in the average. (approximately \$10,000 annually at each site or \$248,000 totaled over 20 years, assuming 2% inflation).

Alternative 2 (Closure):

Initial capital costs would be lower compared to Alternative 1.

Site	Alternative 2 Estimated Capital Cost	Estimated Long-term Maintenance
✓ Jefferson City NB	\$292,000	\$0
✓ Jefferson City SB	\$222,000	\$0

Long-term maintenance costs would be eliminated under this alternative.

Funding Eligibility

Certain MDT activities are typically eligible for federal funding (such as capital improvements to highway infrastructure), whereas others must be funded from state sources (such as maintenance costs). As outlined in the FHWA non-regulatory supplement (NS 23 CFR 752), the cost of interstate safety rest area abandonment is not eligible for federal-aid funding. Accordingly, the closure alternative would be ineligible for federal funding and would need to be entirely supported by state funds. The reduction in service alternative would be eligible for federal funding because it would continue to provide a safe stopping opportunity with parking and vaulted toilet services.

Environmental Risk

MDT desires to avoid or minimize environmental resource impacts resulting from a future project at the Jefferson City sites. Associated mitigation and abatement activities can result in increased costs, schedule delays, and elevated project risk for MDT. Potential risks and associated screening outcomes are discussed below.

Physical Resources

Alternative 1 (Reduction in Service):

- No adverse permanent impacts to prime farmland, geologic resources, surface water, TMDLs, wild and scenic rivers, wetlands, irrigation, floodplains and floodways, and air quality are anticipated.
- Contaminated soils may exist within the MDT right-of-way at each site. Ground-disturbing activities are necessary at this location and include removal of the building facilities and wastewater infrastructure. Encounters with contaminated soils would likely be minimal. However, contractors will need to follow safe handling procedures and

identify appropriate disposal methods if contaminated soil (or soil residue) is encountered.

- The presence of lead-based paint on blue parking curbs would require proper handling and disposal during building demolition.
- The screening outcome is **neutral** (○) due to the limited risk potential of encountering contaminated soils (with all other potential risks equal to Alternative 2).

Alternative 2 (Closure):

- No adverse permanent impacts to prime farmland, geologic resources, surface water, TMDLs, wild and scenic rivers, wetlands, irrigation, floodplains and floodways, and air quality are anticipated.
- Contaminated soils may occur within MDT right-of-way at each site. Ground-disturbing activities are necessary at this site and include complete demolition of the rest area site, thus resulting in a greater risk of encountering contaminated soils. Contractors will need to follow safe handling procedures and identify appropriate disposal methods if contaminated soil (or soil residue) is encountered.
- The presence of lead-based paint on blue parking curbs would require proper handling and disposal during building demolition.
- The screening outcome is **negative** (-) due to the greater potential for encountering contaminated soils (with all other potential risks equal to Alternative 1).

Biological Resources

Alternative 1 (Reduction in Service):

- No adverse permanent impacts to vegetation, noxious weeds, general wildlife species, threatened and endangered species, species of concern, and special status species are anticipated.
- The screening outcome is **neutral** (○) due to the limited likelihood of noxious weed establishment (with all other potential risks equal to Alternative 2).

Alternative 2 (Closure):

- No adverse permanent impacts to general wildlife species, threatened and endangered species, species of concern, and special status species are anticipated.
- Ground-disturbing activities to the entire site may increase the spread of noxious invasive weeds if native seeding does not establish.
- The screening outcome is **negative** (-) due to the greater likelihood of noxious weed establishment (with all other potential risks equal to Alternative 1).

Social and Cultural Resources

Alternative 1 (Reduction in Service):

- No adverse permanent impacts to demographics, economic conditions, land use, recreational resources, cultural resources, noise, or visual resources are anticipated.
- The screening outcome is **neutral** (○) due to limited risks associated with social and cultural resources (equal to Alternative 2).

Alternative 2 (Closure):

- No adverse permanent impacts to demographics, economic conditions, land use, recreational resources, cultural resources, noise, or visual resources are anticipated.
- The screening outcome is **neutral** (○) due to equal risks associated with social and cultural resources (equal to Alternative 1).

Spacing and Corridor Needs

The Jefferson City Safety Rest Area is redundant along I-15 due to its proximity to the Helena, Boulder, and Butte sites.

Alternative 1 (Reduction in Service):

- A truck parking area at Jefferson City would provide additional safe stopping opportunities and positively impact existing facilities in the study area. Accordingly, the screening outcome is **positive** (+).

