Russell Street/South 3rd Street - Missoula
Record of Decision

October 2011
Russell Street/South 3rd Street - Missoula

FHWA-MT-011-01-F
Record of Decision
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Decision

The Federal Highway Administration (FHWA) approves the decision to construct and operate the preferred alternatives as identified in the Final EIS for the Russell Street and S. 3rd Street Projects. FHWA selects the preferred alternatives in this Record of Decision for the reasons described herein. This decision was made after careful consideration of all identified social, economic and environmental impacts and input received from agencies, organizations, and the public.

10/31/11
Date of Approval

Kevin L. McLaury, P.E.
Division Administrator
Federal Highway Administration, Montana Division
Russell Street/South 3rd Street - Missoula

FHWA-MT-011-01-F
STPU-M 8105(8)
UPN 4128

Record of Decision
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Decision

In accordance with Title 18, Chapter 2, Section 252, Administrative Rules of Montana (ARM 18.2.252), I hereby accept and concur with the findings and decision as documented in the U.S. Department of Transportation, Federal Highway Administration’s Record of Decision for this project as approved on 10/31/2011.

Date of Approval

Montana Department of Transportation
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The Montana Department of Transportation attempts to provide accommodations for any known disability that may interfere with a person participating in any service, program or activity of the Department. Alternative accessible formats of this information will be provided upon request. For further information call (406) 444-7228 or TTY (800) 335-7592.

This document may be obtained electronically from the Montana Department of Transportation website at: www.mdt.mt.gov/pubinvolve/eis_ea.shtml
1.0 INTRODUCTION

The City of Missoula, in cooperation with the Montana Department of Transportation (MDT) and the U.S. Department of Transportation, Federal Highway Administration (FHWA) propose to reconstruct and widen portions of Russell Street and South 3rd Street to address the current and projected safety and mobility concerns. The proposed project includes the reconstruction of approximately 1.5 miles of Russell Street from the intersection at West Broadway Street south to Mount Avenue/South 14th Street, and reconstruction of approximately one mile of South 3rd Street from Reserve Street east to Russell Street. The proposed project includes vehicular capacity improvements, signalized intersections, accommodation of alternative transportation modes, transit pullouts, sidewalks, grade-separated trail crossings, curb & gutter, boulevards, bicycle lanes, and stormwater drainage.

Based on the information provided in the Russell Street / South 3rd Street Final Environmental Impact Statement and Section 4(f) Evaluation (FEIS) approved on August 4, 2011 and released for public review on August 19, 2011, the City of Missoula, MDT and FHWA have selected Russell Street Alternative 4 and South 3rd Street Alternative E for implementation (Selected Alternatives).

The Selected Alternatives would provide the following specific design features: removal and replacement of the Russell Street Bridge over the Clark Fork River, bicycle lanes, sidewalks, grade separated pedestrian/bicycle crossings, curb and gutter as well as drywells/sumps to improve stormwater management, street lighting, landscaped boulevards, and bus pullouts.
Russell Street – Selected Alternative

The Selected Alternative on Russell Street (Alternative 4) consists of two southbound and two northbound travel lanes, with raised medians and center turn lanes, and the use of signal control at key intersections.

South 3rd Street – Selected Alternative

The Selected Alternative on South 3rd Street (Alternative E) includes two travel lanes (one in each direction), two way left turn lanes, signal control at select intersections, and the use of raised landscaped medians as appropriate.

Trail Connections

The Selected Alternative also includes trail connections on Russell Street at approximately the same location as the existing Bitterroot Branch Trail crossing, where the existing Milwaukee Corridor Trail connects to the east side of Russell Street, and with an extension of the Shady Grove Trail on the River Trail System. Grade-separated crossings would be provided at these locations.

The FEIS provides a complete description of the alternatives considered, and identifies Alternative 4 on Russell Street and Alternative E on South 3rd Street as the Preferred Alternatives. Copies of the FEIS are available by request of the Montana Department of Transportation and on the MDT website at: www.mdt.mt.gov/pubinvolve/eis_ea.shtml

Specific objectives MDT and FHWA would strive to achieve with the project would include:

- Improve safety and mobility
- Improve multi-modal access and mobility
- Minimize impacts
- Maintain community character
Russell Street – Selected Alternative

Key:
- Four lanes with median/turn lane
- Raised median
- Turn lane
- Traffic signal
- Grade-separated crossing

This graphic is conceptual and not intended to reflect final design details.

The locations of raised medians and center turn lanes are conceptual and subject to change during final design.
South 3rd Street – Selected Alternative

Key:
- Yellow: Two lanes with median/turn lane
- Gray: Raised median
- Green: Turn lane
- Red: Traffic signal

This graphic is conceptual and not intended to reflect final design details.

The locations of raised medians and center turn lanes are conceptual and subject to change during final design.
2.0 PURPOSE AND NEED

Given the physical location and functional designations of the Russell Street and South 3rd Street routes, the high traffic volumes, crash history, and multi-modal use of the corridors, the purpose of this proposed project is to provide substantive safety and mobility improvements for all modes of travel in the Russell Street and South 3rd Street corridors.

In these two corridors, a lack of future system capacity and lack of sidewalk continuity are two substantive deficiencies affecting mobility for both motorized and non-motorized users and that point to a need for improvements. By addressing these two issues, additional benefits can also be gained in the following areas: vehicular, pedestrian, and bicycle safety; trail connectivity; improved transit service; and upgrades to an aging bridge structure.

3.0 ALTERNATIVES CONSIDERED

This Record of Decision is based upon the evaluation of a No Build Alternative on both Russell Street and South 3rd Street, as well as five Build Alternatives on Russell Street (Alternatives 2, 3, 4, 5, and 5-Refined) and four Build Alternatives on South 3rd Street (Alternatives B, C, D and E). Those alternatives are described in the FEIS Chapter 2, Alternatives Analysis, and evaluated in the FEIS Chapter 4, Environmental Consequences and Mitigation.

The five Build Alternatives on Russell Street vary in the number of travel lanes and intersection control (signals or roundabouts), but all include replacement of the bridge over the Clark Fork, grade-separated crossings, sidewalks, bike lanes, boulevards, curb/gutter, lighting and bus pullouts.

