FHWA-ID-EIS-12-01-F

Final Environmental Impact Statement (FEIS) and Final Section 4(f) Evaluation US-95 Thorncreek Road to Moscow

Milepost 337.67 to Milepost 344.00; Latah County, Idaho
Project No. DHP-NH-4110 (156); Key No 9294

Submitted Pursuant to:
40 CFR 1500-1508; 23 CFR 771; 49 USC 303; 23 USC 109(h); 23 USC 128; 23 USC 138
by
U.S. Department of Transportation (USDOT); Federal Highway Administration (FHWA)
and
Idaho Transportation Department (ITD)
and
Cooperating Agency
U.S. Army Corps of Engineers (USACE)
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7/28/15
Date of Approval:

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Abstract:
The US-95 Thorncreek Road to Moscow project is located in Latah County, Idaho. The project begins near Thorncreek Road (MP 337.67) and continues north for approximately 6.34 miles, ending at the South Fork Palouse River Bridge (MP 344.00). The purpose of this project is to improve the safety and capacity on this segment of US-95. This FEIS analyzes the benefits and effects of the No Action and three Action Alternatives (Modified W-4, C-3 and E-2) on the natural and human environment. It makes corrections to the DEIS, presents new information and responds to public comments. It also identifies the Preferred Alternative and mitigation measures.
Any comments on this FEIS must be received by, September 14 2015 and should be sent to:

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TECHNICAL REPORTS

The following technical reports were prepared to evaluate the existing conditions and alternative effects during the DEIS preparation. Additional reports prepared after the DEIS publication are added under the FEIS Technical Reports.

DEIS Technical Reports

The following technical reports were prepared which support the DEIS and were circulated with the DEIS.

BIOLOGICAL ASSESSMENT TECHNICAL REPORT

- Biological Assessment, Thorncreek Road to Moscow Highway Construction Project (ITD 2007a)

COMMUNITY IMPACT TECHNICAL REPORTS

- Community Profile Update (HDR 2011a)
- Environmental Justice Update (HDR 2011b)
- Induced Development Update (HDR 2011c)
- Community Impact Assessment Update (HDR 2011d)
- Community Impact Assessment (HDR 2006)
- Community Profile & Induced Development (HDR 2005a)
- Environmental Justice (HDR 2005b)

CULTURAL RESOURCES TECHNICAL REPORTS

- Historic Resources Survey Update to An Historic Buildings/Structures Survey (Cardno-Entrix 2011)
- Cultural Resources Surveys; Short Report 898 (AHS 2006)
- An Historic Buildings/Structures Survey; Short Report 832 (Sharley 2005)

FARMLAND TECHNICAL REPORT

- Farmland Protection Policy Act (Haagen 2006)

FLOODPLAIN TECHNICAL REPORT

- Hydraulic Study for Affected Floodplains on Alternatives Carried Forward (ITD 2012b)

HAZARDOUS MATERIALS TECHNICAL REPORTS

- Phase I Database Inquiry 3134591.1s (EDR 2011)

- Hazardous Materials Scan (North Wind 2005)

TRAFFIC NOISE TECHNICAL REPORT

- Analysis of Noise Environment and Impacts (Bionomics 2012)

SCREENING OF ALTERNATIVES TECHNICAL REPORT

- Alignment Screening 1-US-95 Thorncreek Road to Moscow; Alignment Screening Report (ITD 2006)

SAFETY TECHNICAL REPORT

- US-95 Thorncreek Road to Moscow AASHTO Highway Safety Manual Analysis for Alignments Carried Forward (ITD 2012a)

VEGETATION TECHNICAL REPORTS

- A Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between Uniontown Cutoff and Moscow (Lass & Prather 2007)
- Biological Evaluation of Plant Species and Communities of Conservation Concern in the US Highway 95 Thorncreek Road to Moscow Project Area (Lichthardt 2005)

VISUAL RESOURCES TECHNICAL REPORT

- Final Visual Resources Report (Visual Genesis 2005)

WEATHER TECHNICAL REPORT

- Final Report for Weather Analysis of Proposed Realignments (Qualls 2005)

WETLAND DELINEATION TECHNICAL REPORT

- Wetland Delineation Technical Report (Gilmore 2012)

WILDLIFE TECHNICAL REPORTS

- Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow (Sawyer 2010)
- Final Review of Wildlife Mitigation for the Thorncreek Road to Moscow Highway Development Project (US-95) (Ruediger 2007)
- General Wildlife Assessment (IDFG 2006)
- Biological Evaluation on the Potential Impacts of Corridor Alternatives from Thorncreek Road to Moscow on Large Ungulates (Melquist 2005a)

- Biological Evaluation on the Potential Impacts of Corridor Alternatives from Thorncreek Road to Moscow on Long-eared Myotis and Pygmy Nuthatches (Melquist 2005b)

FEIS Technical Reports

The following additional technical reports were prepared which support the FEIS. All reports are circulated with the FEIS with the exception of *A Cultural Resources Probability Study for Idaho Transportation Department's Proposed US 95 Thorn Creek Road to Moscow, Stage 1 Project, Latah County, Idaho* (Sharley and Gough, 2005). This was not released due to the confidentiality of the content.

BIOLOGICAL ASSESSMENT TECHNICAL REPORT

- Memo Documenting Resurvey for Spalding's Catchfly along US-95 Thorncreek to Moscow Project Area, (Lichthardt 2014)
- Updated USFWS Species List (USFWS 2015)

CULTURAL RESOURCES TECHNICAL REPORT

- Addendum A to the Cultural Resource Survey Reports for Modified W-4 Alternative (ITD 2015c)
- A Cultural Resources Probability Study for Idaho Transportation Department's Proposed US 95 Thorn Creek Road to Moscow, Stage 1 Project, Latah County, Idaho (Sharley and Gough, 2005)-Not circulated to the public

FLOODPLAIN TECHNICAL REPORT

- Hydraulic Study for Affected Floodplains on Alternatives Carried Forward (ITD 2014c)

VEGETATION TECHNICAL REPORT

- Memo: Effects Analysis of the US Highway 95-Thorncreek Road to Moscow Project for Plant Species and Communities of Conservation Concern (Lichthardt 2008)

WATER RESOURCES TECHNICAL REPORT

- Hydrogeologic Analysis of Alternative Alignments of Highway 95 from Thorncreek to Moscow (Ralston 2014)

TRAFFIC NOISE TECHNICAL REPORT

- Addendum to the Analysis of Noise Environment and Impacts (ITD 2015a)
- Analysis of Noise Environment and Impacts (Bionomics 2012)-updated in 2015 to correct right-of-way impacts)

SAFETY TECHNICAL REPORT

- Idaho Transportation Board Agenda and Minutes and sample of ITD 0606 Form.
- US-95 Thorncreek Road to Moscow; AASHTO Highway Safety Manual Analysis on Alternatives Carried Forward (ITD 2013)
- Addendum 1 US-95 Thorncreek Road to Moscow AASHTO Highway Safety Manual Analysis on Alternatives Carried Forward. (ITD 2015b)
- US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward (ITD 2014a)
- Addendum 1 US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward. (ITD 2014b)

WEATHER TECHNICAL REPORT

- Weather Analysis and Climate Study for US Highway 95, Thorncreek Road to Moscow, Four Proposed Alternatives, No-Build, W-4, C-3 and E-2 (Qualls 2014)

DEIS PUBLIC COMMENTS

- US-95 Thorncreek Road to Moscow, Draft Environmental Impact Statement Copies of Public Comments

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AASHTO	American Association of State Highway and Transportation Officials
acc/mvm	accidents per million vehicle miles
ACHP	Advisory Council on Historic Preservation
ADT	Average Daily Traffic
AIRFA	American Indian Religious Freedom Act
Amsl	Above mean sea level
APE	Area of Potential Effect
AST	Above-ground Storage Tank
BA	Biological Assessment
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CGP	Construction General Permit
CLOMR	Conditional Letter Of Map Revision
CO	Carbon monoxide
CO_2	Carbon dioxide
CRP	Conservation Reserve Program
CWA	Clean Water Act
dBA	A-weighted decibels
DEIS	Draft Environmental Impact Statement
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	United States Environmental Protection Agency
EQIP	Environmental Quality Incentives Program
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FINDS	Facility Index System
FIRM	Flood Insurance Rate Map
FPPA	Farmland Protection Policy Act
FR	Federal Register
ft	Feet
GHG	Greenhouse Gas

Acronym	Definition
GIS	Geographic Information System
GRP	Grassland Reserve Program
Ha	Hectare
HAL	High Accident Location
HTF	Highway Trust Fund
I/F	Injury/Fatality
ICDC	Idaho Conservation Data Center
IDAPA	Idaho Administrative Procedures Act
IDEQ	Idaho Department of Environmental Quality
IDFG	Idaho Department of Fish and Game
IDT	Inter-disciplinary Team
IDWR	Idaho Department of Water Resources
ITD	Idaho Transportation Department
ITIP	Idaho Transportation Investment Program
Leq	Hourly-equivalent sound pressure levels
$L_{eq}(h)$	Hourly equivalent noise level in a-weighted decibels (dBA)
LIP	Landowner Incentives Program
LOMR	Letter Of Map Revision
LOS	Level of Service
LUST	Leaking Underground Storage Tank
LWCFA	Land and Water Conservation Fund Act
m	meter
MAP-21	Moving Ahead for Progress in the 21st Century
MP	Milepost
Mh	Moderately high
mpg	miles per gallon
mph	miles per hour
MSAT	Mobile Source Air Toxics
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NAFTA	North American Free Trade Agreement
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHS	National Highway System
NLHD	North Latah County Highway District

Acronym	Definition
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice Of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
PDO	Property Damage Only
PEM	Palustrine Emergent
PFO	Palustrine Forested
PFW	Partners for Fish and Wildlife
PM	Particulate Matter
PSF	Plant Sciences Farm
PSS	Palustrine Scrub-Shrub
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
ROW	Right-of-way
RV	Recreational Vehicle
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SCC	Species of Conservation Concern
SDWA	Safe Drinking Water Act
SGCN	Species of Greatsest Conservation Need
SH	State Highway
SHPO	State Historic Preservation Office
STP	State Transportation Plan
SWPPP	Stormwater Pollution Prevention Plan
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act for the 21st Century
THPO	Tribal Historic Preservation Office
TMDL	Total Maximum Daily Load
TNM	Traffic Noise Model
TSM	Transportation System Management
US	United States
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank

Acronym	Definition
VMT	Vehicle Miles Traveled
WCS	Idaho Comprehensive Wildlife Conservation Strategy
WRIA	Water Resource Inventory Area

EXECUTIVE SUMMARY

ES.1 Introduction

This document is being prepared to comply with the National Environmental Policy Act of 1969 (NEPA) as amended. The Draft Environmental Impact Statement (DEIS) was prepared and made available for public comment from January 4, 2013 to February 25, 2013. The comment period was extended to March 25, 2013. A public hearing was held in Moscow on January 23, 2013. Approximately four hundred comments were received during the DEIS comment period. A summary of public involvement activities is described in Chapter 7, Public Involvement and Agency Coordination.

The US-95 Thorncreek Road to Moscow Final Environmental Impact Statement (FEIS) has been prepared in accordance with the FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents (FHWA 1987) and FHWA and US Department of Transportation (USDOT) Right-of-way and Environment; Environmental Impact and Related Procedures [23 CFR 771].

The FEIS presents new, changed, and corrected information since the DEIS was published. It addresses substantive public comments, provides rationale for identifying the Preferred Alternative, and lists mitigation measures. The primary changes since the DEIS are listed below:

- Revised the W-4 Alternative to avoid a Section 4(f) property and reflected the change throughout the FEIS. It is now presented as the Modified W-4 Alternative
- Revised the Section 4(f) Evaluation to include the Modified W-4 Alternative
- Prepared an addendum to the Cultural Resource Survey Reports to evaluate the Modified W-4 Alternative
- Prepared Chapter 10, Response to Comments on the DEIS
- Revised Weather Analysis
- Revised Safety Analysis
- New Hydrogeologic Analysis
- New Mobility and Road User Cost Reports
- Updated Noise Analysis
- Provided additional wildlife information (bumblebees, grassland birds, pygmy nuthatch, and giant Palouse earthworm)
- Provided additional information regarding CRP land and matrix habitats
- Provided additional information regarding invasive plants
- Revised and clarified residential and business impacts
- Revised descriptions of access
- Updated public involvement activities

- Finalized mitigation measures
- Provided additional detail regarding the vertical and horizontal alignment for the alternatives.
- Provides public comments on the DEIS and responses to the comments

The FEIS provides the lead agencies (FHWA and ITD), and a cooperating agency (the US Army Corps of Engineers (USACE)), with an in-depth analysis of the environmental effects of the alternatives so that an informed decision can be made. This FEIS is also a public disclosure of the potential environmental effects of the project and identifies a Preferred Alternative. After making its decision, and no sooner than 30 days after this FEIS is available to the public and notice of its availability has been published in the Federal Register, FHWA will issue a Record of Decision (ROD) selecting an alternative, providing the rationale for the decision and stating the mitigation measures that will be incorporated into the project.

This Executive Summary provides general information regarding the proposed project and alternatives and highlights key information from chapters of this FEIS to show how the alternatives compare to each other in their benefits and effects to the natural and human environment.

ES.1.1 Project Background

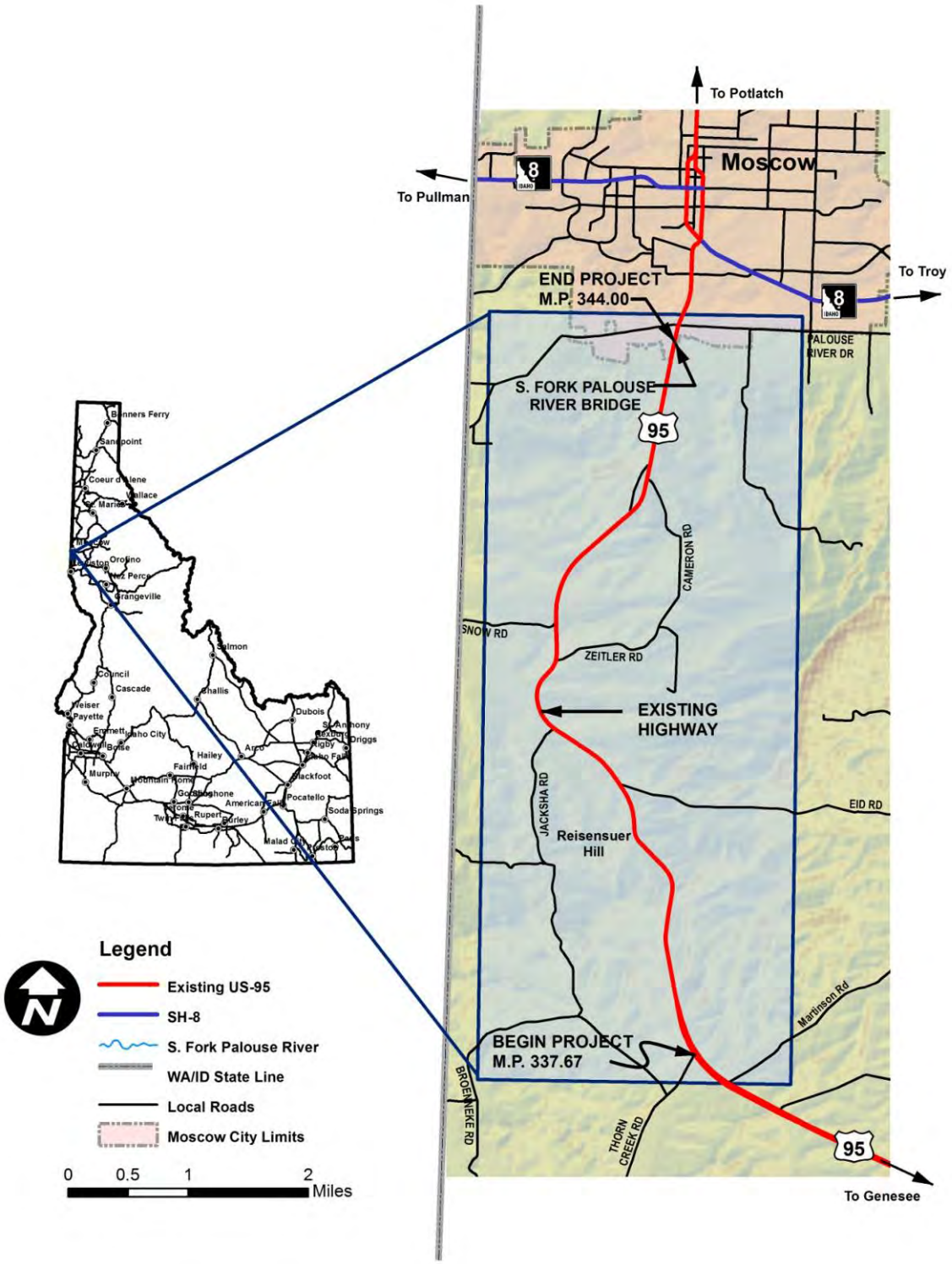
In 1999, FHWA and ITD began developing an Environmental Assessment (EA) for a 20.4-mile improvement of US-95 from the Top of Lewiston Hill to Moscow. The project intent was to widen the existing highway in the southern 15.8 miles of the project and construct 4.6 miles of a new four-lane highway in the northern section. Eleven alternatives for the northern-most section of the corridor were narrowed to two. Alternative 6 would have widened along the existing highway and Alternative 10A would have constructed a four-lane highway on new alignment near the base of Paradise Ridge.