Alternative 2 (Closure):

- Complete closure would reduce parking and safe stopping opportunities in the study area. During peak usage periods, some parking needs along this portion of the I-15 corridor (Helena to Butte) would be unmet. Accordingly, the screening outcome is **negative** (-).

Public/Stakeholder Feedback

This screening criterion considers feedback provided through the MDT 2017 TranPlanMT Survey, stakeholder interviews conducted for the Jefferson City Safety Rest Area study, and public comments provided by mail, email, and telephone.

Alternative 1 (Reduction in Service):

- Public and stakeholder sentiment generally supports maintaining the existing Jefferson City northbound and southbound sites as truck parking areas to perpetuate MDT's investment and provide safe stopping/parking opportunities in the study area. Accordingly, the screening outcome is **positive** (+).

Alternative 2 (Closure):

- Public and stakeholder sentiment generally opposes complete closure of the sites. Accordingly, the screening outcome is **negative** (-).

Alignment with MDT Plans

A number of MDT plans provide guidance and outline goals, strategies, and best practices for MDT's safety rest areas.

The *Montana Rest Area Plan* outlines a series of guidelines to aid the Statewide Rest Area Prioritization Plan Committee and MDT Districts in managing rest area infrastructure and making investment decisions. The process for considering reduction of service decisions is further defined in the MDT *Safety Rest Area – Reduction of Service* memorandum.

TranPlanMT, the statewide long-range transportation, recognizes the value that safety rest areas offer in providing safe stopping opportunities for motorists along Montana's highways. *TranPlanMT* defines a safety strategy to: "**Continue improvements to the safety rest area program to provide safe stopping locations for the traveling public.**"

The *Montana Freight Plan* discusses rest area conditions, trends, performance, and forecasts. Given continued public and freight movement demand for safe, clean, and functional rest and parking areas, the plan outlines MDT's intention to evaluate current and future availability of services to provide safe stopping opportunities where needed.

Alternative 1 (Reduction in Service):

- Alternative 1 would reduce service in accordance with network evaluation guidelines outlined in the *Montana Rest Area Plan* and provide continued investment in safe stopping opportunities as stated in *TranPlanMT* and the *Montana Freight Plan*. Accordingly, the screening outcome is **positive (+)**.

Alternative 2 (Closure):

- Although closure of the Jefferson City Safety Rest Area would follow guidelines outlined in the *Montana Rest Area Plan*, it would not provide continued investment in safe stopping opportunities as stated in *TranPlanMT* and the *Montana Freight Plan*. Accordingly, the screening outcome is **negative (-)**.

Additional Requirements

In 1992, FHWA issued a non-regulatory supplement (NS 23 CFR 752) addressing abandonment of Interstate rest areas. It noted the following pertinent points. The full text of the supplement is provided in Appendix Q.

- A state may abandon an Interstate rest area provided there is a well-documented evaluation demonstrating that the rest areas to remain are adequate in both number and size to satisfy the needs of the traveling public.
- Recognizing the possibility that, in some instances, the driver or rider in a truck may have need for these facilities, exceptions which would permit rest areas for trucks without handicapped provisions should not be granted.
- The question of whether or not parking areas in rest areas, which lack other facilities, should continue to be available for use is an operational consideration and thus a state decision. The decision should be made on an individual basis depending on the circumstances. Retention could be a safety benefit. On the other hand, if activities in these sites are or become nuisances, closure may be the only acceptable solution.
- If it is agreed there is a reasonable expectation that the site will be used for highway purposes at some time in the future, no further action is required. If, however, it is determined the site will never be used for such purposes disposal of the excess property to comply with OMB Circular A-102, Attachment N, Section 3, Real Property, will be necessary.
- A state may be permitted to retain the land on which an abandoned rest area is situated. Any use of an abandoned rest area should not be of a permanent nature so that it could revert to rest area usage if a future need should develop.
- The abandoned, but not disposed of, rest areas should be properly maintained and any activities occurring at the closed rest area, whether lawfully or by trespassers, should not be detrimental to the operation of the Interstate system.

Alternative 1 (Reduction in Service):

- This alternative would not be considered a form of abandonment as it would continue to provide a safe stopping opportunity with parking and vaulted toilet services. The screening outcome is **positive (+)** because supplemental evaluation would not be required.

Alternative 2 (Closure):

- This alternative would be considered a form of abandonment as it would eliminate all services. An evaluation would need to be submitted demonstrating adequate remaining safety rest areas within the study area. MDT would need to maintain or dispose of the property, as appropriate. The screening outcome is **negative (-)** because supplemental evaluation would be required.

