

**SUPPLEMENTAL EIS  
RESPONSES TO COMMENTS**

**TRANSPORTATION**

Roads .....	ROAD-900
Railroads and Rail Loadout Facility ( <i>No comments submitted</i> ) .	ROAD-901

**ROAD-900 Roads**

1. *Please adequately address transportation to mine site and increased use of area roads by the influx of population to the Noxon area. Consider paving major area roads; dust, sediment, spring-break-up. (S3432)*

Response: The “use of area roads other than Forest Service roads by the influx of population to the Noxon area” is most properly addressed by Sanders County possibly through the mitigation plans developed under the Hard Rock Impact Act. The use of area roads by the public, other than those within the project area is outside the scope of this project. Spring-break-up conditions normally effect all roads, whether forest, county, state or private. The main access road to the mill site would be designed to accommodate legal highway loads, imposed by the State Department of Highways, during normal and spring break-up conditions. FDR No. 150 and a portion of FDR No. 150B would be paved. Any high traffic volume gravel surfaced roads will be dust abated. Sediment would be minimized during construction by incorporation of best management practices (BMP) during and immediately after work is completed on the roads.

Road maintenance and reclamation is discussed in Chapter 2, Transportation sections of the alternatives descriptions. Any reclamation of the roads required by the Kootenai National Forest (KNF) at closure would be paid by Sterling. A reclamation bond would be held by DEQ to reclaim roads identified in the preferred alternative. The bond would be reviewed every 5 years. If the KNF decides that a road reclamation plan needs to be changed during mine life the agencies can require Sterling to modify the reclamation plan and bond accordingly.

2. *Also the culvert under Government Mtn Rd at Miller Gulch is not large enough to handle a 100-yr 24-hr precipitation event. We have had water running over the road several times through the years. (S4892)*

Response: This road is a Sanders County road. Increasing the size of the culvert to handle higher flows is the responsibility of Sanders County. However, as this road would be used for traffic generated by this project, the drainage has been analyzed and a culvert would be designed by Sterling to accommodate a 100-yr event, with concurrence of the County.

3. *They intend to eliminate public access to a huge amount of public land. The mine will monopolize all access to the Rock Creek drainage. (S5122)(S6572)*

Response: As described in the Transportation and Recreation sections in Chapter 4, public access would only be limited in specific areas such as the paste facility, mill site and along a section of FDR No. 150 in the vicinity of Government Mountain. See the above sections for more descriptions.

4. *Long term maintenance of the roads, during and after the project, needs to be addressed. Who will pay and do it, and how often? If a road is to be obliterated after the project has run its course, to what degree will it be obliterated, when, and who will pay? This should be addressed in the document. (S5484)*

Response: This is found in two places: Chapter 2, Alternatives II and V, and Chapter 4, Alternative II. Road maintenance during the project life would be a joint responsibility. The Kootenai National Forest will dictate when and what needs to be done. The cost would be shared commensurate with each parties’ traffic volumes. Road obliteration, after closure of the mine, would be addressed at mine closure since future road needs are very difficult to predict at this time. Roads that were constructed by Sterling, and not needed for forest management, would be reclaimed by Sterling. The Forest Service would be responsible for operations and maintenance of any roads it chooses to retain for Forest Service uses after mine closure.

5. *Please address the enormous traffic increase on scenic Highway 200. (S6745)*

Response: See section Chapter 4, Transportation, Alternatives II, III, IV, and V which address the increased traffic load on Highway 200.

6. *Busing to reduce official work traffic is acceptable, but we must remind you that there was a game preserve that attracted many sightseers on evenings and weekends to observe wildlife at the Troy Project travel corridor. What is wrong with this? Many people want to see animals, can't get out and hike, but enjoy a pleasure drive. Your mitigation package would deprive them of this golden opportunity. This is the highest recreational use currently on our national forests! (S25)*

Response: Busing of mine workers is proposed under Alternative V to minimize mine impacts to wildlife and provide for greater safety on FDR No. 150 by reducing the amount of mine generated traffic. The public would still be able to drive on the road; there is no intent to bus the public.

7. *Page 2-98. Figure 2-35 shows the Noranda rail siding and access roads but not the corresponding facility and roads for the proposed Rock Creek project, leaving the "picture" lop-sided and the comparison incomplete. (S6759)*

Response: Thank you for your comment. The figure shown is to relate the relative placement of mining operations for both projects to one another. For a more detailed layout of the Rock Creek Mine Proposal there are several figures throughout the document which provide considerable detail.

8. *Pages 4-143 and 4-146. Traffic Volume. The substantial increase in traffic volume is likely to increase the need for regular highway maintenance, particularly during winter months, and to increase the need for all types of accident-related emergency services. Potentially tragic mine and school traffic conflicts might be avoided by scheduling shift changes so that they do not correspond with normal school traffic.*

*The potential 71 percent increase in traffic volume on Highway 200 might also have the effect of decreasing area tourism, unless the high volume traffic hours are well publicized to allow tourists to plan their travel schedules accordingly. (S6759)*

Response: Increased state highway traffic and subsequent maintenance is the responsibility of the Montana Department of Transportation. Emergency services are county-related activities. Both of these agencies services are beyond the scope of this document. The scheduling of shift changes to miss school bus route times can be addressed by Sterling. The Troy Mine had two twelve hour shifts, starting at 6:00 am and 6:00 pm. With a schedule such as this, the mine worker related traffic would happen before and after normal school bus operating times. The increase in traffic due to mine operations is not expected to have any real impact on tourist use of Highway 200. The traffic on the highway would increase substantially at shift changes, but such daily increases would be short in duration and not overlap the hours utilized by most tourists.

9. *Page S-15 Issue 7: Public Access is not included. What happened to it? It is an important issue to those of us that use the Rock Creek drainage. (S471)*

Response: Thank you for noting the omission. The discussion on access has been updated in the final EIS to indicate there were no significant or potentially significant impacts relative to Issue 7.

10. *Page 3-85 Tables 3-28 and 29. Again the Daily Traffic Counts are four seasons out of date and cannot reflect current use adequately. Not upgrading these tables is criminally lazy. (S471)*

Response: Professional judgment, based on past experience, is that daily traffic counts do not increase significantly over time, on the same road unless there is a new major attraction, i.e., trailhead, dam, ski area, or a resource activity such as a timber sale. Most of the traffic count data, years 1985 to 1989, was collected during the mining exploration phase of this project. The 1993

count data was conducted to see if there was any significant increase over the 1984 count data. An increase of two ADT (average daily traffic), although an 8% increase, is not a significant increase to warrant changes in road standards. ADT is used to help indicate the need for increase in road standards, such as surface type, road width, horizontal and vertical alignment, sight distance and turnout spacing. Having a more current ADT count on the Forest Development Roads would not change the requirements for this project proposal.

*11. Traffic of all kinds is increasing on MT 200 and 56 as well as on US 2. However, Table 3-28 does not show the proportion of traffic in heavy trucking. And there is no discussion of accident rates or how they have changed over time. (S4592)*

Response: The table, which is now Table 3-41, in the Transportation section, has been revised with current Montana Department of Transportation data. The table now shows the amount of traffic attributed to heavy trucks and the number of accidents as well as how these accident rates compare to average Montana highway accident rates.

**ROAD-901 Railroads and Rail Loadout Facility**

There were no comments submitted for this category