Alternative 10A was selected by ITD and FHWA and a Finding of No Significant Impact (FONSI) was issued in May 2002. The project was litigated by the Paradise Ridge Defense Coalition, Inc. in 2003. The US District Court for the District of Idaho (Court) in the judgment for Civil Case number 03-0156-S-BLW decided that the EA and issuance of a FONSI were not appropriate. The court found that an Environmental Impact Statement (EIS) would be required for the northern 4.6-mile segment between Thorncreek Road and Moscow to allow full consideration of the impacts by the public and agencies. The southern 15.8 miles was allowed to proceed and construction was completed in October 2007. A Notice of Intent to prepare an EIS for the northern section was published in the Federal Register on November 13, 2003. See the DEIS, Chapter 1, Introduction for additional information.

ES.1.2 Project Location

The project is located along US-95 south of the City of Moscow in Latah County, Idaho. The project begins at Thorncreek Road (MP 337.67) and continues north for 6.34 miles, ending at the South Fork Palouse River Bridge (MP 344.00). This section of US-95 travels primarily through the rolling hills and agricultural fields of the Palouse Region. See Exhibit 1. Project Location Map.

Exhibit 1. Project Location Map



ES.2 Purpose and Need

The purpose of this project is to improve public safety and increase highway capacity on US-95 south of Moscow between Thorncreek Road (MP 337.67) and the South Fork Palouse River

Bridge (MP 344.00). Within the project limits, US-95 does not meet current American Association of State Highway and Transportation Officials (AASHTO) Standards. Additional concerns include High Accident Locations (HALs) and insufficient highway capacity. The primary deficiencies of the roadway are described in detail in the DEIS, Chapter 1, Introduction and Section 3.10, Transportation.

ES.2.1 Need

US-95 is part of the National Highway System (NHS), a North America Free Trade Agreement (NAFTA) route spanning the United States from Canada to Mexico. Within Idaho, US-95 is classified as a principal arterial, providing the only continuous north-south highway connection between the Idaho Panhandle and the rest of the State. US-95 is a major route for commercial, residential, agricultural, and recreational travel through Idaho.

Public Safety

Horizontal Curves and Vertical Grades. The existing highway has several horizontal curves and vertical grades that do not meet AASHTO standards. The ascending grade on the south side of Reisenauer Hill is an approximately 4.3 percent and the descending grade on the north side of Reisenauer Hill is approximately 6 percent. The crash statistics for the highway between 2003 and 2012 show that this section of US-95 averages 25.3 crashes per year and is expected to reach 27.4 crashes per year by 2017. Reisenauer Hill is the most prominent topographical feature the alignments go over, with the steepest grades and some of the highest crash rates. As ADTs in this segment continue to increase and the two-lane highway reaches capacity, these conditions are expected to worsen.

Crashes. High Accident Locations (HALs) are based on the past three years of crash data and change annually. Three HALs are located in the project limits based on the DEIS crash data. These segments have the highest crash rates in ITD District 2 and ranked in the top 13 of Idaho State HALs. See Table 1. High Accident Locations (HALs).

Table 1. High Accident Locations (HALs)

Milepost Location on US-95	Idaho HAL Ranking
337.67 - 338.17	6
338.67 - 339.62	13
340.62 - 341.12	4

Source: (ITD 2012a)

Based on the updated crash data, two of District 2's top five official HALs are located within this section of highway. Statewide, the two HALs are ranked as numbers 17 and 34. See Table 2. Updated High Accident Locations (HALs).

Table 2. Updated High Accident Locations (HALs)

Milepost Location on US-95	Idaho HAL Ranking
337.67 to 339.62	34
340.62 to 341.62	17

Source: (ITD 2013)

Access. There are 66 approaches[1] from the highway to either public, commercial and field locations in this 6.34-mile segment of US-95. The many approaches do not meet the ITD Access Control Policy due to spacing, sight distance, and the width and grade of the approaches, which contribute to intersection-related conflicts. Since the DEIS was published, access for the proposed US-95 Action Alternatives was designated as Expressway Access Control which would limit approaches to only ITD designated locations as determined during the design and right-of-way process. This access control would not be in effect until payment is made to adjacent property owners for the restriction of existing access rights. See Sections 2.4.2, 3.10 and 4.10 and Table 76. General Responses to Issues under Access for more detail.

The north end of the project is the most densely populated area with the highest number of intersection related crashes. The southern end of the project has closely spaced approaches with curves, which have also resulted in a high number of intersection related crashes.

Surface Conditions. In addition to the primary deficiencies, this section of US-95 has a substandard rating for the pavement surface. Both the surface roughness and the amount of cracking fall below the minimum standard indices used to determine acceptable pavement performance.

Highway Capacity

Capacity and Operating Conditions. The AASHTO standards and ITD Policy for capacity for a rural highway is a Level of Service (LOS) B. This segment of US-95 currently has a volume of 5,364 ADT and is operating at a LOS C. This is considered a high-density traffic flow with restricted movements and delays for short periods. By the 2037 design year, the volume for this segment of US-95 is projected to be 8524 ADT and would be operating at LOS D. This is at-capacity and would result in delays due to congestion.

Roadway Width. The existing roadway consists of two undivided 12-foot travel lanes with two-foot shoulders. The clear zone and shoulder width, which are important elements for safety,

[1] IDAPA 39.03.42 definition of approach is a connection between the outside edge of the shoulder or curb line and the abutting property at the highway right-of-way line, intended to provide access to and from said highway and the abutting property. An approach may include a driveway, alley, street road or highway.

vary throughout the corridor and do not meet the AASHTO standards[2]. This two-lane segment of US-95 is also a bottleneck for the four-lane highway at the northern and southern ends of the project.

ES.3 Proposed Solution

The proposed solution or "action" would be constructed to meet the AASHTO standards. The existing two-lane undivided highway from Thorncreek Road to the South Fork Palouse River Bridge would be replaced with a four-lane divided highway with a 34-foot median through the majority of the corridor. A four-lane highway with center turn lane, curb, gutter and sidewalk would be constructed at the northern end of the project. See Exhibit 2. Typical Section: Four-Lane Divided Highway and Exhibit 3. Typical Section: Four-lane Highway with Center Turn Lane and Curb, Gutter and Sidewalk. The elements of the proposed action are described in detail in Chapter 2, Alternatives.

Exhibit 2. Typical Section: Four-Lane Divided Highway

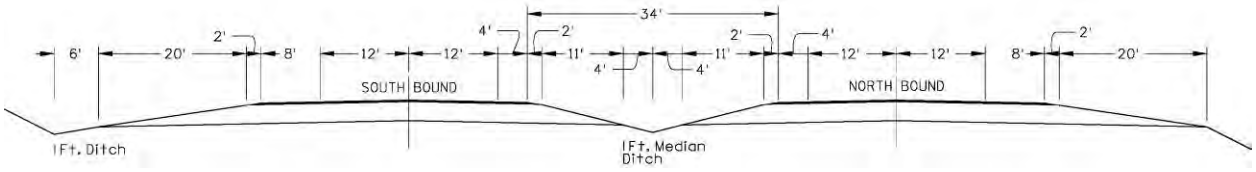
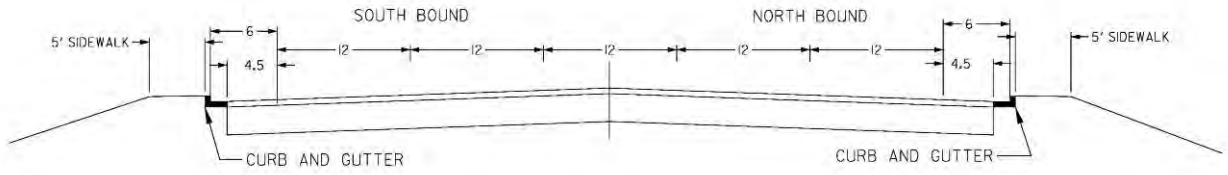


Exhibit 3. Typical Section: Four-lane Highway with Center Turn Lane and Curb, Gutter and Sidewalk



The highway would be designed to meet the capacity and safety needs for the 2037 design year. It would be designed to include the following:

- *Lanes* – Four travel lanes with a 34-foot median, four-foot wide shoulders on the left and eight-foot paved shoulder on the right, would transition to four travel lanes with a continuous 12-foot center turn lane and six-foot shoulders, curb, gutter and a five-foot

[2] AASHTO standards are outlined in the Roadside Design Guide 2011 (4th Edition).

wide sidewalk. This would match the existing US-95 cross sections at the South Fork Palouse River Bridge and south of Thorncreek Road.

- *Speed Limit* – The posted speed would be 65 mph for the four-lane divided highway section. It would be 35 mph or 45 mph (depending on the alternative) in the section with a four-lane highway with center turn lane, curb, gutter, and sidewalk at the north end of the project where there are no curves. It is possible that the speed limit could be increased in the future; however, this would require a speed limit study to be conducted.
- *Turn Lanes* – Right and left turn lanes would be constructed at all county road intersections.
- *Stormwater* – In the rural sections, a minimum one-foot deep, V-shaped ditch would be located on either side of the roadway in cut sections and in the center median. The urban section would have curbs and gutters and would be designed to meet the requirements of the National Pollutant Discharge Elimination System (NPDES) and treated in accordance with applicable state and federal laws. A Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented to comply with the Construction General Permit (CGP). Stormwater in this area would be collected and managed with temporary and permanent Best Management Practices (BMPs) such as grassy swales and check-dams, in order to meet the requirements of the CGP and Total Maximum Daily Loads (TMDLs).
- *Access* – The existing US-95 is currently designated as Statewide Access Control. The proposed US-95 Action Alternatives were designated as Expressway Access Control through an Idaho Transportation Board action on January 15 &16, 2014. Expressway Access Control is a segment of a highway designated by the Idaho Transportation Board for use as a through highway, with partially controlled access, accessible only at locations specified by ITD, and characterized by medians, limited at-grade intersections, and high speeds. An existing segment of state highway may only be designated as an expressway if payment is made to adjacent property owners for the restriction of existing access rights [Idaho Administrative Procedures Act (IDAPA) 39.03.42].

  While the District Engineer has the authority to approve a decrease in the spacing requirements for other access types, Expressway Access Control does not have spacing requirements; therefore, access is allowed only at locations designated by ITD which will be determined in collaboration with the landowner during the right-of-way process. This is stated in the IDAPA 39.03.42 Section 400.03, which is reflected in ITD's 0606 Form for Current Access Purchase Determination. A blank sample of the ITD 0606 Form that would be used is provided in the Safety Analysis Technical Report. ITD will be required to comply with their access policy and will have the regulatory power to limit access.

ITD would buy access rights from adjacent properties during right-of-way acquisition, and access will be recorded in the deeds. Existing approaches[3] would be allowed to remain at locations where construction of joint access is not economically justified. See Section 2.4.2, 4.10, Transportation Effects and Table 76. General Responses to Issues under Access for additional detail. The board agenda, minutes, and a blank sample of the ITD 0606 Form that would be used is provided in the Safety Analysis Technical Report.

- *Clear Zone* – The clear zone would be a minimum of 30 feet for the four-lane divided highway.
- *Vertical Grade* – The roadway would have a maximum of a five percent vertical grade.
- *Horizontal Curve* – The rural section would have a 2910-foot minimum radius at a 5.4 percent super elevation, which is adequate for a design speed of 70 mph. The urban section will have a 1760-foot minimum radius at a three percent super elevation, which is adequate for design speeds of 35 mph and 45 mph.
- *Stopping Sight Distance*[4]– the stopping sight distance would be a minimum of 730 feet, which is adequate for a design speed of 70 mph on level grades. This will increase or decrease depending on the grade.
- *LOS* – The LOS for the 2037 design year would be LOS A for both the rural section with the four-lane divided highway and the urban four-lane with center turn lane, curb, gutter and sidewalk.
- *Bicycle/Pedestrian Facilities* – The shoulders on the outside lanes of the highway in the rural and urban sections would be shared use lanes but would not be specifically marked for bicycle use. The five-lane section would have sidewalk for pedestrian use.

Adding a lane in each direction to create a four-lane section would alleviate the bottleneck caused by the existing two-lane segment, improving the capacity and traffic flow safely. Improving the grades, curves, stopping sight distance, access control and clear zone widths to meet AASHTO standards would improve the safety and capacity of the highway. The proposed actions would reduce the projected crash rate for this segment of US-95 by more than 50 percent.

ES.4 Alternatives Screening

NEPA requires that a range of reasonable alternatives, including a No Action Alternative, be evaluated in detail. The Council on Environmental Quality (CEQ) defines "reasonable

[3] IDAPA 39.03.42 definition of approach is a connection between the outside edge of the shoulder or curb line and the abutting property at the highway right-of-way line, intended to provide access to and from said highway and the abutting property. An approach may include a driveway, alley, street road or highway.

[4] Stopping sight distance on a roadway should be sufficiently long to enable a vehicle traveling at or near the design speed to stop before reaching a stationary object in its path. The design speed for the proposed alternative is 70 mph for rural sections.

alternatives" as those that are practicable or feasible from a technical and economic standpoint and those that achieve the project's purpose and need. The alternatives were developed in consideration of natural and social effects, engineering design considerations, and input from the public, agencies, and local elected officials. The alternatives were developed, evaluated and screened in two phases as summarized below. See the FEIS, Chapter 2, Alternatives and the Screening of Alternatives Technical Report for details.

Level One. The goal of the Level One screening process was to collect preliminary information and to evaluate broad transportation concepts. Early in the project scoping, traffic and safety data for the corridor was collected and analyzed. This information helped to identify the roadway deficiencies and to identify the project purpose and need.

In 2004 ITD conducted community interviews and implemented an extensive public involvement process to introduce the proposed project and obtain community input. See Chapter 7, Public Involvement and Agency Coordination. Key public and agency involvement opportunities during the DEIS development have included the following:

- An Interdisciplinary Team (IDT) was formed that included ITD, FHWA, US Army Corps of Engineers (USACE), Environmental Protection Agency (EPA), US Fish and Wildlife Service (USFWS), Idaho Department of Fish and Game (IDFG) and Idaho Department of Environmental Quality (IDEQ). They reviewed and provided comment on project information, technical reports and collaborated with FHWA and ITD on specific topics as needed.
- Monthly newsletters and monthly breakfast meetings featuring technical experts provided an opportunity for the public to learn about the project and to ask questions.
- A project website with project information and technical reports was used to inform and update the public during project development.
- Two-day public meetings and open houses were held in 2004, 2005 and 2006.
- A two-day public workshop for community members to review the range of alternatives and provide input was held in 2005.
- Postcard invitations were sent to all residents of Moscow and Genesee for key public involvement opportunities.
- A mobile project kiosk with project information and updates was placed at several public facilities in the area between November 2004 and June 2005.

Transportation concepts that were evaluated included the No Action, Action Alternative, Transportation System Management (TSM), Transportation Demand Management (TDM) and Mass Transit. The TSM, TDM and Mass Transit alternatives were not forwarded for further consideration because of the rural nature and low population density of the project area and

because they would not address the safety deficiencies of the existing roadway and therefore would not address the purpose and need. The No Action and Action Alternatives were forwarded for further consideration.

Design elements to address the roadway deficiencies were evaluated and incorporated into typical sections for the Action Alternatives. See ES.3, Proposed Solution and Section 1.4, Purpose and Need.

Level Two. The goal of the Level Two screening process was to identify a range of alternatives and to screen them. The No Action and 10 Action Alternatives were identified and categorized into the western, central and eastern corridors. These alternatives can be seen in Exhibit 4. Initial Alternatives.

One alternative from each corridor was forwarded for detailed analysis to give a range of alignment alternatives. Seven alternatives were eliminated from further consideration during the Level Two screening process. These alternatives were not advanced due to high adverse effects on the natural or built environment, less benefit compared to the other alternatives, or because they were similar to other alternatives that were advanced for detailed analysis. See Chapter 2, Alternatives, for detail regarding the screening process and rationale.

The alternatives' benefits and effects to the natural and human environments were evaluated and organized into a comparative spreadsheet. Criteria used to screen the alternatives are listed below.

- Air Quality
- Archaeological Sites
- Design Standards
- Displacements
- Environmental Justice
- Estimated Construction Cost
- Hazardous Materials
- Historic Sites
- Noise
- Plant Species and Communities of Concern
- Prime Farmland
- Regulatory Floodways and Floodplains
- Right-of-Way Acres
- Safety
- Socio-Economic
- State Sensitive Species
- Threatened and Endangered Species
- Ungulates
- Visual Analysis
- Water Quality
- Weather
- Wetlands and Tributaries

ES.5 DEIS Alternatives

NEPA laws and regulations require that a No Action Alternative be considered in the range of reasonable alternatives. In addition to the No Action Alternative, three Action Alternatives were carried forward for detailed analysis in the DEIS, the W-4, C-3 and E-2 alternatives. See Exhibit 4. Initial Alternatives. All three Action Alternatives and the No Action Alternative were evaluated with the design elements as described in ES.3, Proposed Solution.