The four Build Alternatives on South 3rd Street vary in the number of travel lanes and intersection control (signals or roundabouts), but all include sidewalks, bike lanes, boulevards, curb/gutter, lighting and bus pullouts.

Each of the Build Alternatives is anticipated to be an improvement over the No Build Alternative. Generally, the alternatives with roundabouts did not rate as well as those alternatives proposing the use of traffic signals for automobiles, bicycles, and pedestrians at the major intersections. In general, this is because roundabouts lack protected crossings for pedestrians. Furthermore, bicycle lanes cannot extend through the roundabout and, thus, bicyclists must join automobile traffic in navigating through the roundabout. From an automobile perspective, signalized intersections provide more capacity at an intersection; exclusive bicycle and pedestrian facilities can be provided at signalized intersection and a protected phase can assist with their travel. In addition, the use of signalized intersections allows for the development of a traffic signal system where signals can be coordinated to manage traffic flow, vehicle queues, and vehicle emissions. (For more information on the traffic analysis and summary of the findings, see Appendix G of the FEIS.)
However, the alternatives with roundabouts were found to operate better in regards to vehicle safety. Roundabouts generally have a lower number of collisions and result in less severe collisions than traffic signals and stop-controlled intersections. However, roundabouts do not have protected crossings for pedestrians; bicyclists cannot travel through a roundabout in an exclusive right of way (defined bicycle lane); and roundabouts typically require a greater amount of right of way. While alternatives with roundabouts were considered for this project, traffic modeling indicated that the roundabout configurations fell well short of an ability to meet capacity needs to accommodate the year 2035 traffic volumes and resulted in greater impacts to adjacent historic properties.

In addition, the Russell St. alternatives with three lanes do not rate as well as those with five lanes along the corridor segments. This is primarily due to the fact that the three lane facility was found to result in a more congested environment during the year 2035 peak hour traffic conditions, in comparison to the five lane facility. The additional travel lanes associated with the five lane facility provide necessary additional capacity for projected congestion on other parallel roadway facilities in Missoula that cross the Clark Fork River. In addition, a roadway with only one through travel lane in each direction is generally limited to having one exclusive right turn and/or left turn lane; whereas a roadway with multiple through travel lanes can accommodate multiple travel lanes to enhance intersection capacity. (For more information on the traffic analysis and summary of the findings, see Appendix G of the FEIS.)

In addition to the build and no build alternatives described in the following section, several additional alternatives were considered in the EIS document that were not carried forward into the detailed analysis. Some of these alternatives include:

- **Transportation System Management** – which involves the use of Intelligent Transportation System (ITS) technologies to improve roadway efficiencies by considering the addition of auxiliary lanes; adding turn lanes at congested intersections; and optimizing signal timing. Due to the relatively limited population size of Missoula, the short length of the roadway improvement, and the diversity of commuting trips in this corridor, it was determined that a TSM strategy would not provide the necessary improvements in capacity to eliminate the need for other investments in the corridor.

- **Transportation Demand Management** – this alternative typically involves implementing strategies aimed at congestion reduction through the reduction of single-occupancy vehicle use. These strategies will be an important component of the city’s future transportation plans, but this approach would not address the purpose and need of the project on its own.

- **Four lane Russell Street** – this option proposed a four lane road with no median on Russell St. This option was eventually discarded as delays would occur from vehicles attempting to make a left turns. In addition, without a median for refuge, it becomes more difficult for pedestrians to cross the roadway.
Continuous two-way left turn lanes – this option promoted the use of a continuous two-way left turn center lane. This option was eventually discarded due to the fact that raised medians provide a greater margin of safety by separating the opposing directions of traffic. The use of raised medians also allow for access management throughout a corridor and can provide nearly the same opportunities for motorists to turn left as two-way left turn lanes if the raised medians are constructed in conjunction with shorter segments of TWLTL and left turn pockets at key locations. Finally, the public expressed a strong desire to utilize raised medians with landscaping throughout the corridor for purposes of aesthetics and continuity throughout the corridor.

For additional information on additional alternatives that were considered, but eventually rejected from further analysis, see Section 2.6 of the FEIS.

Russell Street Alternatives

Alternative 1
No Build
Alternative 1 is the No Build Alternative and would provide no improvements to Russell Street or the existing Russell Street Bridge. Routine maintenance would continue in accordance with City, County, and state policies. The No Build Alternative does not meet the Purpose and Need for the project, as maintaining the existing conditions will not provide the substantive safety and mobility improvements for all modes of travel, based on current and projected future traffic volumes.

Alternative 2
2+/4 Lanes with Roundabouts
Alternative 2 consists of varying lane configurations of two lanes; two lanes with a raised median or turn lane; and four lanes. Alternative 2 is very similar to the existing condition in lane configuration but includes the use of roundabouts at select intersections and limited use of raised medians to control through traffic and increase the functionality of the intersections and roundabouts. Alternative 2 does not meet the Purpose and Need for the project. As proposed, Alternative 2 will experience severe congestion almost immediately following construction (assuming construction occurs within the next couple of years). Consequently, Alternative 2 does not adequately meet a desired level and duration of mobility and safety improvements, as outlined in the Purpose and Need. (For additional information on Alternative 2 and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

Alternative 3
2+/4 Lanes with Roundabouts
Alternative 3 consists of varying lane configurations of two lanes with a raised median or turn lane and four lanes. Alternative 3 is similar to Alternative 2 in terms of lane configuration and intersection control but includes twice the length of raised median as compared to Alternative 2, and adds a median between Mount Avenue to South 8th Street. Alternative 3 does not meet the Purpose and Need for the project. As proposed,
Alternative 3 will experience severe congestion almost immediately following construction (assuming construction occurs within the next couple of years). Consequently, Alternative 3 does not adequately meet the desired level and duration of mobility and safety improvements, as outlined in the Purpose and Need. (For additional information on Alternative 3 and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

