



March 22, 2007

Mark Schrader
Environment and Right of Way Engineer
Federal Highway Administration
1471 Interstate Loop
Bismarck, North Dakota 58503

Re: Little Missouri River Crossing
PCN# 16970
Project # FHO-02-24(001)
Billings County, North Dakota

Dear Mr. Schrader:

Dacotah Chapter of the Sierra Club members recreate on the three units of Theodore Roosevelt National Park (Park) and the surrounding Little Missouri National Grasslands (LMNG) as individuals and as a group.

North Dakota's Badlands provide recreational opportunities found nowhere else in the state, or for that matter, the country. But, there are becoming fewer and fewer places to go to avoid the sights and sounds of everyday life.

Oil and gas development has increased at an unprecedented rate. There are well over 3,000 miles of roads on the LMNG. You will never be more than 4 miles from a road no matter where you go on the 1,000,000 acres of the LMNG.

Billings County has now proposed building another road and a bridge or a cement low-water crossing across the Little Missouri State Scenic River to facilitate oil truck traffic.

Dacotah Chapter opposes this proposal for the following reasons:

- 1) The Little Missouri State Scenic River Act prohibits the damming, filling, or dredging of the river. All of which will happen with this project.
- 2) Billings County has not presented a significant "need" for this road and crossing. With a decline in the number of ranching families in the area there is actually less of a need for this project to accommodate mail delivery, school buses, or emergency services.

- 3) The view from the Elkhorn Ranch National Park Unit will be impacted as well as an increase in noise pollution from truck traffic. Sound travels far along a river valley.
- 4) The U.S. Forest Service recently acquired the Eberts Ranch, once part of President Theodore Roosevelt's historic Elkhorn cattle ranch, as an addition to the LMNG in order to protect the area's scenic and historic significance. One of the routes being considered for this project would put a road and low-water crossing through the heart of this new acquisition thereby completely sabotaging that popular preservation effort.
- 5) An ice and snow covered low water crossing in winter increases the danger of oil spills from truck accidents that would impact the river and the surrounding public land.
- 6) With roads come increased housing developments which in turn require an ever-increasing amount of infrastructure to support them. A "reasonably foreseeable development" analysis to determine the impacts from this potential increased development should be included in the Environmental Impact Statement (EIS).
- 7) This proposal presents a cost to taxpayers with no obvious benefit to the public. A "cost/benefit analysis" should be completed, and the public given a chance to comment on it, before this project moves forward.

Teddy Roosevelt developed his conservation ethic during the time he spent hunting and ranching along the Little Missouri River valley. He often said that if not for the "strenuous life" spent in North Dakota he would not have become president. Right now, one can sit at the foundation of Roosevelt's Elkhorn cabin and see, hear, and experience the sights, sounds, and smells that he experienced. You can also feel the tranquility he felt in that natural setting. Oil traffic across the Little Missouri River would completely destroy that experience.

Billings County has not proven a compelling need for a road and crossing. Making life easier for oil companies is not a public purpose or need. The oil industry has stated that a crossing will save them money in transportation costs but, this does not offset the cost to the general public in terms of the loss of wildlife habitat, solitude, and the pastoral setting that, for most North Dakotans, defines the Little Missouri River valley. Additionally, without a compelling need, how can The Federal Highway Administration and the North Dakota Department of Transportation justify spending tax dollars on this project when there are so many other priority projects across the state that deal with safety and essential maintenance issues and do not negatively impact a national park, a national grasslands, and a state scenic river?

Dacotah Chapter finds the purpose and need for this project lacking and urges the Federal Highway Administration to take “No Further Action.”

Thank you for the opportunity to comment on this project.

Sincerely,

Wayde Schafer
Regional Representative
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