Exhibit 4. Initial Alternatives

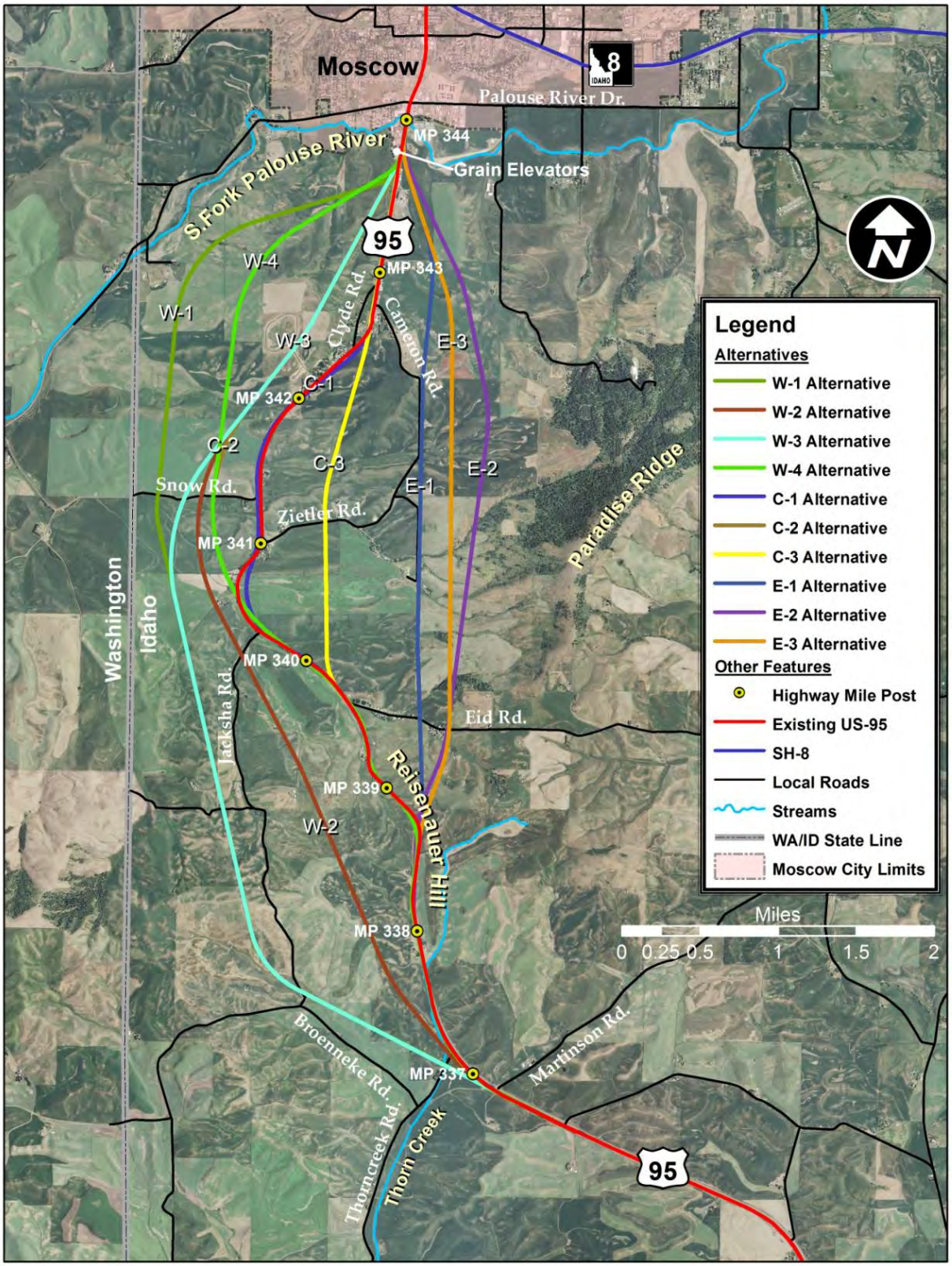
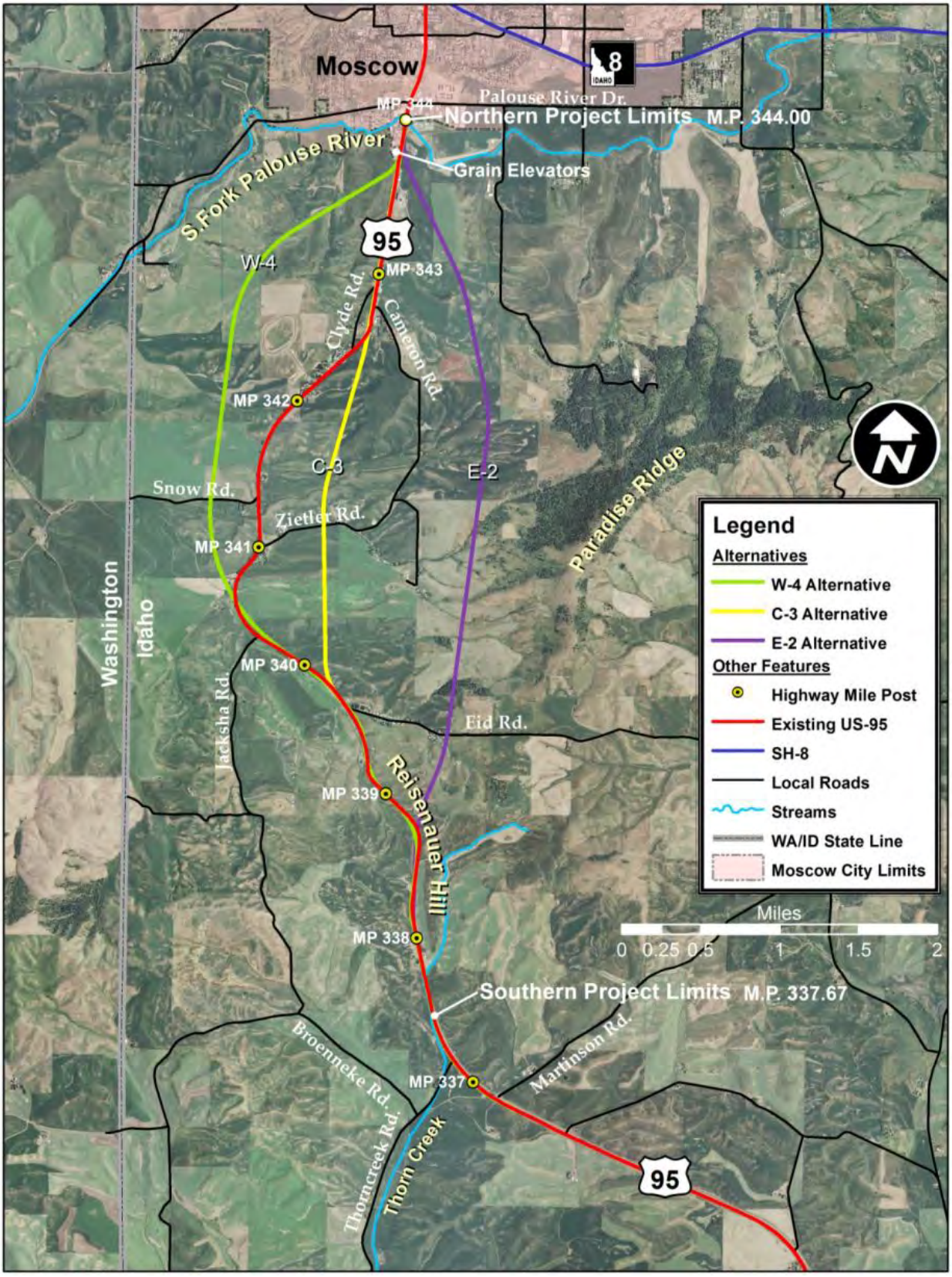


Exhibit 5. DEIS Alternatives



No Action

The No Action Alternative would not involve any major improvements to US-95 but would include short-term minor restoration activities to the existing 6.34-mile segment.

Improvements would include minor safety, paving and maintenance activities for the continued operation of the existing roadway. It would not involve improving or widening this segment of US-95 to meet AASHTO standards. The No Action Alternative provides a baseline for comparison of the other alternatives.

W-4 Alternative

The W-4 Alternative that was evaluated in the DEIS was shifted during the FEIS development to avoid a historic farmstead that is also a Section 4(f) Resource. This alternative is called the Modified W-4 Alternative and is evaluated in detail in this FEIS.

Modified W-4

This alternative would be approximately 6.65 miles long. It would begin at Thorncreek Road and would closely follow existing US-95 between Thorncreek and Jacksha roads. The alignment would then shift west of existing US-95. Modified W-4 would cross Snow Road, stay west of Clyde Hill and connect back into the existing US-95 near the grain elevators south of Moscow. Existing US-95 between Jacksha Road and the grain elevators (2.91 miles) may be turned over to the North Latah Highway District (NLHD). See Exhibits 13 –18. Alignment Alternatives in Chapter 2, Alternatives for more detail.

C-3

This alternative would be approximately 5.94 miles long. It would begin at Thorncreek Road and would closely follow existing US-95 to just north of Eid Road. The alignment would then shift to the east of existing US-95 and cross Zeitler Road. C-3 would connect back into existing US-95 just south of Cameron Road, near Johnson Trucking. From Johnson Trucking north to the South Fork of Palouse River Bridge this alternative would utilize the existing alignment. Existing US-95 north of Eid Road to south of Cameron Road (2.71 miles) may be turned over to the NLHD. See Exhibits 13 –18. Alignment Alternatives in Chapter 2, Alternatives for more detail.

E-2 (Preferred Alternative)

This alternative would be approximately 5.85 miles long. It would begin at Thorncreek Road and would closely follow existing US-95 to the top of Reisenauer Hill where it would then shift to the east of existing US-95. The alignment would connect back into existing US-95 near the grain elevators south of Moscow. Existing US-95 from the top of Reisenauer Hill to the grain elevators (5.43 miles) may be turned over to the NLHD. This is FHWA and ITD's Preferred Alternative. See Exhibits 13 –18. Alignment Alternatives in Chapter 2, Alternatives for more detail.

ES.6 Alternative Benefits and Effects

Each of the four alternatives was analyzed for a full spectrum of environmental effects in compliance with 23 CFR 771 and FHWA Technical Advisory (TA) 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents. Information for the W-4 Alternative that was evaluated in the DEIS was replaced with information for the Modified W-4 Alternative. The major differences between alternatives are summarized in Table 3. Summary of Alternatives' Benefits and Effects. See Chapter 4, Environmental Consequences and the respective technical reports for details regarding the resources and effects.

Table 3. Summary of Alternatives' Benefits and Effects

Resources	Alternatives			
	No Action	Modified W-4	C-3	E-2
Predicted Crashes (total crashes 2017 through 2036)	642.5	244.9	260.2	213.9
Access Points	66	36	47	22
Residential Impacts	0	3	2	7
Potential Residential Impacts	0	2	5	6
Business Impacts	0	0	0	0
Potential Business Impacts	0	0	8*	0
Right-of-Way new/existing/total (acres)	0	206/45/251	154/55/ 209	207/22/229
Prime Farmland (acres)	0	49.7	25.1	50.8
Cultural/Section 4(f) Resources	0/0	0/0	0/0	0/0
Floodplains (acres)	0	1.6	1.8	0
Wetlands (acres)	0	1.85	0.99	3.61
Tributaries –# Crossings/Linear feet of affected channel	0	10/3,592	5/7,808	5/2,592
Hazardous Material Sites	0	4	13 (1 potential cleanup)	4
Noise Impacted Receptors **	9	No noise impacted receptors would remain after construction	No noise impacted receptors would remain after construction	1 noise impacted receptor would remain after construction
Construction /Total Cost (mil $)***	0	52/62	43/58	46/55

*The Green Acre RV stalls are counted as one business.
** Noise impacted receptors that would be removed due to right-of-way acquisition are not included in these numbers.
*** The estimated cost includes excavation, rock ballast, plant mix, structures, traffic control and illumination. It excludes engineering, construction engineering, mitigation and right-of-way.

No Action

The No Action Alternative would include minor safety and maintenance projects; however, the narrow roadway, curves and steep grades would still not meet AASHTO standards. With the projected increase in traffic volumes the crash rate for the No Action Alternative is estimated to have 27.4 crashes in 2017. From 2017 through 2036 the No Action Alternative is estimated to have 642.5 crashes, with 256.5 of those crashes being fatal or injury crashes. The No Action would have a LOS D by 2037 and would be substantially more congested than existing conditions.

The No Action Alternative would not require right-of-way acquisition. It would have some environmental effects such as uncollected and untreated stormwater, the highest noise impacts, and air quality degradation, and would have some minor environmental effects but it would have the least overall effect. The No Action Alternative would have the worst safety and LOS compared to any of the Action Alternatives. It would not meet the project purpose and need.

Modified W-4

The Modified W-4 Alternative is aligned west of existing US-95 similar to the W-4 Alternative but a short section of the centerline was shifted approximately 120 ft east to avoid a historic farmstead. Modified W-4 would impact fewer residences than the E-2 Alternative and would have similar effects to hazardous materials compared to E-2. The Modified W-4 would have the greatest effects to farmlands, use the greatest total right-of-way and affect the greatest number of tributary crossings. It would not affect potential habitat for long-eared myotis and northern alligator lizard, and pygmy nuthatch habitat associated with ponderosa pine stands near Paradise Ridge. It would also have the greatest total fatal and injury crashes. Of the alternatives, the Modified W-4 Alternative would be the least consistent with the land use plans.

C-3

The C-3 Alternative would run closest to the current highway and would utilize much of the existing US-95 alignment. It is predicted to have the highest total number of crashes of the Action Alternatives. The primary differences between the C-3 Alternative and the other Action Alternatives are that C-3 would require the least amount of new right-of-way compared to Modified W-4 and E-2 but would have the greatest potential business impacts and affect the greatest number of hazardous material sites. It would have the greatest amount of floodplain impact and approximately three times the length of tributary channel compared to the E-2 Alternative. It would avoid the pine stands that are habitat for Pygmy nuthatch and potential habitat for northern alligator lizard and long-eared myotis, similarly to the Modified W-4. C-3 would also have the least wetland effects. It would have the fewest impacts to residenceswould be compatible with land use plans.

E-2 (Preferred Alternative)

E-2 is aligned east of existing US-95. The primary advantages of E-2 are that it is aligned through flatter topography, has the fewest number of approaches, and has the greatest safety improvement. E-2 would affect the least amount of tributary channel and would avoid floodplains. Similarly to the other alternatives, it would avoid cultural and Section 4(f) resources. The primary disadvantage of E-2 over the other alternatives is that it would be located in close proximity to Paradise Ridge which supports a Ponderosa pine stand and various shrubs that provide the best ungulate habitat in the project area (Sawyer 2010). E-2 would affect pine stands that are pygmy nuthatch habitat and potential habitat for long-eared myotis and northern alligator lizard. It would also have the highest noise impacts to residences of the action alternatives. The E-2 Alternative would have the greatest indirect effects to Palouse remnants, planned and ongoing Palouse restoration projects and a key conservation area for Spalding's catchfly recovery primarily due to potential weed establishment and spread outside the right-of-way compared to the other alternatives. E-2 would be compatible with land use plans.

ES.7 Preferred Alternative

The evaluation of effects during the screening process, detailed analyses presented in this FEIS, and the public and agency comments on the DEIS resulted in the lead agencies, FHWA and ITD, identifying the E-2 Alternative as the Preferred Alternative. The E-2 Alternative is identified as the Preferred Alternative for the following reasons:

- It would have the greatest safety improvement.
- It would have the fewest access points and at-grade county intersections.
- It would have the least effect to streams.
- It would avoid potential business impacts and floodplains.
- It would have the shortest five-lane typical section and overall shortest length.
- It best meets the project purpose and need.

ES.8 Topics of Concern or Controversy

During the public and agency involvement processes, it became evident through repeated written and verbal comments, that there were specific concerns and controversy related to the following topics:

- Effects of the E-2 Alternative on Paradise Ridge including effects to the Palouse remnants, weed dispersal, potential wildlife effects and mitigation for wildlife impacts
- Effects of weather on safety within corridors
- Visual impacts to Moscow residents

In response to public and agency concerns, FHWA and ITD prepared detailed studies and shared the findings through the extensive public involvement process and considered them in decision-making.

Wildlife Habitat and Wildlife Movement. IDFG, EPA and USFWS prefer the C-3 Alternative to the E-2 Alternative. This is primarily due to the E-2 Alternative's direct and indirect effects to wildlife, weed dispersal to Palouse remnants, and the effects to wildlife habitat and movement due to its proximity to Paradise Ridge and other native habitats. The primary reasons that C-3 was not identified as the Preferred Alternative were because it would have the greatest predicted total crashes with the greatest number of at-grade access points compared to the other Action Alternatives.

There has been disagreement between IDFG and ITD regarding appropriate mitigation for the direct and indirect effects due to the conversion of land that may be utilized by wildlife (privately-owned farmland and Conservation Reserve Program (CRP) land), which would be converted to highway right-of-way and therefore represents a loss in wildlife habitat. IDFG had prepared a wildlife assessment (IDFG 2006), which provided mitigation recommendations for the loss of habitat in the project area and the direct and indirect effects of alternatives on wildlife and wildlife habitat. Three other wildlife studies were also prepared which concluded wildlife species, including ungulates, may utilize the project area, which offers low to moderate quality habitat for wildlife. The eastern corridor has more suitable habitat than the central or western corridors. More suitable habitat is available north, south and east of the project area or concentrated in the gullies (Ruediger 2007).

While high quality habitat for ungulates is not present in the project area, the E-2 Alternative would have a greater effect on wildlife habitat than either Modified W-4 or C-3. Mitigation for direct habitat loss, indirect habitat loss, or loss of connectivity for moose or elk was reviewed in the report titled *Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow* (Sawyer 2010). The report findings recommended future monitoring of wildlife crashes to determine whether future mitigation might be warranted in sections of E-2 but did not recommend other mitigations for ungulates.

Through a series of correspondence and meetings between 2007 and the FEIS publication, ITD and IDFG evaluated the impacts and discussed several mitigation options including, additional monitoring, wildlife crossing structures, ratio-based funding for Palouse Ecoregion restoration, and conservation projects, and additional funding to replace the roadway footprint. Many other specific wildlife mitigations were also suggested. Prior to the FEIS publication, IDFG agreed with ITD and FHWA's position to not provide monetary compensatory mitigation funds to IDFG. ITD and IDFG agreed upon other mitigation measures that compensate for identified

impacts, and will be incorporated into the project design to minimize harm to wildlife and habitat. ITD and IDFG will collaborate on the details of the mitigation measures before final design. See the FEIS, Section 4.8 Vegetation, Fish and Wildlife and Chapter 9, Environmental Commitments.