**Alternative 4 (Selected Alternative)**

**4+ Lanes with Signals**

Alternative 4 consists of four lanes with either a raised median or turn lane, with signal controlled intersections. Russell Street would have four travel lanes (two southbound and two northbound) plus a center turn lane or raised median throughout the corridor. Major intersections would be controlled by signals. Alternative 4 (Selected Alternative) best meets the Purpose and Need for the project, as compared to the other Build Alternatives that meet Purpose and Need, and has the least impact and cost as compared to the other Build Alternatives analyzed on Russell Street. Alternative 4 has the longest lifespan, by a considerable timeframe in comparison to the other build alternatives, by operating within the targeted Level of Service range up to 2023 and is the least expensive of the build alternatives at $45 million. (For additional information on Alternative 4 and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

**Alternative 5**

**4+ Lanes with Roundabouts**

Alternative 4 consists of four lanes with either a raised median or turn lane, with roundabouts at the bulk of the intersections. Alternative 5 is identical to Alternative 4 in terms of lane configuration (two southbound and two northbound, with raised medians and center turn lanes) on Russell Street. However, the major intersections would be controlled by roundabouts instead of traffic signals. The West Broadway Street intersection would remain signalized. Like Alternative 4, raised medians would be used throughout the Russell Street corridor to enhance the flow of through traffic. Alternative 5 meets the Purpose and Need for the project, but has an Adverse Effect on a greater number of historic properties as compared to other Build Alternatives on Russell Street. In addition, Alternative 5 is anticipated to reach congested levels by 2012 (assuming construction could be completed by that date). (For additional information on Alternative 5 and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

**Alternative 5-Refined**

**4+ Lanes with Modified Roundabouts**

The alignment and intersection treatments included in Alternative 5 were modified in an attempt to minimize impacts, particularly on Section 4(f) properties. Alternative 5-Refined includes a mix of signalized intersections, and smaller-diameter roundabouts than Alternative 5. Alternative 5-Refined meets the Purpose and Need for the project but has impacts to a greater number of historic properties which constitutes an impact to
Section 4(f) properties than Alternative 4. In addition, Alternative 5-R is anticipated to reach congested levels by 2012 (assuming construction could be completed by that date). (For additional information on Alternative 5-R and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

South 3rd Street Alternatives

Alternative A
No Build
Alternative A is the No Build Alternative and would provide no improvements to South 3rd Street. Routine maintenance would continue in accordance with City and State policies. The No Build Alternative does not meet Purpose and Need for the project in the sense that it will not address the present and long term need for providing substantive safety and mobility improvements for all modes of travel.

Alternative B
2 Lanes with Roundabouts
Alternative B has the same lane configuration as Alternative A (existing conditions/No Build), but includes bicycle lanes, boulevards, sidewalks, and roundabouts at select intersections. Alternative B meets the Purpose and Need for the project, but provides operational improvements for the least amount of time as compared to other alternatives examined on South 3rd Street. Traffic analysis found that the use of roundabouts on 3rd Street will result in capacity failure beginning as early as 2016, while the signalized options operate through the 2035 design year. (For additional information on Alternative B and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

Alternative C
2+ Lanes with Roundabouts
Alternative C includes two travel lanes (one in each direction), roundabouts at select intersections, and the use of raised medians through a majority of the corridor to control through traffic and increase the functionality of the intersections and roundabouts. Alternative C meets the Purpose and Need for the project, but provides operational improvements for a limited period of time, in comparison to the preferred alternative. Traffic analysis found that the use of roundabouts on 3rd Street will result in capacity failure beginning as early as 2016, while the signalized options operate through the 2035 design year. (For additional information on Alternative C and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

Alternative D
3+ Lanes with Signals
Alternative D would include one eastbound lane, but two westbound lanes due to the close proximity of the proposed traffic signals. The length of the additional lanes and tapers for the proposed signals at the Curtis Street/Schilling Street, Johnson Street and
Catlin Street intersections on South 3rd Street overlapped, thus becoming efficient to convert the overlapping tapers into a second westbound travel lane between Reserve Street and Russell Street. Alternative D meets the Purpose and Need for the project, but has greater impact with minimal gain in operational efficiency as compared to Alternative E (Selected Alternative). (For additional information on Alternative D and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

**Alternative E (Selected Alternative)**

**2+ Lanes with Signals**

Alternative E includes two travel lanes (one in each direction), the use of raised medians and center turn lanes, and signalized intersections. Alternative E (Selected Alternative) meets the Purpose and Need for the project, has the least impact, the least cost, and provides operational improvements for the greatest period of time as compared to the roundabout alternatives. Traffic analysis conducted for the proposed build alternatives found that the roundabout alternatives will fail to meet future capacity needs much earlier in comparison to the signalized intersection alternatives. The analysis found that the roundabout alternatives will fail shortly after construction in 2016, while the signalized intersection alternatives will operate at an acceptable level of service through the design year. (For additional information on Alternative E and its consideration, see Chapter 2.2 – Alternatives Analysis in the August 2011 Final Environmental Impact Statement.)

**Environmentally Preferred Alternatives**

Based on the analysis presented in the FEIS, Russell Street Alternative 4 and South 3rd Street Alternative E, the Selected Alternatives, are the Environmentally Preferred Alternatives since they have fewer impacts to commercial buildings and Section 4(f) properties, and provide the highest level of safety and mobility improvements when compared to other alternatives analyzed in the EIS.

Alternative 5 (refined) was rigorously explored as the locally preferred alternative due in large part to community preference for roundabout intersection control. During detailed analysis, it became apparent that Alternative 5 (even through refinement) would impose an impact on protected historic properties within the corridor that could be avoided with other alternatives. Due to unavoidable impacts to the historic properties at South 5th Street, Alternative 5 was not identified as the preferred alternative.

**4.0 FACTORS IN THE DECISION PROCESS**

With the exception of Alternatives 2 and 3 on Russell Street, all Build Alternatives meet the purpose of and need for the project. The No Build Alternative would not satisfy the Purpose and Need of the proposed project, as it does not address safety and operational needs for present and future capacity.
The Selected Alternatives would provide the greatest safety and mobility improvements with, predominantly, the least impact to the surrounding built and natural environment. The selection of Alternative 4 and Alternative E as the Selected Alternatives for this project is based on public input and relevant factors analyzed in the development of the FEIS and as discussed in this Record of Decision.