Summary of Screening Results

Table 6 on the following page summarizes costs, funding eligibility, and other screening outcomes for the evaluated action alternatives.

Table 6 Notes:

- All costs represent individual totals for the northbound and southbound sites.
- A **+** symbol indicates a **positive screening outcome**. The alternative is considered desirable due to:
 - anticipated lack of adverse environmental impacts and lower risk of environmental mitigation/abatement;
 - ability to meet corridor needs;
 - positive public/stakeholder feedback;
 - alignment with MDT plans; and
 - no additional FHWA requirements.
- A **○** symbol indicates a **neutral screening outcome**. The screening criterion does not assist MDT in selecting between the two action alternatives, resulting in no effect on the screening result.
- A **-** symbol indicates a **negative screening outcome**. The alternative is considered less desirable due to:
 - anticipated adverse environmental impacts and/or higher risk of environmental mitigation/abatement;
 - inability to meet corridor needs;
 - negative public/stakeholder feedback;
 - conflict with MDT plans; and
 - additional FHWA requirements.

Table 6: Screening Summary

Screening Criteria			Action Alternative 1 Reduction in Service	Action Alternative 2 Closure
A	Costs	Capital	\$357,000 (NB) \$717,000 (SB)	\$292,000 (NB) \$222,000 (SB)
		Maintenance	Annual cost of \$10,000 and cumulative cost of \$248,000 through 2039 per site.	\$0
B	Funding Eligibility	Federal	\$357,000 (NB), \$717,000 (SB) – eligible for federal funding per NS 23 CFR 752	\$0 – not eligible for federal funding per NS 23 CFR 752
		State	Long-term maintenance (annual cost of \$10,000 and cumulative cost of \$248,000 through 2039 per site, assuming 2% inflation)	Demolition/reclamation costs \$292,000 (NB) \$222,000 (SB)
C	Environmental Risk	Physical Resources	○ Limited risk potential to encounter contaminated soils (with all other potential risks equal to Alternative 2).	- Greater potential to encounter contaminated soils (with all other potential risks equal to Alternative 1).
		Biological Resources	○ Limited likelihood of noxious weed establishment (with all other potential risks equal to Alternative 2).	- Greater likelihood of noxious weed establishment (with all other potential risks equal to Alternative 1).
		Social/Cultural Resources	○ Limited risks associated with social and cultural resources	○ Limited risks associated with social and cultural resources
D	Spacing and Corridor Needs	+ Would provide safe stopping opportunities and augment parking facilities in the study area.	- Would reduce parking and stopping opportunities in the study area.	
E	Public/Stakeholder Feedback	+ Public/stakeholder support for maintaining the existing Jefferson City sites as truck parking areas.	- Public/stakeholder opposition to complete closure of the sites.	
F	Alignment with MDT Plans	+ Would provide continued investment in safe stopping opportunities.	- Would not provide continued investment in safe stopping opportunities.	
G	Additional Requirements	+ Supplemental evaluation would not be required.	- Supplemental evaluation would be required.	

6.0 CONCLUSIONS AND NEXT STEPS

Based on the analysis conducted for this study, Alternative 1 (reduction in service) is the preferred alternative for the following reasons:

- Existing facilities are not sufficient to address truck parking needs during peak usage periods (summer months) along this portion of the I-15 corridor.
- Alternative 1 would provide additional stopping opportunities along this portion of the I-15 corridor.
- Stakeholder groups expressed support for safe stopping/truck parking opportunities at the Jefferson City Rest Area site.
- Stakeholder groups rejected Alternative 2 (closure option) for the Jefferson City Rest Area site.
- Stakeholder and public comments supported the reduction of service option (vs. the closure option).
- Alternative 1 (reduction in services) is eligible for federal-aid funding and requires no state matching funds.
- Alternative 2 (closure option) must be funded entirely with state funds (not federal-aid eligible).
- While maintenance costs are higher for Alternative 1 (reduction of service), the total amount of state funds required to implement Alternative 1 are comparable to Alternative 2 (closure option).
- Alternative 2 (closure option) triggers an FHWA requirement that MDT perform a supplemental evaluation to demonstrate adequate safety rest area services will remain after the abandonment of the Jefferson City Area site.
- It is unlikely that MDT could provide adequate justification for Alternative 2 (closure option) based on truck parking and facility demands along the I-15 corridor between the Helena and Butte Urban Areas.

Consequently, this study recommends implementation of Action Alternative 1 (reduction in service) at the Jefferson City Safety Rest Area sites



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OF TRANSPORTATION**

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