Weather Conditions. During the public meetings held from 2004 to 2006, weather as it pertained to safety was a major topic of concern. The public expressed concern that the topographic differences between the alternative corridors (west, central and east), could result in differing climatic conditions that could influence safety.

To respond to this concern, a detailed weather analysis was developed that evaluated the differences in the weather in three corridors. The study measured wind speed, precipitation, snow, and road ice over the five month winter period. This five-month data set was used to rank the larger 30+ year data set from the University of Idaho (UI) Plant Sciences Farm (PSF). The Weather Analysis was revised after the DEIS was published. The revised report is titled *Weather Analysis and Climate Study for US Highway 95, Thorncreek Road to Moscow, Four Proposed Alternatives, No-Build, W-4, C-3 and E-2 (Qualls 2014)* and provides additional year-round data and additional data on snow accumulation. It also offers clarification of weather principles. The studies concluded that while there may be minor variations in climatic conditions in the corridors, they were not substantial enough to warrant additional safety factors in the safety analysis.

The Modified W-4 and C-3 alternatives would descend at a steeper grade near Reisenauer Hill where snow accumulation is greater compared to the E-2 Alternative, which descends at a flatter grade further north where snow accumulation is less. However, the improvement of the lane widths, clear zones, steep grades and curves are more influential factors to safety and all the action alternatives would be designed to AASHTO standards and would be safe. Therefore, weather was considered when developing the design elements but will not be a major factor for comparing the alternatives. See Chapter 3, Affected Environment and Chapter 4, Environmental Consequences. Detail may be found in the Revised Weather Analysis (Qualls 2014).

Visual. There are differing opinions regarding the visual effects of the W-4 and E-2 alternatives and what may be an adverse impact to one person may not be to another. The Citizens for a Safe Highway 95, claiming to represent people collectively owning 80 percent of the land along E-2, were in favor of the E-2 Alternative due to the "spectacular view" of the Palouse and of the City of Moscow for travelers. They believe that the beauty of Paradise Ridge could transform the highway into a gateway for Moscow, and that E-2 could promote and preserve the Palouse landscape through scenic highway status. The group opposed alternative W-4, stating that it

would disrupt westerly views and promote farmland conversion disrupting the agricultural setting (HDR 2005a).

The Paradise Ridge Defense Coalition, who opposed the E-2 Alternative, felt the expansion of the roadway should follow the existing route as much as possible in order to minimize the ecological footprint of road. In the view of those opposed to an E-2 Alternative, the ridge should remain untouched because it provides both aesthetic and environmental value as one of the last remaining natural prairie in the area (HDR 2006).

ES.9 Planned Projects

There are no other major transportation projects planned for the area. The Ring Road project is a planned loop around the City of Moscow that would permit through traffic on both US-95 and SH-8 to travel around the perimeter of the City; however, it is in a conceptual phase and no detailed alignment has been proposed, nor is project funding identified. The Ring Road Concept has been developed to a point that an alignment is proposed based on topographic conditions, expected design standards, and anticipated use. The alignment has been included in the adopted City of Moscow Comprehensive Plan, the Latah County Comprehensive Plan, and the North Latah County Highway District Transportation System Plan. While a final detailed alignment has not been developed, in the area of the interaction with the US-95 realignment project, the Ring Road alignment options are fairly limited and all of the action alternatives for the US-95 Thorncreek Road to Moscow project would be designed to accommodate future construction of the Ring Road Concept. See Chapter 6, Indirect and Cumulative Effects and Community Profile - Induced Development Technical Reports for more information regarding planned developments.

ES.10 Permits and Approvals

If an Action Alternative is selected, then permits and approvals will be required and may include; Section 404 permits, NPDES Construction General Permit, Notice of Demolition, Section 401 Water Quality Certification, Stream Channel Alteration Permit and Floodplain permits. See Table 5. Permits and Approvals in Chapter 1, Introduction. Additional requirements for each alternative are listed in Chapter 9, Environmental Commitments.

ES.11 Next Steps

FHWA and ITD have published a 30-day notice of availability in the Federal Register for this FEIS. FHWA will then issue a ROD selecting an Action Alternative, a combination of the Action Alternatives, or the No Action Alternative. The ROD will also provide the rationale for the decision and identify mitigation measures. See Exhibit 6. Typical EIS Process Diagram.

Exhibit 6. Typical EIS Process Diagram



In addition to the public involvement described in Chapter 7, Public Involvement and Agency Coordination, information regarding this project will be posted and updated on www.itd.idaho.gov/Projects/D2/. Select "US-95 Thorncreek to Moscow Phase I".

1 INTRODUCTION

1.1 Background

In 1999, FHWA and ITD began developing an Environmental Assessment (EA) for a 20.4-mile improvement of US-95 from the Top of Lewiston Hill to Moscow. The project intent was to widen the existing highway in the southern 15.8 miles of the project and construct 4.6 miles of a new four-lane highway in the northern section. Eleven alternatives for the northern-most section of the corridor were narrowed to two. Alternative 6 would have widened along the existing highway and Alternative 10A would have constructed a four-lane highway on new alignment near the base of Paradise Ridge.

Alternative 10A was selected by ITD and FHWA and a FONSI was issued in May 2002. The project was litigated by the Paradise Ridge Defense Coalition, Inc. in 2003. The US District Court for the District of Idaho (Court) in the judgment for Civil Case number 03-0156-S-BLW decided that the EA and issuance of a Finding FONSI were not appropriate. The court found that an EIS would be required for the northern 4.6-mile segment between Thorncreek Road and Moscow to allow full consideration of the impacts by the public and agencies. The southern 15.8 miles was allowed to proceed and construction was completed in October 2007.

The Court decision for US-95 Lewiston Hill to Moscow was based on the finding that FHWA regulations give examples of actions that normally require an EIS, which includes a highway project of four or more lanes in a new location. Since the EA didn't discuss its unique circumstances, an EIS should have been prepared.

In an Idaho Department Fish and Game (IDFG) Draft Terrestrial Wildlife Impact report which was an appendix to the EA, IDFG characterized the diversity of plant and wildlife communities in Palouse remnants, xplained its rarity and stated that the new highway would disturb habitat and result in fragmentation and disruption of wildlife movement. IDFG also stated that it is difficult to predict the extent of this long-term impact but it is expected to be significant. Mitigation was recommended should the 10A alternative be selected. ITD did not follow the IDFG mitigation but pursued an alternative mitigation site. The Court ruled that because ITD chose not to follow the IDFG analysis and mitigation recommendations without relying on its own experts or explaining in the EA the unique or atypical circumstances that warranted proceeding in a different direction, that the EA raised substantial concerns regarding significant impact which was not resolved. Therefore, a FONSI was not appropriate and an EIS should be prepared.

An EIS is being prepared in response to the Court decision and in compliance with FHWA regulations. A Notice of Intent (NOI) to prepare an EIS for the section of US-95 between

Thorncreek Road and Moscow was published in the Federal Register on November 13, 2003. An extensive public involvement process has been completed and will continue to be implemented to identify and continue to address public and agency concerns. The public scoping process resulted in the identification and screening of a range of reasonable alternatives. See Chapter 2, Alternatives and Chapter 7, Public Involvement and Agency Coordination.

During the development of the DEIS and FEIS several technical reports were prepared to fully evaluate vegetation and wildlife resources and alternative effects. Experts in the respective fields conducted these reports. The technical reports are summarized in Chapter 3, Affected Environment and Chapter 4, Environmental Consequences and are listed below:

General Wildlife Assessment, Thorncreek Road to Moscow (December 2006). This report evaluates the impacts of the project to Idaho Species of Greatest Conservation Need (SGCN) species found in the project vicinity. It also discusses potential mitigation measures (IDFG 2006).

Biological Evaluation on the Potential Impacts of Corridor Alternatives from Thorncreek Road to Moscow on Large Ungulates (December 2005). This report evaluates the potential effects of alternatives through different corridors (west, central and east) on the habitat and survival of white-tailed deer (*Odocoileus virginianus*), elk (*Cervus elaphus*), and moose (*Alces alces*) in the project area (Melquist 2005a).

Biological Evaluation on the Long-eared Myotis and Pygmy Nuthatch (December 2005). This report describes the potential effects of the proposed project on the long-eared myotis (*Myotis evotis*) and pygmy nuthatch (*Sitta pygmaea*) which were classified as SGCN by the IDFG (Melquist 2005b).

Final Review of Wildlife Mitigation for the Thorncreek Road to Moscow Highway Development Project (US-95) (September 2007). This report reviews and summarizes the information in the General Wildlife Assessment (IDFG 2006) and Biological Evaluation on Potential Impacts of Corridor Alternatives (Melquist 2005a). It evaluates the effects of the alternatives to deer, elk and moose and makes mitigation recommendations (Ruediger 2007).

Assessment of Potential Big Game Effects and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow (December 2010). This report summarizes the various wildlife reports prepared for the project and provides ITD with an independent assessment of the project's effects to potential big game and also discusses mitigation (Sawyer 2010).

Biological Assessment, Thorncreek Road to Moscow Highway Construction Project (December 2007). This study describes the project effects to federally listed and proposed species and designated critical habitat (ITD 2007a). This report was reviewed in November 2011 and USFWS provided concurrence that the findings are still valid in 2007, 2011 and 2012.

A Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between the Uniontown Cutoff and Moscow (January, 2007). This report describes the potential weeds in the study area. It also describes the potential for the proposed project to spread weeds and discusses mitigation for the potential effects (Lass and Prather 2007).

Biological Evaluation of Plant Species and Communities of Conservation Concern in the US Highway 95 Thorncreek Road to Moscow Project Area (December 2005). This report discusses the potential occurrence and extent of rare plants and communities in the project area. It analyzes the potential effects for the proposed project on plant species of conservation concern and remnant native plant communities that potentially provide habitat for these species (Lichthardt 2005).

A Memo Documenting Resurvey for Spalding's catchfly in the Project Area, was prepared after the DEIS publication. This report documents the resurvey of the project area during the summer of 2014. No new plants were found (Lichthardt 2014).

Where ITD and FHWA had concerns or saw a lack of clarity with the consultants' or IDFG's assessments of effects to ungulates, other wildlife or proposed mitigation, recognized experts conducted additional studies to evaluate the effect and mitigation recommendations. The evaluations and findings were documented in the reports by Ruediger in 2007 and Sawyer in 2010. These reports were provided to IDFG. The report prepared by Sawyer was sent to IDFG in 2010 with a letter explaining the findings.

The Sawyer report found that the Melquist and Ruediger reports were consistent regarding general habitat quality and the relative alternatives' effects to habitat. It provided new information that was available since the previous reports were prepared which also supported the conclusions of the reports. That information was presented in the DEIS.

Both Ruediger and Melquist stated in their reports that the alternatives would not have population level effects to ungulates and that no mitigation was required for population level effects. Both offered optional recommendations that included wildlife crossing, fencing, habitat preservation and other measures that could benefit individuals and mitigate for animal vehicle collisions; however, these were not required, nor are they likely to be effective without land use control in the surrounding properties.

Melquist acknowledged that there may be impacts to individual ungulates through increased road kills, possible habitat avoidance, and increased risks to motorists and offers seven recommended actions that would benefit deer, elk, moose, and other wildlife should transportation corridors be constructed. These recommendations include one or two possible wildlife crossings near draws, fencing associated with the crossings, habitat preservation near those crossings and other measures. However, he further states that not implementing a recommended action would not jeopardize populations of any of the species.

Animal/vehicle collisions (AVCs) and associated risks to motorists were considered in the AASHTO Safety Analyses and are mitigated for in the proposed alternatives' design. Clearing vegetation from the clear zone (highway right-of-way), widening the roadway and improving the sight distance are all mitigating factors that are expected to significantly reduce the AVCs. On US-20 between MP 369 and 375, similar improvements reduced the AVC by 85 percent (ITD 2012a). To further mitigate for the possible AVCs, if the E-2 Alternative is selected; ITD will monitor AVCs near Paradise Ridge in the identified ungulate crossing areas. The monitoring of AVCs will use existing ITD programs including the ITD/IDFG Road Kill & Wildlife Salvage Database, which is a road kill reporting and mapping tool. ITD also evaluates highway accident data annually and identifies high accident locations (HALs) based on the previous three years of crash data. These locations are investigated to determine contributing factors to accidents, including AVCs, and solutions are proposed and programmed. Should it be identified as a problem, ITD will take action to address AVCs and will collaborate with IDFG as needed to identify effective solutions.

Ruediger did not recommend stand-alone large game crossings nor did he recommend replacement of lost wildlife habitat. However, in recognition of the resource agencies' desire for mitigation, he made three optional recommendations, all of which were considered and included in the FEIS Chapter 9, Environmental Commitments. These were 1) to provide a wildlife/vehicle crossing at county road underpasses of US-95 where wildlife use is expected and where wildlife are welcome on private lands (deer, elk and moose), 2) to provide oversized culverts to allow for small terrestrial movement and 3) to replace water sources on the east side of the highway should water sources be impacted. Fencing will also be provided to prevent animals from getting onto the highway in areas where collisions are most likely and to funnel wildlife into crossings.

In the summer of 2012, ITD and IDFG began discussions regarding a MOU to address mitigation for vegetation, fish and wildlife effects. However, after further meetings with IDFG it was decided that an MOU would not be necessary and instead mitigation measures are included in the FEIS Chapter 9, Environmental Commitments. This includes additional detail about wildlife

mitigation including crossings for large and small terrestrial movement and fencing. In addition ITD and IDFG have committed to working together before final design to determine the details of the mitigation and to help ensure the success of the wildlife mitigation measures.

See Appendix 1, Key Agency Correspondence and Forms. See Section 4.8, Vegetation, Fish and Wildlife Effects and Section 4.9, Threatened and Endangered Species Effects and the respective technical reports for additional detail. The measures that FHWA and ITD plan to adopt to compensate for the identified resource effects are listed in Chapter 9, Environmental Commitments.

1.2 Setting

The project area is immediately south of the City of Moscow, Idaho. Moscow is the most populous city in the Palouse Region and is the Latah County seat. Moscow's primary employers are the University of Idaho in Moscow and Washington State University, which is located five miles to the west in Pullman, Washington. Moscow also serves as the agricultural and commercial hub for the Palouse Region. The study area is primarily agricultural land with scattered rural residences. The northern section of the project is within the southern boundary of the City of Moscow and is more urbanized with commercial and higher density residential development.

1.3 Project Location

The US-95 Thorncreek Road to Moscow Project is located south of Moscow, in Latah County, Idaho. The logical termini established for the project begins at Thorncreek Road (MP 337.67) and runs north to the South Fork Palouse River Bridge (MP 344.00). See Exhibit 7. Project Location.

1.4 Purpose

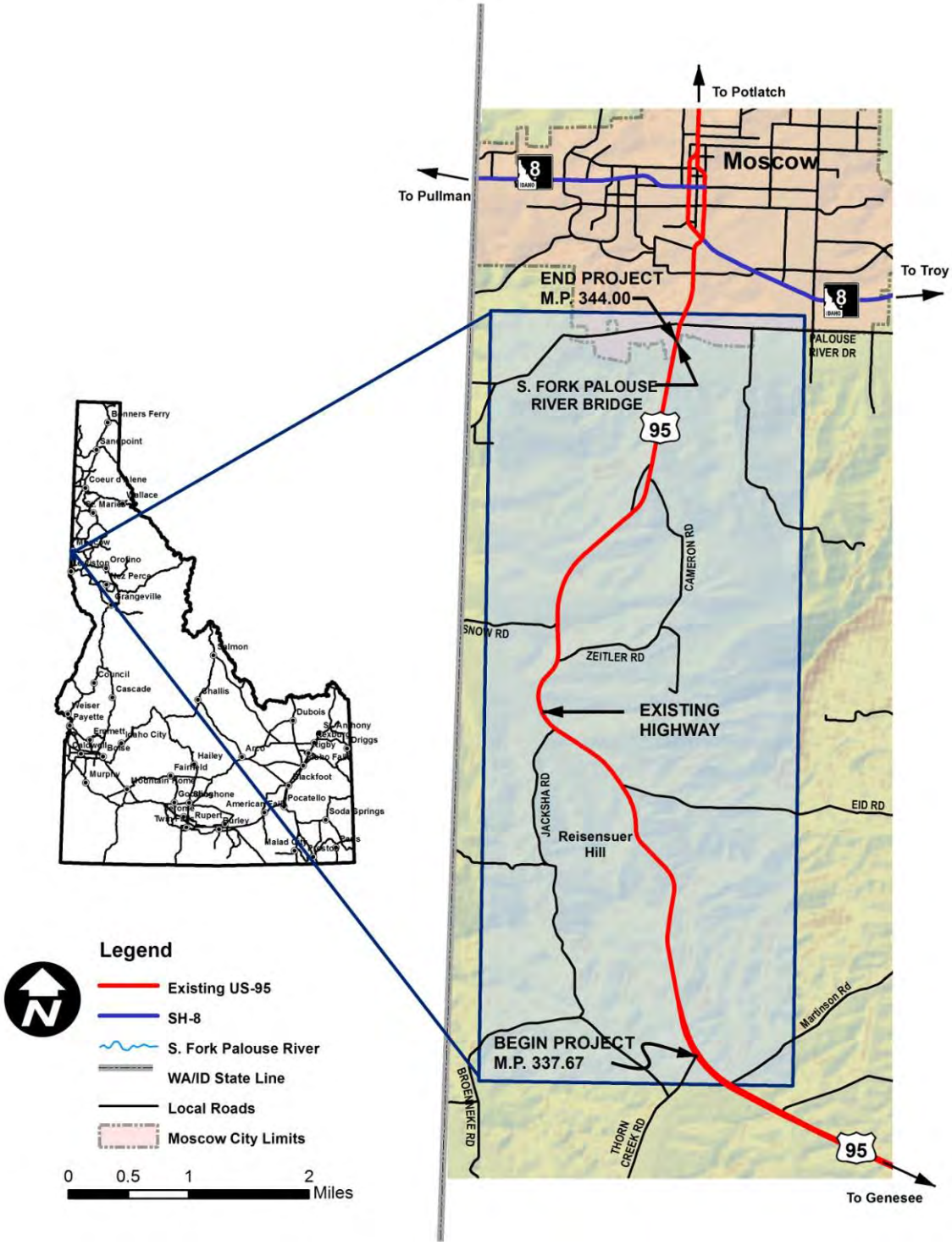
The purpose of this project is to improve public safety and increase highway capacity on US-95 south of Moscow between Thorncreek Road (MP 337.67) and the South Fork Palouse River Bridge (MP 344.00).