The No Build condition under Alternative 1 on Russell Street and Alternative A on South 3rd Street would include routine maintenance, but no reconstruction, widening or improvement in multi-modal mobility. As such, there would be no right-of-way acquisition, no physical impact to existing residential and business properties, and a relatively minor cost compared to the Build Alternatives. The primary difference in impacts and costs between the Build Alternatives is outlined below:

### Russell Street:

<table>
<thead>
<tr>
<th>Alt. 2</th>
<th>Alt. 3</th>
<th>Alt. 4</th>
<th>Alt. 5</th>
<th>Alt. 5 (refined)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• 9 Homes</td>
<td>• 9 Homes</td>
<td>• 11 Homes</td>
<td>• 18 Homes</td>
<td>• 10 Homes</td>
</tr>
<tr>
<td>• 13 Commercial Buildings</td>
<td>• 13 Commercial Buildings</td>
<td>• 10 Commercial Buildings</td>
<td>• 13 Commercial Buildings</td>
<td>• 11 Commercial Buildings</td>
</tr>
<tr>
<td>• 9.4(f) Properties</td>
<td>• 9.4(f) Properties</td>
<td>• 6.4(f) Properties</td>
<td>• 10.4(f) Properties</td>
<td>• 8.4(f) Properties</td>
</tr>
<tr>
<td>• 4.34 acres new right-of-way</td>
<td>• 4.87 acres new right-of-way</td>
<td>• 4.59 acres new right-of-way</td>
<td>• 5.65 acres new right-of-way</td>
<td>• 4.38 acres new right-of-way</td>
</tr>
<tr>
<td>• $48.3 million</td>
<td>• $48.8 million</td>
<td>• $45.0 million</td>
<td>• $52.6 million</td>
<td>• $46.5 million</td>
</tr>
</tbody>
</table>

### South 3rd Street:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• 1 Home</td>
<td>• 1 Home</td>
<td>• 0 Homes</td>
<td>• 0 Homes</td>
</tr>
<tr>
<td>• 4 Commercial Buildings</td>
<td>• 4 Commercial Buildings</td>
<td>• 3 Commercial Buildings</td>
<td>• 3 Commercial Buildings</td>
</tr>
<tr>
<td>• 2.38 acres new right-of-way</td>
<td>• 2.77 acres new right-of-way</td>
<td>• 3.62 acres new right-of-way</td>
<td>• 2.63 acres new right-of-way</td>
</tr>
<tr>
<td>• $12.2 million</td>
<td>• $12.7 million</td>
<td>• $12.5 million</td>
<td>• $11.4 million</td>
</tr>
</tbody>
</table>

Russell Street Alternatives 4 (Selected) and 5-Refined have very similar impacts and were considered preferable over Alternatives 2, 3 and 5. Alternative 4 (Selected) impacts the least number of commercial buildings and Section 4(f) properties, and has the least cost.

As detailed in the August 2011 Final Environmental Impact Statement, Alternatives 2 and 3 do not meet the Purpose and Need for the project, based on projections of severe congestion relatively soon following construction of either alternative. Alternatives 5 and 5-R both meet Purpose and Need, but the alternatives result in greater impacts to historic properties and Section 4(f) resources and both alternatives fail to provide adequate capacity for future traffic volume demands shortly after construction – each failing well before the design year. Consequently, based on the fact that Alternative 4 best satisfies the Purpose and Need (in comparison to the other Build Alternatives that meet Purpose and Need) to provide substantive safety and mobility...
improvements for all modes of travel within the corridor, has fewer Section 4(f) impacts, and less overall impact as compared to Alternative 5 and the refined Alternative 5, the four-lane roadway improvement with a center turn lane/raised median, and signalized intersections proposed under Alternative 4 is the Selected Alternative on Russell Street.

South 3rd Street Alternatives B, C, D and E (Selected) have very similar impacts. Alternative E (Selected) impacts the same number of residences and commercial buildings as Alternative D, but with less overall right-of-way and cost. Based on the fact that Alternative E satisfies the Purpose and Need to provide substantive safety and mobility improvements for all modes of travel within the corridor, and less overall impact and cost as compared to Alternatives B, C and D, the two-lane roadway improvement with a center turn lane/raised median, and signalized intersections proposed under Alternative E is the Selected Alternative on South 3rd Street.

5.0 MITIGATION & MEASURES TO MINIMIZE HARM

All practicable means to avoid and/or minimize environmental harm from the Selected Alternatives will be adopted and incorporated into project design and contract documents. General mitigation measures will compensate for direct, indirect, and cumulative impacts that might result from implementation of the Selected Alternatives. These measures are discussed in the FEIS Chapter 4, Environmental Consequences and Mitigation. The following subsections briefly describe the proposed mitigation measures to minimize harm and, where appropriate, proposed monitoring efforts associated with specific mitigation measures. Monitoring to ensure implementation of mitigation commitments in general is discussed in Section 8.0 of the FEIS. As the design process continues, additional specific measures for minimizing and avoiding impacts will be identified and incorporated into the project plans.

Due to annual funding limitations, the proposed project cannot be constructed as a whole. Consequently, reconstruction of Russell and South 3rd Streets is proposed to occur in phases. Construction projects will be programmed and completed as funds become available over the next several years. The mitigation measures outlined in the following section will be implemented concurrent or shortly thereafter (for example, the permanent restoration of riparian habitat cannot occur until after the Russell Street bridge is removed and replaced), as appropriate, in conjunction with the proposed phase of work.

The public has been afforded a number of opportunities to comment on proposed mitigation measures. The project team has utilized a diverse array of methods for affording the public an opportunity to comment on the project and proposed mitigation, including:

- Use of an agency and citizen advisory board. The board met on twelve occasions over the course of a two year period between 2004 and 2006 and was instrumental in developing a ranking matrix used to evaluate alternatives developed for the project.
- Public meetings. To date, eight public meetings have been conducted on the project, between 2000 and 2008.
Resource agency coordination and consultation. Conducted as appropriate, depending on the environmental consideration.

Door to door neighborhood canvasses. Conducted in 2006, this effort included a door to door visit with neighbors adjacent to the proposed project, as a means of updating residents and business owners on upcoming information meetings and gather feedback on the proposed action.

Coordination with the University of Montana. A presentation was made to the U of M’s Student Senate in 2007 to discuss a resolution the Student Senate passed in 2006, noting their opposition to the preliminary preferred alternative. The presentation was intended to clarify a number of misunderstandings and inaccurate information.

