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Sent: Friday, October 21, 2011 5:34 PM
To: FS-comments-northern-helena
Subject: Upper Blackfoot Mining Complex Respository Siting

Comments on Repository Siting by Paul Roos

I am a member of Trout Unlimited and specifically the Big Blackfoot Chapter of Trout Unlimited and concur completely with formal comments submitted on October 20, 2011 and signed by Bruce Farling, Executive Director. I would like to add the following:

1. Assuming that whatever repository site chosen and used is the most protective over time for the waters of the Blackfoot watershed, then it seems the largest concern is the likelihood of impacts associated with hauling on at least Highway 200 and possibly Highway 279. Much more ought to be known regarding periods of the year, days of the week, and hours of the day when hauling occurs, frequency of trucks coming and going, projections of existing and future traffic during proposed haul times, modeling of the potential for accidents, and open consideration of "what's the worst that could happen?"
2. If S. 35 ultimately flushes out as the repository site, then comparative cost/benefit analysis ought to be done of highway hauls vs. an alternative route. The "what ifs" are really important here. Traffic counts, wait times, costs of flagging crews are quantifiable, but interaction with the public on a daily basis over time is not. On the highways there will be drunks, human mistakes, equipment failures, and just plain bad, illegal, or dangerous behavior. Counting return trips some projections have truck highway entries at just a little under 2 trucks per minute. Every one of those trucks will have to take time to get up-to-speed and time to slow down for exit. There is mathematical modeling for this kind of thing. The potential for impacts to the flow of traffic is scary to me. An obvious and important benefit to a non-highway haul route would be significantly fewer impacts to neighbors.
3. If a haul road is constructed to S. 35, then a circular route with one-way traffic ought to be explored. Roads can be narrower, safety might be better, trucks might be able to be bigger, the time needed for the project might shorten or at least be more predictable, and narrower roads would be easier to reclaim.
4. Even if a two way haul road is used for part or all of the route, the types of trucks could be significantly different from highway trucks which could skew any cost/benefit analysis unless that information is explored and considered.
5. And finally, prior to 1975 I enjoyed fishing on the Blackfoot above Lincoln. From 1975 until sometime in the mid-1990s the quality of the fishing could not justify fishing up there. The river above Lincoln is fishing pretty well again now. However, with the poison where it is, it's only a matter of time until disaster strikes again. Let's get it done!

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