1.5 Need

US-95 is part of the National Highway System (NHS) and is a North America Free Trade Agreement (NAFTA) route spanning the United States from Canada to Mexico. Within Idaho, US-95 is classified as a principal arterial, providing the only continuous north-south highway connection between the Idaho Panhandle and the rest of the state. It supports multiple local uses, including primary access to agricultural, residential, commercial and industrial land located

directly adjacent to the highway. Within the City of Moscow, US-95 connects with SH-8, which is a major east-west highway. The US-95 Thorncreek to Moscow project is included in the approved Idaho Transportation Investment Program (ITIP) (ITD 2011a).

Exhibit 7. Project Location



1.5.1 Public Safety

Horizontal Curves and Vertical Grades

The existing highway has several horizontal curves and vertical grades that do not meet AASHTO standards. The crash statistics for the highway between January 2003 and December 2012 show that this section of US-95 averages 25.3 crashes per year and is projected to reach 27.4 crashes per year in 2017, the anticipated year of construction completion. Over half of the crashes in the corridor occurred between MP 338 and MP 342 and approximately half of those were associated with a horizontal curve in the road. The curves on this section of highway contribute to approximately nine accidents per year. Approximately 60 percent of the crashes in this section of highway occur during inclement weather conditions, such as snow, rain, hail, fog or ice (ITD 2013).

Access

Access for this section of US-95 is currently Statewide Access Control. There are 66 approaches[5] (public, commercial and field approaches) in this 6.34-mile segment. The many approaches do not meet the ITD Access Control Policy due to spacing, sight distance, width and grade of approaches, which contributes to intersection related conflicts. From 2003 to 2012, 26 crashes were directly associated with private approaches or intersections (ITD 2013).

The north end of the project is the most densely populated area with the highest number of intersection related crashes. The southern end of the project is primarily rural residences and farms with closely spaced approaches and curves that have also resulted in a high number of intersection related crashes.

Surface Conditions

In addition to the primary deficiencies, this section of US-95 has a substandard rating for the pavement surface. Both the surface roughness and the amount of cracking fall below the minimum standard indices used to determine acceptable pavement performance.

1.5.2 Highway Capacity

Capacity and Operations

This segment of US-95 has an ADT of 5364 and operates at a Level of Service (LOS) C based on 2010 data. This is considered a high-density traffic flow with restricted movements and delays for short periods. The volume for this segment of US-95 is projected to be 8,524 ADT by

[5] IDAPA 39.03.42 definition of approach is a connection between the outside edge of the shoulder or curb line and the abutting property at the highway right-of-way line, intended to provide access to and from said highway and the abutting property. An approach may include a driveway, alley, street road or highway.

2037, based on a two percent annual growth rate. It would operate at a LOS D in the 2037 design year. See Table 4. Existing and Projected ADTs.

Table 4. Existing and Projected ADTs

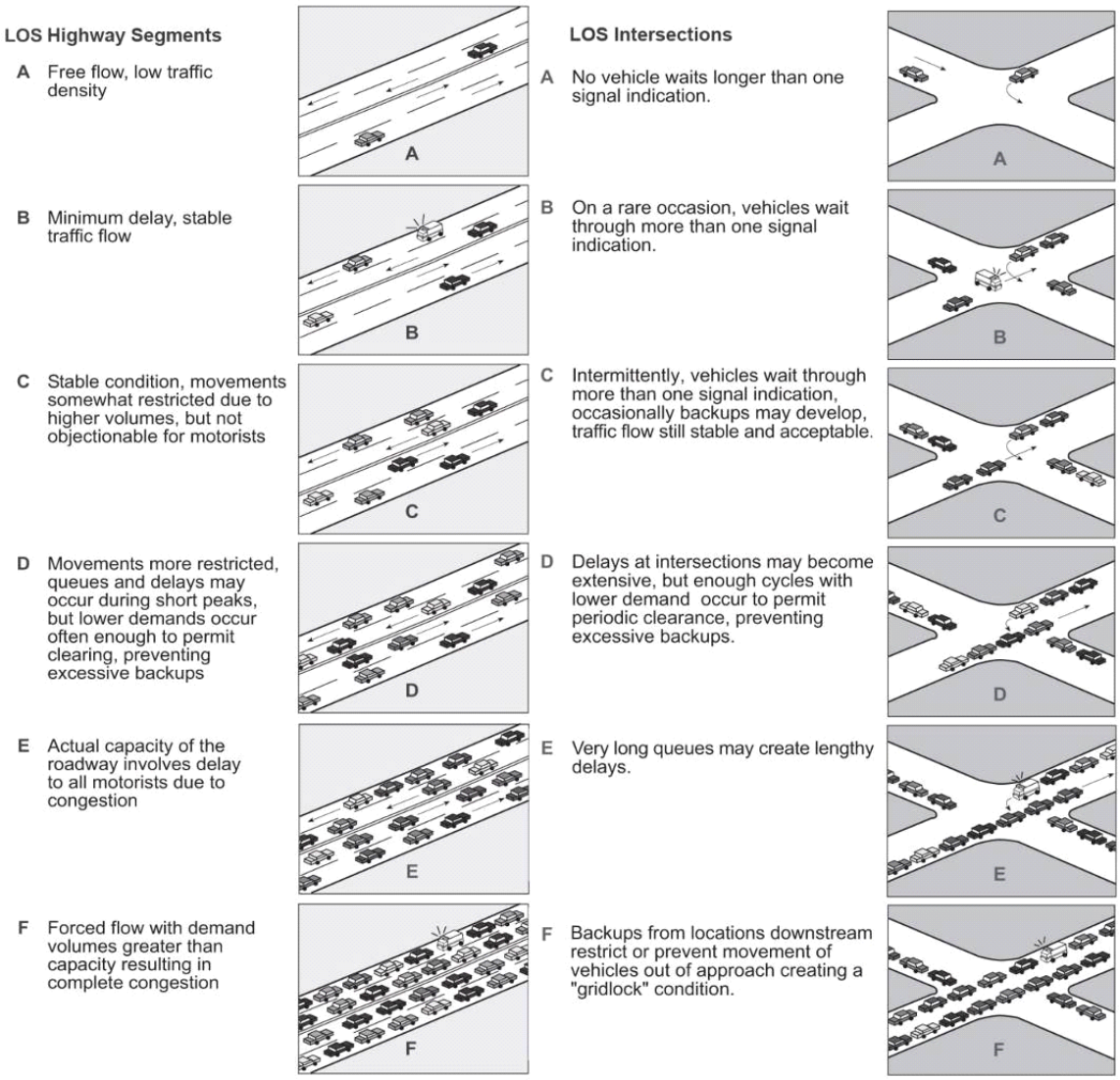
US-95 Segment (MP)	Existing 2010 (ADT)	Design Year 2037 (ADT)
337.2-337.7	4,900	7,809
337.7-339.6	4,900	7,821
339.6-342.9	5,300	8,437
342.9-344.1	6,500	10,221
Overall ADT - 337.2-344.1	5,364	8,524

This is at-capacity and would result in delays due to congestion. The traffic consists of approximately 5.7 percent heavy truck traffic and 94.3 percent passenger vehicles. The AASHTO standard for capacity for a rural highway is LOS B. See Exhibit 8. Level of Services (LOS).

Roadway Width

The existing roadway consists of two 12-foot undivided travel lanes with two-foot shoulders. The clear zone and shoulder width, which are important elements for safety, vary throughout the corridor and do not meet AASHTO standards. This two-lane segment of US-95 is a bottleneck for the four-lane highway at the northern and southern ends of the project. It experiences approximately one head-on collision per year. The proposed solutions to alleviate these deficiencies are described in Chapter 2, Alternatives, Section 2.4.2, Design Elements and Typical Section for Action Alternatives.

Exhibit 8. Level of Services (LOS)



Note: Information in this diagram illustrates concepts from the Highway Capacity Manual 2000

1.6 Public Concerns

1.6.1 Scoping Process

The following is a summary of the primary public concerns expressed during the scoping process, the public involvement effort and through public comment. See Chapter 7, Public Involvement and Agency Coordination for additional detail.

- Safety concerns due to curves that do not meet current AASHTO standards.
- Safety concerns due to weather
- Safety concerns due to steep approaches and grades
- Potential indirect effects to Paradise Ridge

- Public concern regarding wildlife habitat and wildlife movement effects (especially concerning weeds, pygmy nuthatch, giant Palouse earthworm, Palouse remnants, and ungulates)
- IDFG concern regarding direct and indirect effects to a host of species listed as Species of Conservation Concern (SCC) and Species of Greatest Conservation Need (SGCN) and mitigation for impacts.
- Construction timing
- Potential effects to wetlands, floodplains and tributaries
- Visual effects of the E-2 Alternative

1.6.2 DEIS Comment Period

The following is a summary of the primary public concerns expressed during the DEIS comment period. See Chapter 7, Public Involvement and Agency Coordination for detail regarding the public involvement activities. See Chapter 10, Comments and Responses for all of the public and agency comments and responses to those comments.

- Concern regarding the validity of the Weather and Safety Analyses
- Safety concerns regarding the weather conditions for each alternative.
- Significance of the difference in length between alternatives
- Potential spread of weeds to Paradise Ridge and Palouse remnants
- Development pressure on Paradise Ridge
- Concern regarding maintenance of the new and old roadways
- Concern regarding the use of multiple wildlife experts
- Concern regarding discrepancies in numbers of displacements
- Concern that access control would not be enforced
- Concern regarding impacts to farmland
- Consideration of the safety deficiencies that will remain on the existing US-95 loop
- Continuing concern regarding safety due to steep approaches, grades and curves.
- Potential indirect effects to Paradise Ridge
- Public concern regarding wildlife habitat and wildlife movement effects (especially concerning weeds, pygmy nuthatch, giant Palouse earthworm, Palouse remnants, and ungulates)
- IDFG concern regarding direct and indirect effects to a host of species listed as SCC and SGCN and mitigation for impacts.
- Construction timing
- Visual effects of the E-2 Alternative, especially views from Moscow
- Mitigation for effects to wildlife habitat, residences, wetland and other resources.

- Short term improvements that don't require road realignment (speed limit, pull outs, widening lanes)

1.7 Permits and Approvals

Table 5. Permits and Approvals list the permits and approvals that may be required to construct any of the Action Alternatives. Other required measures are listed by alternative in Chapter 9, Environmental Commitments.

Table 5. Permits and Approvals

Agency	Permits or Approvals
FHWA	Issue Record of Decision
USACE	Jurisdictional determination and Section 404 Permit
EPA	NPDES Construction General Permit
EPA	Notice of Demolition
IDEQ	401 Water Quality Certification
IDWR	Stream Channel Alteration Permit
FEMA, Moscow and/or Latah County	Floodplain No Rise Certification; Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR)

1.8 Document Organization

This FEIS document is organized as follows:

FEIS Body

Chapter 1, Introduction provides a general background of the project and explains the purpose and need for the project. It describes the proposed action including design elements and lists required permits and approvals should an Action Alternative be selected.

Chapter 2, Alternatives describes how a range of reasonable alternatives was developed and screened. It describes the alternatives that were evaluated for detailed analysis and how the Preferred Alternative was identified.

Chapter 3, Affected Environment describes the regulatory framework and policies for resource protection and the methods used to evaluate the existing conditions and effects to resources.

Chapter 4, Environmental Consequences describes the benefits and effects of the No Action, Modified W-4, C-3 and E-2 alternatives on the natural and human environment.

Chapter 5, Section 4(f) Evaluation describes the Section 4(f) resources that would be affected by the alternatives. It describes avoidance alternatives and the Modified W-4 Alternative that was developed after the DEIS hearing.

Chapter 6, Indirect and Cumulative Effects describes the indirect effects from the project that could occur at a time and place separate from the project. It also discusses the cumulative effects of the project in addition to past and reasonably foreseeable future projects, even if they are unrelated to the proposed project.

Chapter 7, Public Involvement and Agency Coordination describes the public involvement, agency consultations, and tribal coordination during the development of the DEIS. It also provides updated public involvement activities that have occurred since the DEIS publication.

Chapter 8, Construction Phasing and Funding describes how the proposed action would be funded and constructed.

Chapter 9, Environmental Commitments lists the measures implemented to avoid, minimize and compensate for the adverse effects of the alternatives on the natural and human environment. Mitigation was revised since the DEIS was published.

Chapter 10, DEIS Comments and Responses presents the public and agency comments on the DEIS and Alternatives and provides responses to the submitted comments.

Appendices

Appendix 1, Key Agency Correspondence and Forms includes important letters and concurrence documents from agencies. Additional agency coordination documentation has been added since the DEIS was published.

Appendix 2, List of Preparers and Reviewers –lists the primary authors and reviewers of the DEIS, FEIS and technical reports as well as their experience and qualifications.

Appendix 3, List of Agencies, Organizations and Persons Receiving the DEIS and FEIS -lists the agencies, organizations and persons to whom a copy of the DEIS was sent. It also lists locations where the DEIS and FEIS may be viewed.

Appendix 4, Species of Greatest Conservation Need, Conservation Ranking Descriptions- describes the ranks and classifications for the Species of Greatest Conservation Need.

Appendix 5, Uniform Relocation Act Summary provides a summary of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, which governs the right-of-way acquisition process.

Appendix 6, Horizontal and Vertical Alignment Calculations provides data regarding the horizontal alignment and vertical grade for the conceptual level alternatives.

Technical Reports

Technical reports were prepared and updated as necessary. The technical reports are referenced under Chapter 3, under the Methodology sections for each respective discipline and are also listed after the Table of Contents. These technical reports are available electronically on the disc distributed with the respective DEIS and FEIS documents. Public viewing locations where hard copies of the FEIS and the technical reports may be viewed are listed in Appendix 3, List of Agencies, Organizations and Persons Receiving the FEIS.

The following reports were prepared after the DEIS publication or included with the FEIS publication to provide additional information and to evaluate the existing conditions and alternative effects. These reports are included as technical reports to the FEIS.

- *Memo Documenting Resurvey for Spalding's Catchfly along US-95 Thorncreek to Moscow Project Area* (Lichthardt 2014)
- *Memo: Effects Analysis of the US Highway 95-Thorncreek Road to Moscow Project for Plant Species and Communities of Conservation Concern* (Lichthardt 2008)
- *Hydrogeologic Analysis of Alternative Alignments of Highway 95 from Thorncreek to Moscow* (Ralston 2014)
- *US-95 Thorncreek Road to Moscow; AASHTO Highway Safety Manual Analysis on Alternatives Carried Forward* (ITD 2013)
- *Addendum 1 US-95 Thorncreek Road to Moscow AASHTO Highway Safety Manual Analysis on Alternatives Carried Forward. (ITD 2015b)*
- *US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward (ITD 2014a)*
- *Addendum 1 US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward. (ITD 2014b)*
- *Weather Analysis and Climate Study for US Highway 95, Thorncreek Road to Moscow, Four Proposed Alternatives, No-Build, W-4, C-3 And E-2* (Qualls 2014)
- *Hydraulic Study for Affected Floodplains on Alternatives Carried Forward (ITD 2014c)*
- *Analysis of Noise Environment and Impacts (Bionomics 2012)*
- *Addendum to the Analysis of Noise Environment and Impacts (ITD 2015a)*

- *Addendum A to the Cultural Resource Reports to evaluate the Modified W-4 Alternative (ITD 2015c)*

Errata sheets, summaries of changes or supplemental analyses were prepared for the technical reports as needed, to describe changes to the W-4 Alternative (Modified W-4), to provide corrections and to update information since the DEIS was published.

2 ALTERNATIVES

This chapter describes the process used to identify and screen a range of reasonable alternatives. It presents the rationale used to eliminate alternatives from further consideration or to forward them for detailed analysis in the DEIS and FEIS. It also compares the alternatives evaluated in the DEIS and FEIS.

2.1 Regulatory Framework and Policies

The development and screening of alternatives under the NEPA are governed by the following:

- 40 CFR 1500-1508 - NEPA regulation of Council on Environmental Quality (CEQ)
- 40 CFR 230-Section 404(b)(1) - Guidelines for Specification of Disposal Sites for Dredged or Fill Material
- 33 CFR 325 Appendix B - NEPA Implementation Procedures for the Regulatory Program
- 23 CFR 771 - FHWA Environmental Impact and Related Procedures
- FHWA TA 6640.8A - NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents
- FHWA Environmental Guidebook

23 CFR 771.125(a) states the FEIS shall identify the Preferred Alternative and evaluate all reasonable alternatives considered.