Media. Numerous news releases (primarily prior to upcoming public meetings) and postcards have been sent out to the public, as a means of providing updates on the project and upcoming public involvement opportunities.

Project website. The city maintains a webpage on the project, providing continual updates on project status.

Newsletters. Ten electronic newsletters have been sent out, during the development of the EIS, to provide additional opportunities to keep the public informed on the project status and upcoming public involvement opportunities.

Finally, the distribution of the Draft and Final Environmental Impact Statement documents have provided the primary opportunities to inform the public on the proposed project and the environmental analysis associated with each identified alternative. Following the distribution of each document, a public comment period has been provided. With respect to the proposed mitigation associated with the preferred alternatives, the public comments received to date have primarily influenced proposed mitigation and project elements associated with bicycle and pedestrian facilities and the aesthetics of the proposed project (for example, the use of landscaped medians).

Future opportunities for continued public involvement will exist through the updating of information on the city of Missoula’s project webpage.

**Russell Street Mitigation**

**Land Use**

None. No impacts requiring mitigation were identified.

**Farmlands**

None. No impacts requiring mitigation were identified.

**Social Conditions**

No impacts requiring mitigation were identified; however, the City and Montana Department of Transportation will meet with police, fire, and emergency service providers to coordinate access concerns for the construction phase.
Fair market value will be paid for properties to be acquired. Displaced residents will be relocated in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Economic Conditions
Fair market value will be paid for properties to be acquired. Displaced businesses will be compensated in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Parks and Recreation
Mitigation of the loss of green space will include additional landscaping and green space along Russell Street between Mount Avenue/South 14th Street and South 3rd Street. Trail impacts would be mitigated by providing three new grade separated crossings in the corridor.

Pedestrian and Bicycle Facilities
Bicycle and pedestrian access will be improved within the project corridor, therefore, no mitigation is necessary for the proposed project.

Air Quality
None. No impacts requiring mitigation were identified.

The contractor will be required to take reasonable precautions to control emissions of airborne particulate matter and to ensure combustion emissions comply with Administrative Rules of Montana (ARM) at ARM 17.8.304, 17.8.308, and 17.8.309.

Reasonable precautions may include some of the options outlined in various correspondence received from US EPA. The most recent correspondence, dated September 12, 2011, is included in the Appendix of this decision document. To the extent possible, reasonable precautions will be identified in the project design and included as requirements in the contract documents. However, some other reasonable precautions will need to be determined by the contractor.

Noise
No feasible or reasonable noise mitigation, as defined by FHWA regulations and MDT’s current Noise Policy, was identified for existing noise receptors. To minimize traffic noise impacts at planned or proposed developments within the project area, noise-compatible land uses and/or noise mitigation measures administered by the city of Missoula can be incorporated into future development. These suggested measures do not represent mitigation commitments by FHWA or MDT and were not relied upon for this decision.

Water Quality
Direct adverse impacts and indirect adverse effects to water resources and water quality of the area will be minimized or avoided using best management practices. As the design process continues, coordination with appropriate regulatory agencies will occur. Management of surface runoff may include a dry well system which may be subject to additional requirements. The final designs will comply with provisions of the Montana
Department of Environmental Quality’s impaired water body designation and total maximum daily loads for the Clark Fork River, the Missoula Valley Water Quality Ordinance for protection of the Missoula Valley Aquifer, and requirements related to the General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer Systems (MS4).

Potential adverse impacts associated with construction activities will include development of a re-vegetation plan, erosion control plan, stormwater pollution prevention plan, and coordination of water quality permits with the appropriate regulatory agencies.

**Wetlands**
None. No impacts requiring mitigation were identified.

**Water Body and Wildlife Habitat**
Mitigation in the Russell Street corridor includes raptor-proofing of power lines; preservation and restoration of riparian vegetation along the banks of the Clark Fork River, within the project area, following disturbance from the removal and replacement of the Russell Street Bridge; erosion and sediment control measures, in accordance with Federal, State, and Local requirements, will be implemented to reduce the amount and duration of sediment production, in order to minimize the introduction of sediment into the Clark Fork River, as a result of the project; revegetation of areas disturbed by construction and tree planting, in accordance with the city’s Urban Forestry policy.

**Floodplains**
The proposed Russell Street Bridge will increase the hydraulic opening associated with the structure. Additionally, the Shady Grove Trail undercrossing of the bridge will be designed above the 2-year flood elevation. The final design process will include hydraulic and floodplain analysis in order to ensure compliance with Federal Emergency Management Agency regulations.

**Threatened and Endangered Species**
To minimize potential for adverse impact to bull trout, Best Management Practices will be applied to reduce the amount of sediment entering the Clark Fork River. Formal consultation with the U.S. Fish and Wildlife Service has also concluded with a Biological Opinion for this project which outlines additional mitigation measures, including directions on the use of coffer dams, bridge removal techniques, restrictions on the use of work bridges, and a monitoring plan for bridge demolition and removal.

As part of the conditions of the Biological Opinion, monitoring efforts associated with bridge demolition and removal will be required. Monitoring efforts include ensuring no debris (to the maximum extent feasible) from the bridge removal enters the river; nor any material excavated during the construction of coffer dams enter the river.
Historic and Cultural Resources
A Historic American Building Survey will be conducted, an oral history of the Russell Street Neighborhood will be recorded, and large format photographs of the Russell Street Corridor will be taken before, during, and after construction.

Hazardous Materials
During the design and right-of-way phases of the proposed project, possible contamination sites will be investigated for the presence of hazardous materials. All buildings to be acquired within the project corridor will also be inspected for asbestos and lead contamination. A lead paint abatement plan for the Russell Street Bridge will need to be developed.

Visual Resources
Due to the overall positive impacts on visual resources, no impacts have been identified that require mitigation.

South 3rd Street Mitigation

Land Use
None. No impacts requiring mitigation were identified.

Farmlands
None. No impacts requiring mitigation were identified.

Social Conditions
No impacts requiring mitigation were identified; however, the City and Montana Department of Transportation will meet with police, fire, and emergency service providers to coordinate access concerns for the construction phase.

