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From: Riley, Jean [mailto:jriley@mt.gov]

Sent: Tuesday, October 18, 2011 8:06 AM

To: FS-comments-northern-helena

Subject: Mike Horse Mine Repository Siting Study MDT Comment Letter

Please find the attached comment letter from the Montana Department of Transportation. A hard copy will follow.

Jean A. Riley, P.E. - Transportation Planning Engineer Planning & Policy Analysis Bureau Montana  
Department of Transportation  
(406) 444-9456



October 18, 2011

Kathy Bushnell  
Helena National Forest  
2880 Skyway Dr.  
Helena MT 59602

Subject: Mike Horse Mine Repository Siting Study Comments

Dear Ms. Bushnell,

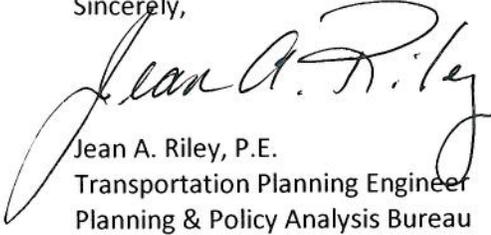
The Montana Department of Transportation (MDT) would like to thank you for the opportunity to comment on the *Repository Siting Study for the Upper Blackfoot Mining Complex*. The siting study indicates a possible 1,000,000 cubic yards of contaminated soils being transported from the site to various repositories. The study includes proposals that use of MT 200 for transport routes of the contaminated materials. MT 200 is under MDT jurisdiction.

MDT would like to submit the following comments on the study:

- The truck traffic using MT 200 or other state highways must comply with Montana Motor Carrier Services (MCS) requirements. If there are any questions concerns these requirements, please contact Dan Kiely at MCS.
- If there are new approaches being proposed to access MT 200 or other routes maintained by MDT, the access design and location must be reviewed and approved by MDT prior to construction.
- If the routes are using existing approaches to MT 200 or other routes maintained by MDT, these approaches should be evaluated to determine if the design vehicle (haul truck) can safely maneuver without encroachment into other lanes, especially oncoming traffic.
- The study does not indicate if the truck loads will be covered during transport. MDT will not take responsibility for contaminated soils blowing from uncovered loads and impacting MDT right-of-way.
- If the haul trucks anticipate using MT 200 or other MDT routes, MDT must be notified of the dates and hours of the hauling.
- All haul trucks using MDT routes must be free and clean of any debris prior to entering the routes.
- The haul routes must be assessed for operational safety when used for the waste haul. The safety of the traveling public was not taken into account in this document.
- The analysis did not look at the impacts to the haul routes as a result of the additional truck traffic. The roadway damage from the haul trucks must be assessed and should be used to in the evaluation of the alternatives.

If you have questions concerning these comments, please contact me at (406)444-9456 or [jriley@mt.gov](mailto:jriley@mt.gov).

Sincerely,



Jean A. Riley, P.E.  
Transportation Planning Engineer  
Planning & Policy Analysis Bureau

Copies: Mick Johnson – Great Falls District Administrator  
Tony Strainer – Great Falls Maintenance Chief  
Dan Kiely – MCS License & Permit Bureau Chief  
Jim Skinner – Planning & Policy Analysis Bureau Chief  
Tom Martin – Environmental Services Bureau Chief  
Mike Tierney – Planning & Policy Analysis Bureau  
File