2.2 Methodology

ITD and FHWA began the scoping process following the publication of the NOI on November 13, 2003. Public and agency input were used to develop a range of reasonable alternatives for consideration. The alternatives were developed and screened in two phases:

Level One involved identifying the logical termini, project purpose and need and evaluating broad transportation concepts and elements.

Level Two involved identifying a range of reasonable alternatives, analyzing alternative benefits and effects and completing a screening process. As a result of the screening process, four alternatives were forwarded for detailed analysis in the DEIS:

- No Action Alternative
- W-4 Alternative
- C-3 Alternative
- E-2 Alternative (Preferred Alternative)

The No Action Alternative is described in Section 2.4, Level One Screening and the three Action Alternatives (W-4, C-3 and E-2) are described in Section 2.5, Level Two Screening.

Public involvement has been a key factor for the identification and screening of the alternatives since the beginning of the project. Key public involvement activities and scoping efforts are summarized in Chapter 7, Public Involvement and Agency Coordination and the Screening of Alternatives Technical Report.

After the DEIS publication the W-4 Alternative was modified to avoid impacts to a historic farmstead/Section 4(f) resource. A detailed analysis of the Modified W-4 Alternative is presented in this FEIS.

2.3 Logical Termini

The logical termini are the rational end points for a transportation improvement project and its resulting environmental effects [23 CFR 771.111(f)].

The US-95 Thorncreek Road to Moscow project is located along US-95 south of Moscow, in Latah County, Idaho. The logical termini established for the project begins at Thorncreek Road (MP 337.67) and runs north to the South Fork Palouse River Bridge (MP 344.00). See Exhibit 1. Project Location Map. These logical termini will not restrict consideration of other reasonably foreseeable improvements.

The logical termini for the project were determined by the US District Court of Idaho's (Court) decision on the Environmental Assessment (EA) for the US-95 Lewiston Hill to Moscow project. The Court in the judgment for Civil Case number 03-0156-S-BLW found that an EIS would be required for the northern 4.6-mile segment between Thorncreek Road and Moscow to allow full consideration of the impacts by the public and agencies. The southern 15.8 miles was allowed to proceed and construction was completed in October 2007. This southernmost project began at the Top of Lewiston Hill (MP 323.2) and ended at Thorncreek Road (MP 337.2).

The US-95 Thorncreek Road to Moscow project abuts the northern terminus of the constructed four-lane divided highway between the Top of Lewiston Hill and Thorncreek Road (MP 337.67) and the southern terminus of the South Fork Palouse River Bridge project (MP 344.00).

The segment of US-95 between Thorncreek Road and Moscow generates approximately 14 percent more traffic than US-95 between Genesee and Thorncreek Road. The change in traffic reflects the transition from agricultural to a higher density of commercial and residential use.

There were four times the number of injury and fatality crashes between Thorncreek Road and Moscow when compared to US-95 between the top of Lewiston Hill and Thorncreek Road (MP 323.36 to 337.67) between October 2007 and December 2011. During this time, thirty-one injury and fatality crashes occurred on the newly constructed four-lane divided highway between the top of Lewiston Hill and Thorncreek Road. This is 2.17 injuries and fatalities per centerline mile. During the same time period, 68 injury and fatality crashes have occurred between Thorncreek Road and Moscow (MP 337.67 to 344.00). This is 10.7 injuries and fatalities per centerline mile.

The Thorncreek Road to Moscow segment represents a change in topography from rolling hills to more mountainous terrain, which contributes to the deficiencies in curvature and grade through the corridor.

2.4 Level One Screening

2.4.1 Transportation Concepts

The following transportation concepts were considered among the range of reasonable alternatives. The level one screening process is displayed in Table 6. Level One Screening Results and described below.

Table 6. Level One Screening Results

Alternative	Screening Results	Summary of Rationale for Eliminating or Forwarding Alternatives
No Action	Forwarded for detailed analysis	Required by NEPA to be evaluated with other alternatives. Minimal environmental effect.
TSM, TDM and Mass Transit	Eliminated	Rural area with less than 200,000 population density. Would not address safety deficiencies and would not meet purpose and need.
Action Alternatives-follow existing alignment or with short realignments	Forwarded for detailed analysis	Alternatives would be designed to meet purpose and need.
Action Alternatives on a new location	Forwarded for detailed analysis	Alternatives would be designed to meet purpose and need.

No Action Alternative. The No Action Alternative would include short-term minor restoration activities (safety and maintenance improvements, etc.) that maintain operation of the existing roadway. It would include projects such as turn lanes at public road approaches within the existing right-of-way, pavement overlays and seal coats to maintain the continuing operation of the existing roadway. The No Action Alternative serves as a baseline and is required by FHWA NEPA regulations to be considered in the DEIS. Therefore, this alternative was forwarded for further consideration.

Transportation System Management (TSM), Transportation Demand Management (TDM) and Mass Transit Alternatives. These alternatives could improve the efficiency of the existing system. TSM may include ridesharing, high-occupancy vehicle (HOV) lanes on existing roadways, and traffic signal timing optimization. TDM may provide travelers choices such as work location, route, time, and mode.

TSM and mass transit are required to be considered for major projects proposed in urbanized areas with populations over 200,000 (FHWA 1987). The area surrounding the US-95 Thorncreek Road to Moscow project is rural and does not meet the 200,000 population threshold even when considering the surrounding towns and cities.

The existing corridor between Thorncreek Road and Moscow does not have existing signalization that could be optimized. HOV lanes would not be effective as the primary issues related to the facility are related to safety and additional HOV lanes would not address the existing safety deficiencies. There are existing vanpool and rideshare systems in place in Moscow and Lewiston. Mass transit in the form of shuttle buses have been implemented in the corridor in the past, but were discontinued due to low ridership and lack of funding. Mass transit would also not address the safety deficiencies within the project limits. Reconstruction of the existing facility under the TSM, TDM and Mass Transit Alternatives would not address safety deficiencies and would not meet the project purpose and need; therefore, these alternatives were eliminated from further consideration.

Action Alternatives. These include both improvements along the existing highway and alternatives in new locations that meet the project purpose and need. An alternative that follows the existing highway and alternatives with short sections of realignment were developed and forwarded for detailed analysis.

Action Alternatives were developed at a concept level for the US-95 Genesee to Moscow segment which was later divided into separate projects. Criteria used to evaluate the concept level alternatives included; safety/crash rates, highway capacity, level of service, public and agency input, functional classification of the roadway, and access control. Design elements that addressed the project purpose and need and met AASHTO standards were identified and incorporated into the typical section. See 2.5.1 Develop Alignment Alternatives for a description of the initial alternatives.

2.4.2 Design Elements and Typical Section for Action Alternatives

The proposed action would replace the existing two-lane undivided highway from Thorncreek Road to the South Fork Palouse River Bridge with a four-lane divided highway with a 34-foot

median through the majority of the alignment. See Exhibit 9. Typical Section: Four-Lane Divided Highway. It would transition to a four-lane highway with a center turn lane, curb, gutter and sidewalk in the urban area just south of Moscow. See Exhibit 10. Typical Section: Four-lane Highway with Center Turn Lane, Curb, Gutter, and Sidewalk. These typical sections would match the existing roadways at the northern and southern termini of the proposed project. Safety and maintaining consistency through the corridor were primary factors in determining the design standard and the typical section. The highway would be designed to meet capacity and safety needs for the 2037 design year and would meet AASHTO standards[6]. The primary design elements of the proposed action are summarized below.

Exhibit 9. Typical Section: Four-Lane Divided Highway

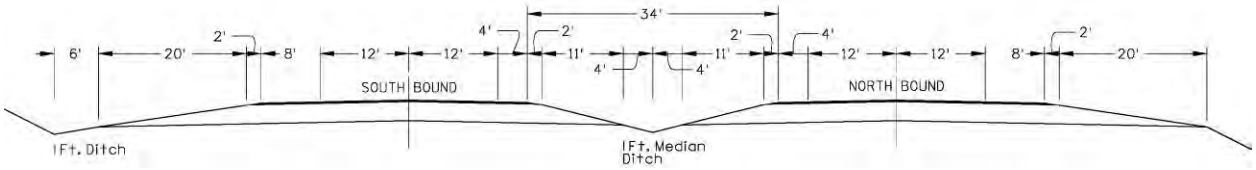
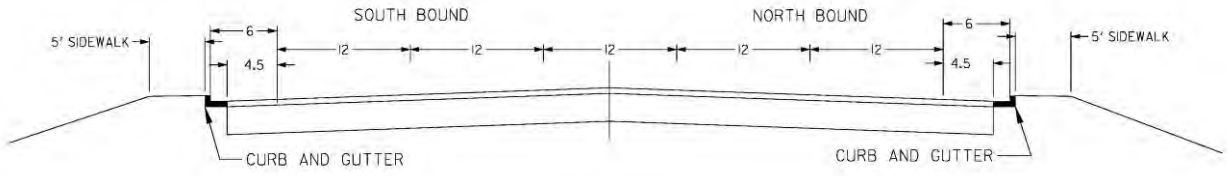


Exhibit 10. Typical Section: Four-lane Highway with Center Turn Lane, Curb, Gutter, and Sidewalk



- *Speed Limit* – The posted speed would be 65 mph for the four-lane divided highway section. It would transition to 35 mph or 45 mph, depending on the alternative, in the section with a four-lane highway with center turn lane, curb, gutter, and sidewalk at the north end of the project. It is possible that the speed limit could be increased in the future; however, this would require a speed limit study be conducted.
- *Lanes* – Four travel lanes with a 34-foot median, four-foot wide shoulders on the left and eight-foot paved shoulder on the right, would transition to four travel lanes with a continuous 12-foot center turn lane and six-foot shoulders, curb, gutter and a five-foot wide sidewalk. This would match the existing US-95 cross sections at the South Fork Palouse River Bridge and south of Thorncreek Road.

[6] FHWA has adopted AASHTO; *A Policy on Geometric Design of Highways and Streets,* which outlines standards for new/reconstruction projects on the National Highway System.

- *Turn lanes* – Left and right turn lanes would be constructed at all county road intersections except where overpass structures are specified.
- *Stormwater* – In the rural sections, a minimum one-foot deep, V-shaped ditch would be located on either side of the roadway in cut sections and in the center median. The urban section would have curbs and gutters and stormwater would be collected and treated in accordance with applicable laws and regulations and designed to meet NPDES stormwater requirements. A SWPPP would be developed that would identify temporary and permanent BMPs such as grassy swales and check-dams to comply with the CGP and TMDLs.
- *Access* – Access control would be based on the facility type, functional classification, highway safety, vehicle operations, and preservation of highway utilities, zoning, and route consistency. The access control for this segment of US-95 is currently Statewide Access Control. The proposed US-95 Action Alternatives were designated as Expressway Access Control through an Idaho Transportation Board action on January 15 & 16, 2014. (See the Safety Analysis Technical Report for the agenda and board minutes). Expressway Access Control is a segment of a highway designated by the Idaho Transportation Board for use as a through highway, with partially controlled access, accessible only at locations specified by ITD, and characterized by medians, limited at-grade intersections, and high speeds. An existing segment of state highway may only be designated as an expressway if payment is made to adjacent property owners for the restriction of existing access rights [IDAPA 39.03.42].
- *Clear zone* – The clear zone would be a minimum of 30 feet for the four-lane divided highway
- *Vertical grade* – The roadway would have a maximum of a five percent vertical grade.
- *Horizontal curve* – The Rural Section would have a 2,910-foot minimum radius at a 5.4 percent super elevation, which is adequate for a design speed of 70 mph. The Urban Section will have a 1,760-foot minimum radius at a three percent super elevation, which is adequate for a design speed of 35 mph and 45 mph, depending on the alternative.
- *Stopping sight distance*[7] – The stopping sight distance would be a minimum of 730 feet, which is adequate for a design speed of 70 mph on level grades. This will increase or decrease depending on the grade.
- *LOS* – The LOS for the 2037 design year would be LOS A for both the rural section with the four-lane divided highway and the urban four-lane section with center turn lane, curb, gutter and sidewalk.

[7] Stopping sight distance on a roadway should be sufficiently long to enable a vehicle traveling at or near the design speed to stop before reaching a stationary object in its path. The design speed for the proposed alternatives is 70 mph for rural sections.

- *Bicycle/pedestrian facilities* – The shoulders on the right side of the highway on the rural and urban sections would be shared use lanes but would not be specifically marked for bicycle use. The five-lane section would have a sidewalk for pedestrian use.

Adding one lane in each direction would alleviate the bottleneck caused by the existing two-lane segment and would match the lanes in the northern and southern roadway segments. This would improve the capacity, traffic flow, and reduce driver frustration with delays. Improving the grades, curves, stopping sight distance, access control and clear zone widths to meet AASHTO standards would improve the safety and capacity of the highway. Any of the proposed Action Alternatives would reduce the projected crashes for this segment of US-95 by more than 50 percent.

2.5 Level Two Screening

2.5.1 Develop Alignment Alternatives

An initial range of alternatives that included the No Action and five Action Alternatives; W 1, W-2, C-1, E-1 and E-2, was developed based on the results of the preliminary engineering, environmental studies and public input. The Action Alternatives were categorized and named based on their locations in the west, central or east corridors. The alternatives were presented to the public during alternative workshops on January 19-20, 2005 and April 13, 2005. The purpose of the workshops was to present a range of possible alternatives to the public and to solicit public input. As a result of the alternative workshops, five additional alternatives were developed: W-3, W-4, C-2, C-3, and E-3. The No Action and 10 Action Alternatives were presented in subsequent public meetings on January 18 and 19, 2006.

The Action Alternatives would share the same design elements described above under 2.4.2 Design Elements and Typical Section for Action Alternatives. They would all construct a four-lane highway with Expressway Access Control, improve horizontal curves and vertical grades, and be designed to meet the ITD Design Manual and AASHTO standards. Each alternative would transition from the four-lane divided highway to a four-lane highway with center turn lane, curb, gutter and sidewalk where they reconnect with existing US-95 at the northern end of the project. At the transition the posted speed limit would be reduced from 65 mph to 45 mph. The C-3 Alternative would be have a design speed and posted speed limit of 45 mph in the urban section and the W-4 and E-2 Alternatives would have a design speed and posted speed limit of 35 mph in the urban section. With the exception of Alternative C 1, which uses most of the existing highway alignment, the abandoned sections of existing US-95 may be turned over to the NLHD. It should be noted that the lengths of the W-4, C-3 and E-2 alternatives early in the screening process differ from the lengths analyzed in the DEIS due to a modification of the project limits. As a result, and due to the conceptual level of detail at the time, the lengths and

calculations presented during the screening process may differ from those presented in the DEIS and FEIS for the W-4, C-3 and E-2 alternatives. In addition, the assumptions made when determining residential and business impacts were also different resulting in different numbers. The initial 10 Action Alternatives are shown in Exhibit 11. Initial Alternatives, and described below.

Western Corridor

W-1 would be approximately 8.2 miles long. It would begin just south of Thorncreek Road and would be aligned east of Broenneke Road on its southern end. As the alignment continues north it would then shift west of Jacksha Road. W-1 would reconnect to existing US-95 near the grain elevators south of the South Fork Palouse River Bridge. Overpass structures would be constructed over Jacksha Road, an unnamed private road, and Snow Road approximately 1,000 feet east of the Idaho/Washington State line.

W-2 would be approximately 7.3 miles long. It would begin just south of Thorncreek Road and would be aligned just east of Broenneke and Jacksha roads. W-2 would reconnect to existing US-95 on the north end of the project near the grain elevators south of the South Fork Palouse River Bridge. Overpass structures would be constructed over Jacksha Road and Snow Road approximately three quarters of a mile west of the existing junction of US-95 and Snow Road.

W-3 would be approximately 7.8 miles long. It would begin just south of Thorncreek Road and would be aligned east of Broenneke Road and west of Jacksha Road. This alignment would reconnect to existing US-95 near the grain elevators south of the South Fork Palouse River Bridge. Overpass structures would be constructed over Jacksha Road, an unnamed private road and Snow Road.

W-4 would be approximately 7.5 miles long. It would begin at Thorncreek Road and would closely follow the existing US-95 alignment to approximately three quarters of a mile south of Zeitler Road. The alignment would then shift west of existing US-95. W-4 would reconnect to existing US-95 near the grain elevators south of the South Fork Palouse River Bridge. An overpass structure would be constructed over Snow Road.

Central Corridor

C-1 would be approximately 7.3 miles long. It would begin at Thorncreek Road and would closely follow the existing alignment with minor realignments to flatten the horizontal curves and vertical grades. C-1 would reconnect with existing US-95 near the grain elevators south of the South Fork Palouse River Bridge. No overpass structures would be constructed. C-1 would transition from a four-lane divided highway to a four-lane highway with center turn lane, curb,

gutter and sidewalk at the south entrance to Clyde Road. Since this alignment primarily follows the existing US-95, no section of road would be turned over to the NLHD.

C-2 would be approximately 7.4 miles long. It would begin at Thorncreek Road and would closely follow the existing alignment to Zeitler Road. The alignment would then shift west of existing US-95 and continue north. C-2 would reconnect with existing US-95 near the grain elevators just south of the South Fork Palouse River Bridge. An overpass structure would be constructed over Snow Road.

C-3 would be approximately 6.8 miles long. It would begin at Thorncreek Road and would closely follow the existing alignment to approximately a quarter mile north of Eid Road. It would continue north running east of existing US-95. C-3 would reconnect with existing US-95 at Cameron Road to just south of the South Fork of the Palouse River. An overpass structure would be constructed at Zeitler Road.