Fair market value will be paid for properties to be acquired. Displaced residents will be relocated in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Economic Conditions
Fair market value will be paid for properties to be acquired. Displaced businesses will be compensated in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Parks and Recreation
None. No impacts requiring mitigation were identified.

Pedestrian and Bicycle Facilities
Bicycle and pedestrian access will be improved within the project corridor, therefore, no mitigation is necessary for the proposed project.
Air Quality
None. No impacts requiring mitigation were identified.

The contractor will be required to take reasonable precautions to control emissions of airborne particulate matter and to ensure combustion emissions comply with Administrative Rules of Montana (ARM) at ARM 17.8.304, 17.8.308, and 17.8.309.

Reasonable precautions may include some of the options outlined in various correspondence received from US EPA. The most recent correspondence, dated September 12, 2011, is included in the Appendix of this decision document. To the extent possible, reasonable precautions will be identified in the project design and included as requirements in the contract documents. However, some other reasonable precautions will need to be determined by the contractor.

Noise
There is an opportunity for a sound barrier between Garfield and Catlin Streets. A barrier, however, will impact access to the first row of mobile homes along the south side of South 3rd Street. A final decision on the installation of the abatement measure will be made during the final design process.

Water Quality
Direct adverse impacts and indirect adverse effects to water resources and water quality of the area will be minimized or avoided using best management practices. As the design process continues, coordination with appropriate regulatory agencies will occur. Management of surface runoff may include a dry well system which may be subject to additional requirements. The final designs will comply with provisions of the Montana Department of Environmental Quality’s impaired water body designation and total maximum daily loads for the Clark Fork River, the Missoula Valley Water Quality Ordinance for protection of the Missoula Valley Aquifer, and requirements related to the General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer Systems (MS4).

Potential adverse impacts associated with construction activities will include development of a re-vegetation plan, erosion control plan, stormwater pollution prevention plan, and coordination of water quality permits with the appropriate regulatory agencies.

Wetlands
None. No impacts requiring mitigation were identified.

Water Body and Wildlife Habitat
None. No impacts requiring mitigation were identified.

Floodplains
None. No impacts requiring mitigation were identified.
Threatened and Endangered Species
None. No impacts requiring mitigation were identified.

Historic and Cultural Resources
None. No impacts requiring mitigation were identified.

Hazardous Materials
During the design and right-of-way phases of the proposed project, possible contamination sites will be investigated for the presence of hazardous materials. All buildings to be acquired within the project corridor will also be inspected for asbestos and lead contamination.

Visual Resources
Due to the overall positive impacts on visual resources, no impacts have been identified that require mitigation.

6.0 SECTION 4(f) EVALUATION

Section 4(f) of the Transportation Act of 1966 (49 USC 303) declares that “[i]t is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites.”

Section 4(f) specifies that “[t]he Secretary [of Transportation] shall not approve any program or project (other than any project for a park road or parkway under Section 204 of this title) which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance as determined by the Federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State, or local significance as so determined by such officials unless:

1) there is no feasible and prudent alternative to the use of such land; and

2) such program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

Further, in 2005, Congress amended Section 4(f) as part of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users. This amendment authorizes the Federal Highway Administration to approve a project that results in a de minimis impact to a Section 4(f) resource without the evaluation of avoidance alternatives typically required in a Section 4(f) Evaluation.
Through consultation with the Montana State Historic Preservation Office during the Section 106 of the National Historic Preservation Act process, it was determined that the Selected Alternatives for Russell and S. 3rd Streets will have the following effects:

- **No Adverse Effect** to the Bitterroot Branch of the Northern Pacific Railroad (24MO718). This site would be impacted by the Alternative 4 (Selected). Based on the fact that the site would remain largely intact, and impacts would be limited to a wider at-grade railroad crossing at the same existing location, these impacts have been determined to have on the historic railroad but still constitute a Section 4(f) “use” of the resource.

- Two historic residences (24MO811 and 24MO819) lie in very close proximity to the existing alignment and Alternative 4 (Selected) would require removal of the structures. This permanent incorporation of the site into the transportation facility results in an **Adverse Effect** to these sites, and a Section 4(f) “use” of the resource.

- Alternative 4 (Selected) avoids impact to the residential structure in the northwest quadrant of the South 5th Street intersection with Russell Street (24MO800) but would require encroachments on the property resulting in a Section 4(f) “use.” The very minor encroachment results in a **No Effect** determination.

The FEIS, Appendix C provides documentation of the coordination with the State Historic Preservation Officer according to Section 106 of the National Historic Preservation Act.

Alternative 4 has an Adverse Effect on two historic properties, and a *de minimis* effect on three trail crossings, a historic railroad, and one property. Alternative 4 requires the least physical impact on historic structures and right-of-way encroachments as compared to the other Build alternatives.

Two residential properties (24MO811 and 24MO819) protected by Section 4(f) would be fully acquired under all of the Build alternatives because the new right-of-way bisects the historic structures themselves.

In addition to the historic sites noted above, the Federal Highway Administration has made a *de minimis* finding on the impacts to 24M0800, as well as three recreational trails, and the railroad currently intersected by Russell Street. Based on the analysis in the FEIS, Chapter 5 *Section 4(f) Evaluation*, Alternative 4 has the least impact on properties protected by Section 4(f), and is the Selected Alternative.

All required alternatives have been evaluated and Alternative 4 (Selected) includes all possible planning to minimize harm which will be incorporated in this proposed project. This document is submitted pursuant to 49 U.S.C. 303 and in accordance with the provisions of 16 U.S.C. 470f.
7.0 COMMENTS ON THE FINAL EIS

A Notice of Availability (NOA) of the Final EIS was published in the Federal Register on August 19, 2011. A news release announcing the availability of the Final EIS was submitted to area newspaper, television and radio news outlets. Interested party letters and postcards announcing the availability of the Final EIS were mailed to those on the project mailing list on August 18, 2011. In addition, this information was made available through the Internet on the MDT web site at: ([http://www.mdt.mt.gov/pubinvolve/eis_ea.shtml](http://www.mdt.mt.gov/pubinvolve/eis_ea.shtml))

Display ads were purchased to announce the availability of the Final EIS in the Missoula Independent. The advertisements ran on August 18, August 25 and September 15, 2011.

The Final EIS was available for a 30-day public review period beginning August 19, 2011 and ending September 20, 2011. The Final EIS was distributed for review to the federal, state and local agencies listed in the Final EIS, Chapter 8, Distribution List, and to members of the public at their request. The Final EIS was made available for review at the following public viewing locations:

- Missoula Public Library, 301 E Main St, Missoula
- Maureen and Mike Mansfield Library, 32 Campus Drive #9936, Missoula
- MDT Missoula District Office, 2100 W Broadway, Missoula
- MDT Helena Headquarters, 2701 Prospect Avenue, Helena
- City of Missoula Public Works Department, 435 Ryman St., Missoula

Five written comments were received from the general public and various agencies during the 30-day review period. Comments were received from:

- Mr. Tim Zalinger
- U.S. Environmental Protection Agency, Region 8 Office
- Mr. Bob Giordano, Missoula Institute of Sustainable Transportation
- Mr. Ray Vandelac
- Ms. Virginia Vincent

Appendix A of this Record of Decision contains copies of the comments received and the associated responses.
8.0 CONCLUSION

FHWA selects Alternative 4 for Russell Street and Alternative E for South Third Street because, as outlined in this Record of Decision, Alternative 4 best meets the project’s purpose and need; has fewer Section 4(f) impacts, and less overall impacts, in comparison to the other alternatives. Alternative E minimizes the right of way impacts; is the least expensive in comparison to the other build alternatives; and provides improved safety, as compared to the No Build alternative. FHWA has determined that the Montana Department of Transportation and city of Missoula have incorporated all practicable means to avoid or minimize environmental harm into the selected alternatives. FHWA will ensure the commitments outlined herein and in the Final EIS will be implemented as part of the project design, construction, and post-construction monitoring.

Commitments outlined herein will be incorporated, as appropriate, in to the construction plans and specifications for this project. FHWA ensures that commitments are implemented on a project through the review of project construction plans and specifications, as well as periodic inspections during construction. Inspections generally occur during the construction of the project and may involve both a review of project construction documentation, in addition to an observation of construction activities.
APPENDIX A – Comments Received on Final Environmental Impact Statement

This appendix includes written comments received on the Final Environmental Impact Statement issued on August 18, 2011 and circulated for public review until September 19, 2011. Comments are presented in the order received.

Responses to these comments are included on the right side of the page.

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Appendix A - Comments Received on Final Environmental Impact Statement
Thank you for your continued participation in this project.
Appendix A – Comments Received on Final Environmental Impact Statement

Thank you for your written concurrence.

The project sponsors continue to believe that adherence to the adopted Best Management Practices, which will continue to evolve over time, provide the most reasonable approach to ensuring compliance with air quality standards and maintaining flexibility and cost-effectiveness in construction contracting.

The EPA supports the FHWA, MDT, and City of Missoula efforts to improve safety and mobility in the Russell Street and South 3rd Street corridors, particularly efforts to mitigate environmental impacts of roadway reconstruction and to increase opportunities for pedestrian and bicycle travel. We appreciate receipt of the responses to EPA comments on the draft EIS provided in Appendix H of the FEIS, particularly the additional information city and state officials have provided to EPA regarding the issue of PM-10 hot spot analysis. As noted in the FEIS, the EPA concurs that a PM-10 qualitative hot spot analysis is not required.

The FEIS states that to minimize dust from construction activities that would contribute to ambient concentrations of particulate matter, the construction contractor will only be required to comply with Montana DOT Best Management Practices (or BMPs) and the Montana Pollutant Discharge Elimination System Construction General Permit (page 4-56). EPA requests that appropriate mitigation measures for PM, diesel emissions, and other Mobile Source Air Toxics (MSATs) be included in the Record of Decision (ROD). As noted in our October 14, 2008 comments on the DEIS (see Appendix H of the FEIS, pages H-137 through H-146), EPA stated in comment number 11 (the FEIS references this comment as “117-K”):

“We believe the FEIS should identify the specific actions to be taken to minimize dust, and equipment emissions from construction vehicles and roadway vehicles and other activities that will disturb the soil. This will enable the public to better understand efforts to reduce dust emissions during construction. We also recommend that the FEIS describe methods that will be used to minimize tracking of soil and mud from unpaved areas during construction to avoid particulate matter pollution from the re-entrainment of dried mud and soil by vehicles passing through and near the project area.”

The response to this comment in the FEIS (Appendix H, page H-145) states the following:

“The EIS references Best Management Practices, which provides more flexibility at this stage of the project development process. This project will likely be constructed in phases over several years, and the construction techniques and abatement measures may change. Identifying specific measures in the EIS limits the ability of the contractor to provide competitive bids and limits the ability to employ new techniques developed after the EIS is completed.”

EPA believes that exposure to particulate matter (PM$_{2.5}$ and PM$_{10}$), diesel emissions, and MSATs may occur for a period of years with this project and specific mitigation measures should be included in the ROD. These specific measures would be a starting point for mitigation of particulate matter and diesel engine/MSAT emissions and can always be augmented as new techniques are developed. Mitigation measures for air quality construction impacts should include, but are not limited to:

- Requiring heavy construction equipment to use the cleanest available engines or to be retrofitted with diesel particulate control.
- Requiring diesel retrofit of construction vehicle engines and equipment as appropriate.
Thank you for working with the project team to identify appropriate Best Management Practices for storm water runoff.
If you have questions regarding our input please feel free to call Mr. Stephen Potts of my staff in Missoula at 406-329-3313 or in Helena at 406-457-5022. Questions regarding our air quality comments should be directed to Mr. Tim Russ in Denver at 303-312-6479. Thank you for the opportunity to review and comment during the NEPA process.

Sincerely,

[Signature]

Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA, SEPR-N, Denver
    Gregg Wood, City of Missoula Public Works, Missoula

Thank you for your continued interest and participation in the project.
Comment noted. The graphics are general in nature and are intended to identify the parcel boundaries of those properties where structures (homes, garages, sheds) lie within the construction limits. These impacts are preliminary and potentially overestimate the level of impact.

Comment noted. The intersection at Russell Street and West Broadway Street will be improved with the proposed project, and signal timing will be adjusted accordingly.