Eastern Corridor

E-1 would be approximately 6.6 miles long. It would begin at Thorncreek Road and would closely follow existing US-95 to the top of Reisenauer Hill. From the top of Reisenauer Hill, it would run north to the power lines approximately one half mile from Cameron Road. E-1 would reconnect with existing US-95 near the grain elevators just south of the South Fork Palouse River Bridge. E-1 would be further west than E-2 and E-3. An overpass structure would be constructed at Eid Road.

E-2 would be approximately 6.7 miles long. It would begin at Thorncreek Road and closely follow existing US-95 to the top of Reisenauer Hill. From the top of Reisenauer Hill it would run north continuing to the power lines approximately one half mile from Cameron Road. E-2 would reconnect with existing US-95 near the grain elevators just south of the South Fork Palouse River Bridge. E-2 would be located approximately one half mile east of the E-1 Alternative, closer to Paradise Ridge. An overpass structure would be constructed at Eid Road.

E-3 would be approximately 6.6 miles long. It would closely follow existing US-95 to the top of Reisenauer Hill. From the top of Reisenauer Hill, it would run northwest to the power lines approximately one half mile from Cameron Road. E-3 would connect to existing US-95 just south of the South Fork Palouse River Bridge. E-3 would be located between the E-1 and E-2 Alternatives. An overpass structure would be constructed at Eid Road.

2.5.2 Screen Alternatives

The initial alternatives were evaluated and screened based on environmental and engineering factors. An alternative screening matrix was prepared that displayed the key benefits and environmental resources that could be affected in the project area as a result of the No Action and the 10 Action Alternatives. The criteria that were considered during the screening of the initial alternatives are listed below.

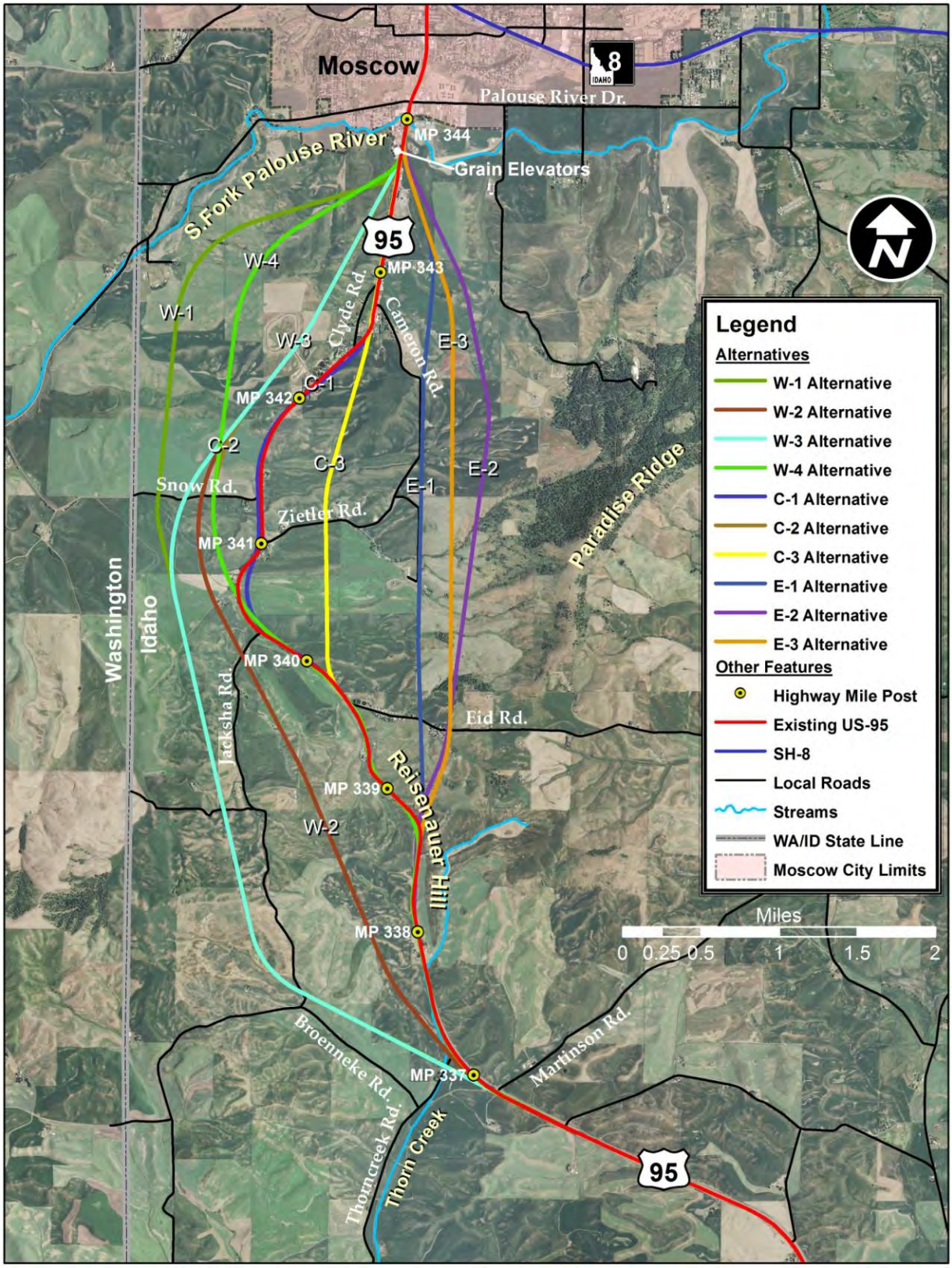
- Air Quality
- Archaeological Sites
- Design Standards
- Displacements
- Environmental Justice
- Hazardous Materials
- Noise
- Prime Farmland
- Right-of-Way Acres
- Socio-Economic
- Ungulates
- Water Quality
- Wetlands and Tributaries
- Estimated Construction Cost
- Historic Sites
- Plant Species and Communities of Concern
- Regulatory Floodways and Floodplains
- Safety
- State Sensitive Species
- Threatened and Endangered Species
- Visual Analysis
- Weather

As a result of the screening process, four alternatives were forwarded for detailed analysis in the DEIS; the No Action Alternative plus one alternative from the western, central and eastern corridors: W-4, C-3 and E-2. Maintaining a representative alternative from each corridor ensured the evaluation of a full range of reasonable alternatives. The remaining Action Alternatives were eliminated from further review. The results of the Level Two Screening were presented in a public meeting on January 18 and 19, 2006. The resource effects were based on a conceptual level of information and design, available at the time. The rationale for eliminating alternatives from further consideration or forwarding them for detailed analysis is summarized in Table 7. Level Two Screening Results. The details of the benefits and effects that were considered are described in the Screening of Alternatives Technical Report.

Table 7. Level Two Screening Results

Alternative	Screening Results	Summary of Rationale for Eliminating or Forwarding Alternatives
No Action	Forwarded for detailed analysis	Minimal environmental effect. Required to be evaluated in an EIS per NEPA regulations
W-1	Eliminated	Highest effects to floodplains and prime farmland of all alignment alternatives. Highest anticipated crash rate for the western corridor alternatives. Higher effects to ungulate habitat, cultural resources, a historic resource and rare plant communities than other alternatives in the western corridor. Other alternatives would have less environmental effects.
W-2	Eliminated	High effects to floodplains, visual resources and prime farmlands. Adverse effects to one historic resource. Other western corridor alternatives had less effect to historic/cultural resources.
W-3	Eliminated	High effects to visual resources, prime farmlands, rare plant communities and floodplains. This alignment also crossed an area known to support ungulate populations.
W-4	Forwarded for detailed analysis	Least cultural resource (based on preliminary information), floodplain and visual quality effects compared to the other western corridor alternatives. No direct effects to ungulate habitat or rare plant communities.
C-1	Eliminated	High effects to historic resources Highest predicted number of crashes. High effects to cultural resources, residential displacement and wetlands.
C-2	Eliminated	High effects to cultural resources. High effects to floodplains, wetlands and visual resources.
C-3	Forwarded for detailed analysis	Least floodplain, visual and wetland effects in the central corridor. No effects to cultural resources.
E-1	Eliminates	Only alternative in the eastern corridor that affects a historic resource. High direct effects to wetlands and rare plant communities.
E-2	Forwarded for detailed analysis	Less effect to wetlands and tributaries compared to other corridor alternatives. Avoided cultural resources. Greater safety benefit compared to alternatives in other corridors
E-3	Eliminated	Similar to E-2 but with slightly higher effects to wetlands. Directly affected two rare plant communities that E-2 avoided.

Exhibit 11. Initial Alternatives



2.6 Comparison of Initial Alternatives

Western Corridor

The four western corridor alternatives have relatively similar effects. All of the alternatives would affect wetlands, floodplains, noise, prime farmlands, visual quality and/or cultural resources. The W-4 Alternative was forwarded for detailed analysis due to its low effects to floodplains, visual quality, ungulate habitat, rare plant communities and a lower crash rate. Based on preliminary information the W-4 Alternative was believed to have less effects to historic resources compared to the other western alternatives. During the more detailed analysis of W-4 it was determined to affect a historic farmstead; however, due to the other factors involved, W-4 would still have been forwarded. The W-1 and W-3 alternatives were eliminated from further consideration due to their higher effects to ungulate habitat, prime farmlands and direct effects to two rare plant communities. In addition, W-1 had the highest crash rate in the western corridor, which does not meet the purpose and need to the same extent as the other alternatives.

Central Corridor

The three central corridor alternatives would all affect cultural resources, wetlands, floodplains, prime farmlands and impact businesses and residences. The C-1 Alternative was eliminated from further consideration because it had the highest crash rate of the three alternatives. It affected two historic resources and had the greatest number of displacements. In addition to these effects the C-1 Alternative also affected 2.9 more acres of wetland than the C-3 Alternative.

While the central corridor alternatives resulted in similar crash rates, C-2 was eliminated due to its higher impacts to wetlands, floodplains and visual effects. The C-3 Alternative was forwarded for detailed analysis because it had no adverse effects to historic resources and had the least wetland, cultural and visual effects compared to the other central corridor alternatives.

Eastern Corridor

The alternatives in the eastern corridor resulted in very similar effects. All of the alternatives in this corridor had effects to wetlands, residences and/or businesses, noise, visual, and prime farmlands. The E-1 Alternative was eliminated from further consideration because it affected one historic resource while the other two alternatives avoided historical resources. In addition, the E-1 Alternative had the highest effects to wetlands and visual quality in the corridor.

The E-2 Alternative was forwarded for further consideration because it had the least effect to wetlands, cultural resources and was the only alternative to not directly affect rare plant communities. The E-3 Alternative effects were very similar to the E-2 Alternative but E-3 resulted in three more residential impacts and twice as many business impacts than E-2. While the residential and business impact assumptions and numbers have been modified since the screening report was prepared, the E-2 Alternative still resulted in overall less impact. The E-3

Alternative directly affected two rare plant communities and resulted in slightly higher effects to prime farmlands compared to E-2. While the differences were small they were higher and more adverse. The E-2 Alternative was forwarded for detailed analysis because it had the least overall effects compared to the other alternatives in the eastern corridor. The Action Alternatives alignments that were forwarded are shown in Exhibit 12. Alternatives Forwarded for Detailed Analysis and detailed in Exhibits 13 -18 Alignment Alternatives Maps.