Thank you for your interest and participation in this project.
Appendix A - Comments Received on Final Environmental Impact Statement

Comment 3

Submitted: 09/03/2011 09:10:42
Name: Ray Vandelac
Address Line 1: PO Box 1355
City:Lolo
State/Province: MT
Postal Code: 59847

Comment or Question:
I feel option 4 and D are the ONLY overall viable options to solve this mess. I have driven these roads, probably hundreds of times, and am glad to see action FINALLY started. Russell, as a four lane road from W. Broadway to Brooks St. will not only move traffic more smoothly thru this main corridor, but MAY help remove some traffic fro Reserve St. AND will surely improve flow on W. Broadway. Anything less than 4 lanes for Russell and 3 for S. Third will only continue the problem. This is a LONG overdue project and needs to be completed, ASAP, regardless of the cost.

Thank you for your comment and participation in the project.
The Final Environmental Impact Statement issued for this project is the result of multiple years of planning and preliminary design including numerous opportunities for public input through workshops, information meetings, and formal public hearings. The analysis included rigorous examination by an interdisciplinary team of qualified transportation and environmental experts at the federal, state and local level, as well as specialized consultants who worked collaboratively to develop and analyze the effectiveness and impacts of the alternatives on both Russell Street and South 3rd Street.

The preliminary design is based on both regional modeling developed for the Missoula Transportation Plan Update, as well as detailed traffic analysis conducted on each specific alternative presented in the Final Environmental Impact Statement. The detailed analysis conducted on alternatives developed or modified since circulation of the Draft Environmental Impact Statement is also included in Appendix G of the Final Environmental Impact Statement.

Please refer to Chapter 1 of the Final Environmental Impact Statement for a discussion of the Purpose and Need for improvements to this principal arterial in the Missoula transportation network. As noted, this crossing of the Clark Fork is important for bicyclists, pedestrians, two transit routes, and vehicular travel along Russell Street.
The proposed project includes improvements for all modes: bicyclists, pedestrians, transit, and vehicular travel. Portions of the improvements recommended in the *City of Missoula – 2010 Case Statement for Active Transportation* report referenced are included in the Preferred Alternatives.

Both the Long Range Transportation Plan Update and the detailed analysis conducted for this proposed project included coordination with the City of Missoula Office of Planning and Grants, Mountain Line, Missoula in Motion, and the Missoula Ravalli Transportation Management Association to ensure full consideration of transportation demand management measures such as those suggested in the comment. As noted in Section 2.6 of the Final Environmental Impact Statement, these strategies are accounted for in the regional travel demand model, and cannot independently address the purpose and need for improvements in the Russell Street and South 3rd Street corridors.

The detailed analysis conducted for this project indicates an improvement in both safety and mobility.

The improvements proposed on Russell Street and South 3rd Street will provide immediate and long-term benefits when compared to the existing conditions. Without a substantial change in travel behavior in the Missoula area, the proposed improvements will be suitable for the foreseeable future.

Thank you for your comment and interest in the project.
Record Of Decision

Comment 5

-----Original Message-----
From: Bob Giordano [mailto:mist@strans.org]
Sent: Monday, September 19, 2011 10:12 AM
To: Gregg Wood
Subject: Russel FEIS comments from MIST

September 19th, 2011

Mr. Wood,

Please accept these comments from MIST on the Russell Street FEIS:

5-A Traffic is dropping on Russell Street if we look at the last available 10 year data trend. A 3-lane Russell with single lane roundabouts would, thus, work well.

Russell St. ADT between S. 2nd St. & S. 3rd St:

2000: 24,320
2009: 21,070
(from the City of Missoula website)

Single lane roundabouts would be substantially safer than large signalized intersections, in our opinion.

5-B Regardless of number of lanes, we think 6' or 7' bike lanes, 6' to 8' sidewalks, good accessible trails and trail connections, increased bus service and bus pull outs are all important to include in this project.

5-C If trail undercrossings are utilized, we feel it is very important to also have at-grade crossings, for livability, accessibility and human scale purposes.

5-D We would also like to see some non-asphalt and non-concrete alternatives be explored for the road, trail and sidewalk surfaces. We suggest looking at pine resin products, soil stabilizer products and various poly pavements for example. Clay paving stones, with nibs for interlock and permeability would be another alternative.

5 Based largely on public comment, additional analysis of 3-lane configurations with single-lane roundabouts were analyzed between issuance of the Draft and Final Environmental Impact Statements. (Please refer to Appendix G of the Final Environmental Impact Statement for a summary). None of the analysis conducted to date suggests that a three-lane configuration with single-lane roundabouts on Russell Street can accommodate the projected demand, and may fail with existing traffic volumes.

5-B The current preliminary design includes 5.5 foot bike lanes (consistent with national standards), as well as accessible trails and trail connections. Decisions on increased transit service will be made by Mountain Line and accommodated by bus pullouts included in the proposed project.

5-C In addition to the grade-separated crossings, multiple at-grade crossings would be perpetuated along both the Russell Street and South 3rd Street corridors.

5-D The Montana Department of Transportation and Federal Highway Administration will examine the viability of these various surfacing treatments in final design.
Appendix A - Comments Received on Final Environmental Impact Statement

We strongly propose alternatives to asphalt primarily to save money in the long term yet more importantly for improved community health and reduced use of fossil fuels. While concrete pavers may be a possibility, we are concerned about the amount of energy and greenhouse gas emissions associated with concrete.

We are also concerned that the three pages of written comments we submitted at the public hearing are nowhere to be found in the FEIS, only our verbal testimony. We spent considerable time immediately after the hearing putting together detailed comments.

Overall, though, we appreciate the amount of work that has gone into this project so far.

Please continue to make Russell Street the best possible street for the community.

Thanks,
-Bob Giordano,

Bob Giordano, Executive Director
Missoula Institute for Sustainable Transportation www.strans.org, mist@strans.org, 406.880.6834

It was made apparent in the weeks following the Public Hearing in 2008 that no comments were received from MIST on the Draft Environmental Impact Statement. The project team attempted to work with you to capture the essence of your comments and believes opportunity has been provided to engage in the decision-making process. We regret that your apparent detailed comments were not received and appreciate your time in preparing these comments on the Final Environmental Impact Statement.

Thank you for your comment and your continued participation in this project.