Exhibit 12. Alternatives Forwarded for Detailed Analysis

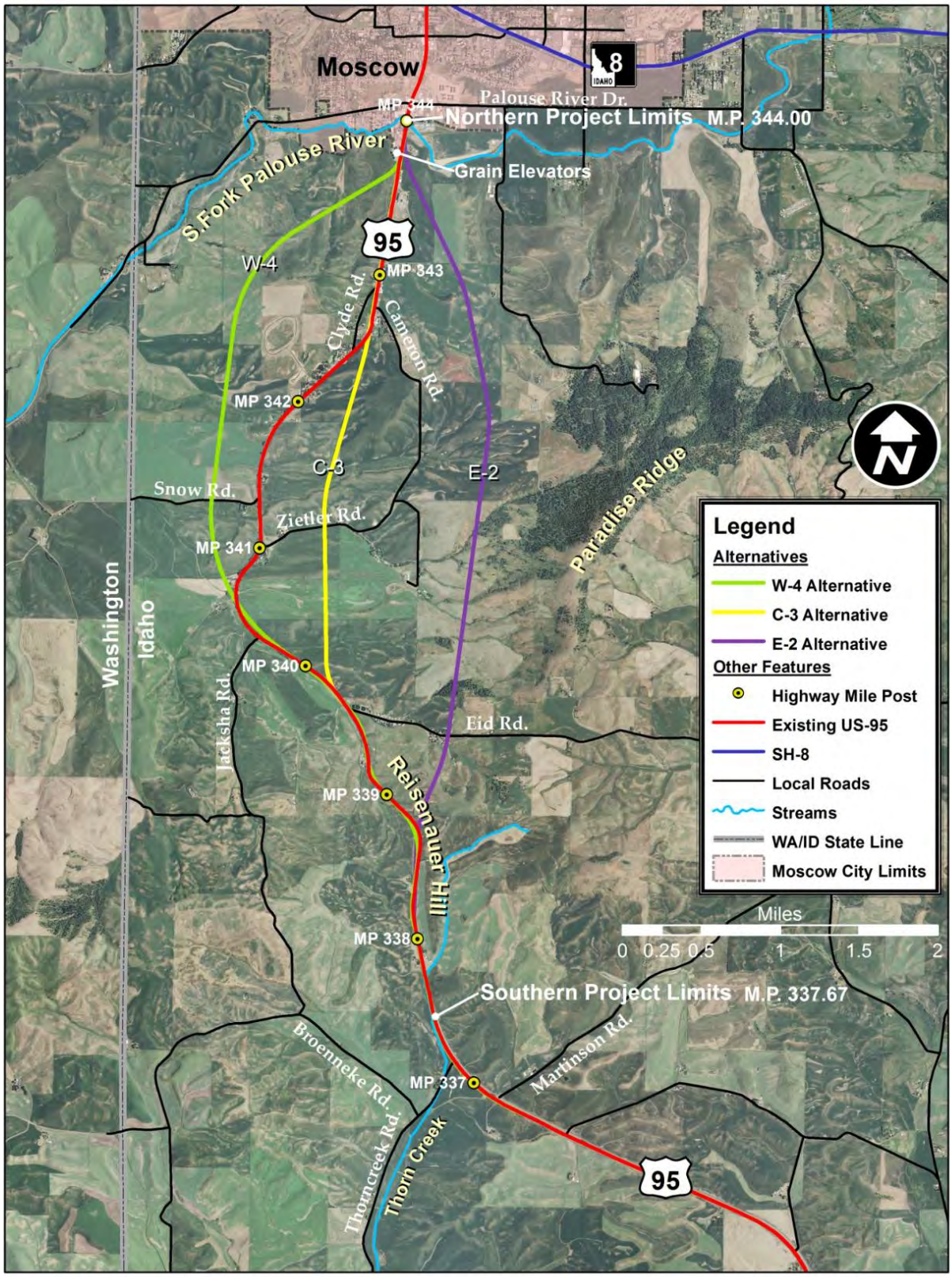


Exhibit 13. Alignment Alternatives

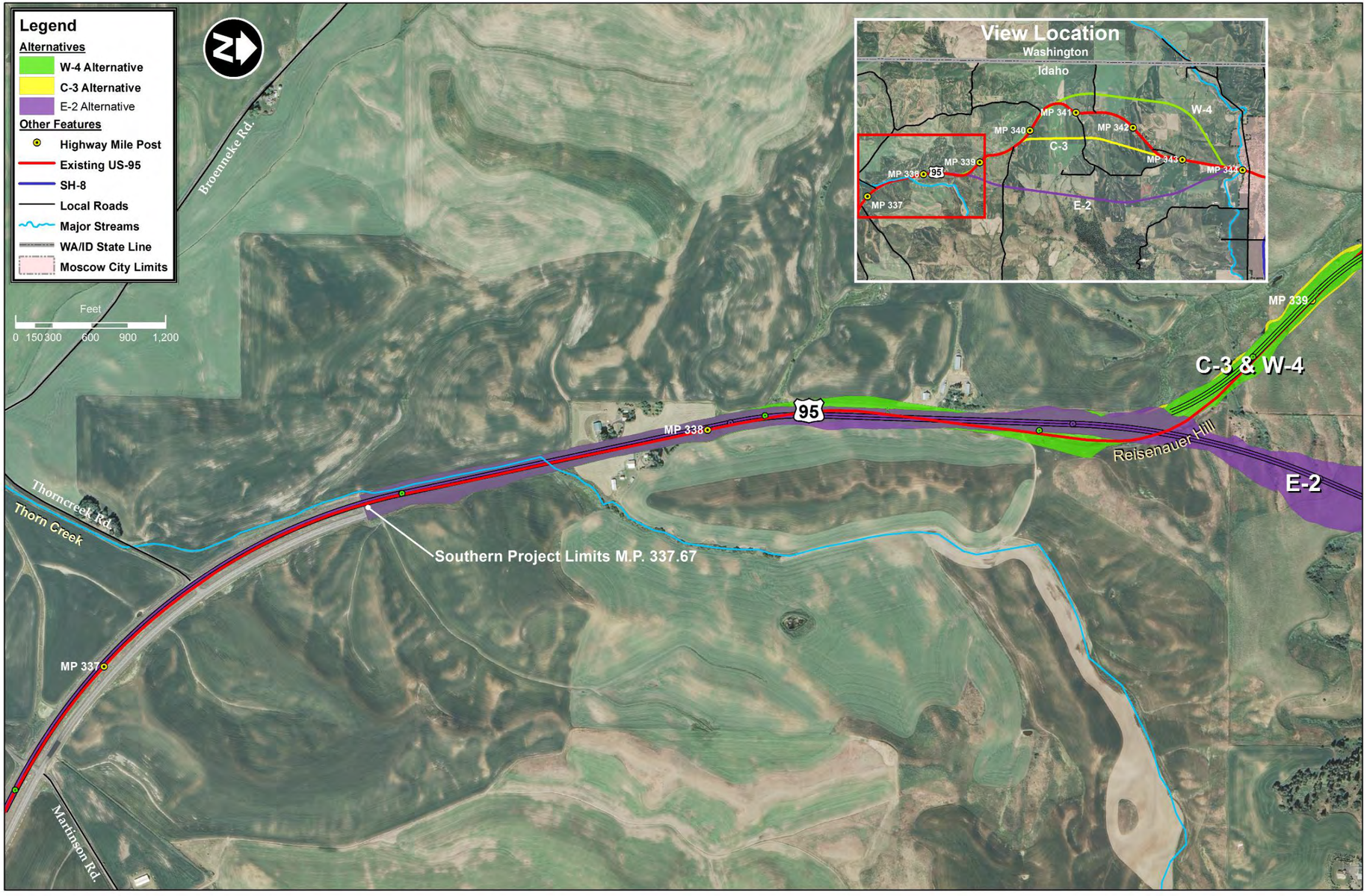


Exhibit 14. Alignment Alternatives

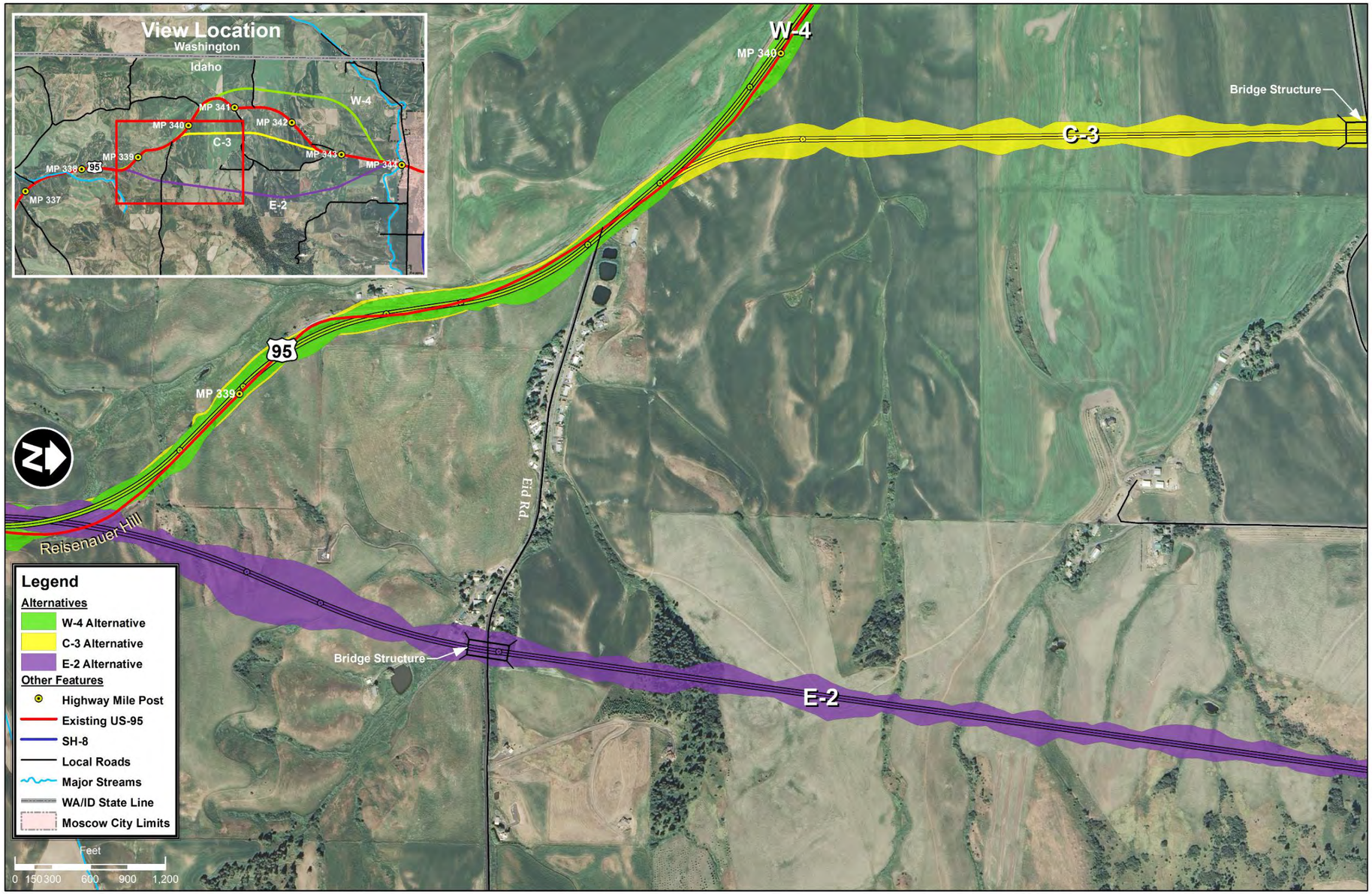


Exhibit 15. Alignment Alternatives

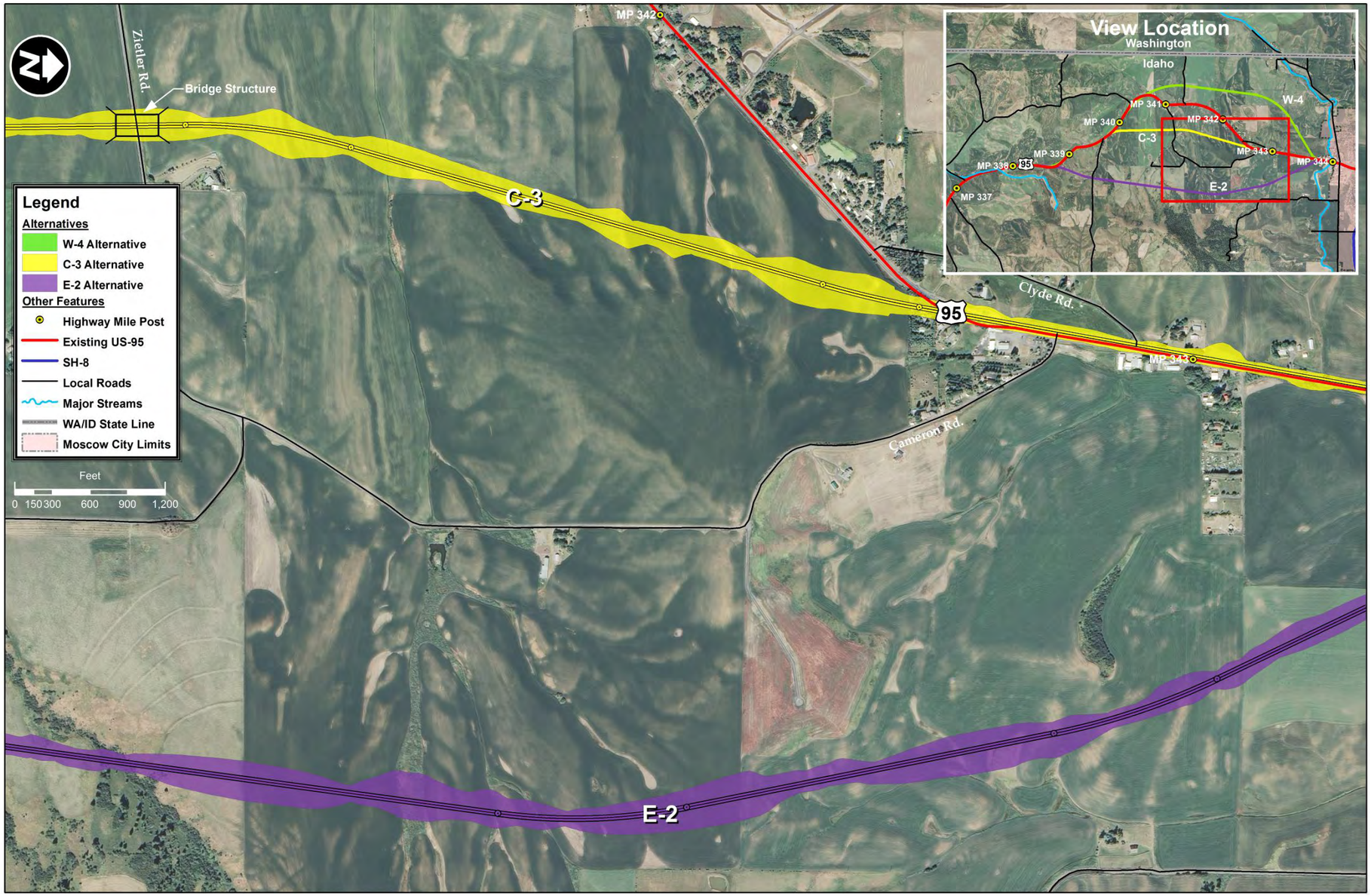


Exhibit 16. Alignment Alternatives

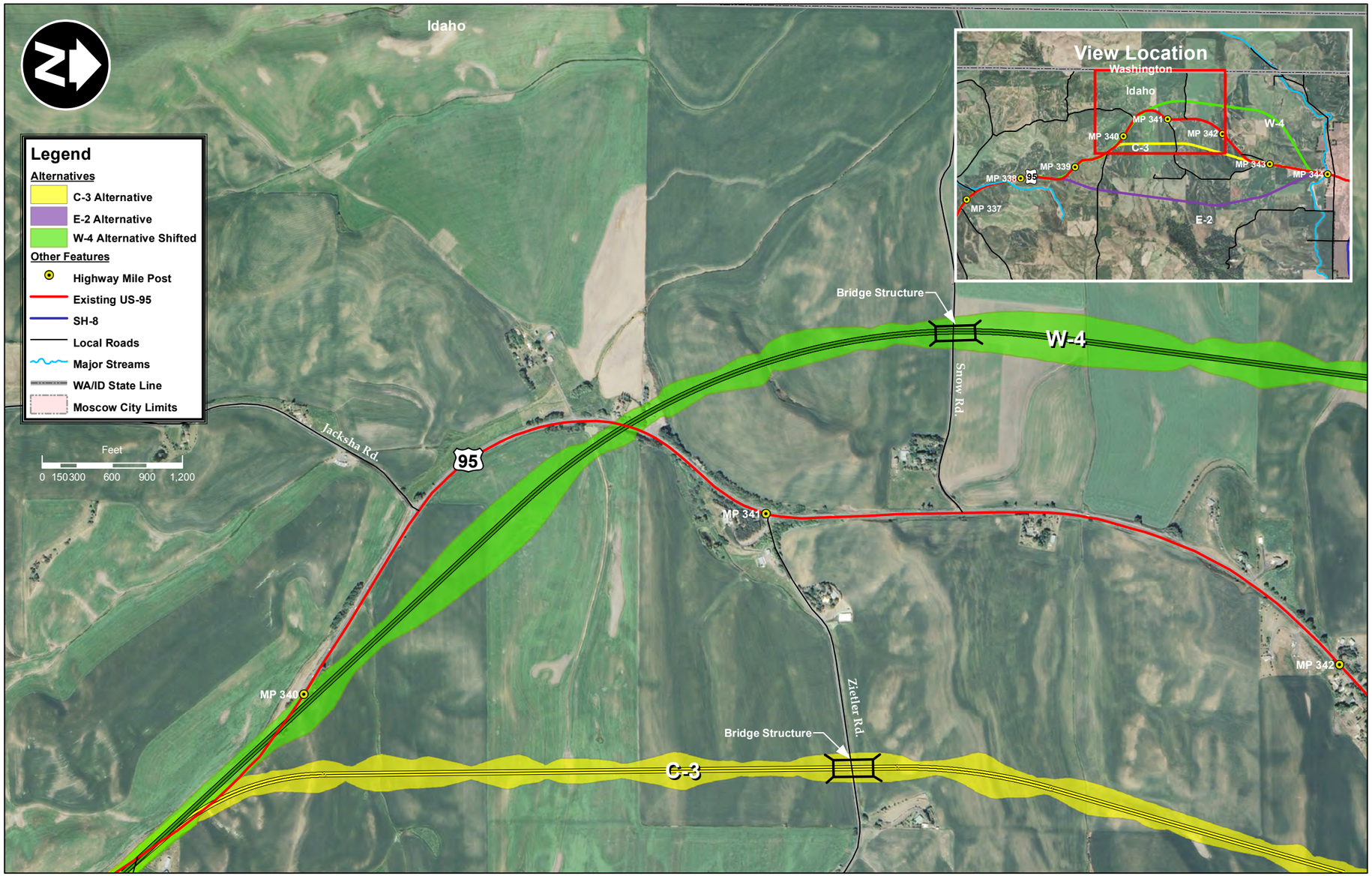
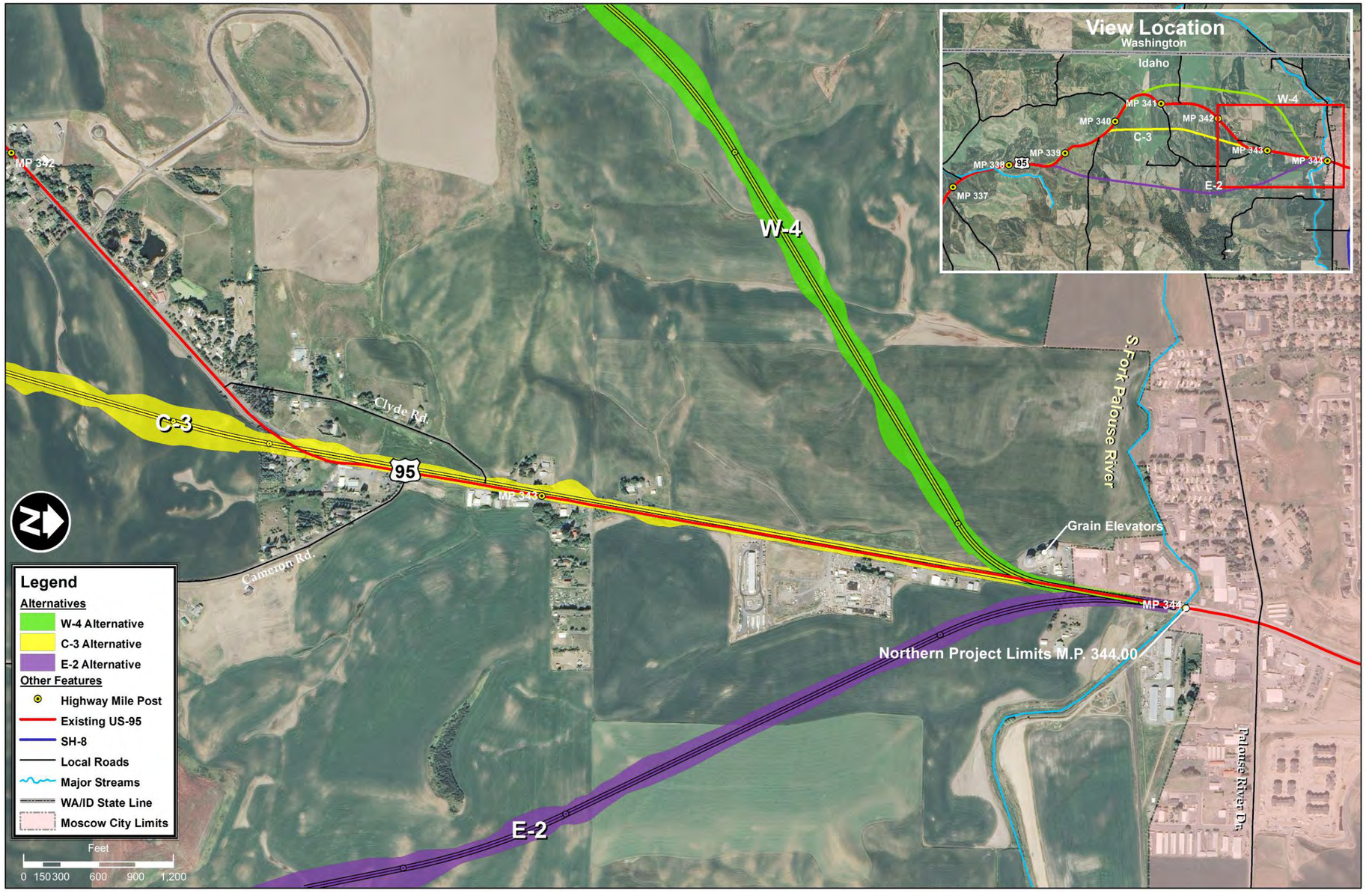


Exhibit 17. Alternatives Alignment



Exhibit 18. Alternatives Alignment



2.7 Comparison of Alternatives

Each of the four alternatives was analyzed for a full spectrum of environmental effects. The major differences between alternatives are described below and summarized in Table 8. Summary of Alternatives' Benefits and Effects. See Chapters 3, Affected Environment and Chapter 4, Environmental Consequences for details regarding specific resources and environmental effects by alternative. Additional detail may also be found in the resource technical reports.

Table 8. Summary of Alternatives' Benefits and Effects

Resources	Alternatives*			
	No Action	Modified W-4	C-3	E-2
Access Points	66	36	47	22
Residential Impacts	0	3	2	7
Additional Potential Residential Impacts	0	2	5	6
Business Impacts	0	0	0	0
Additional Potential Business Impacts	0	0	8	0
Environmental Justice	No disproportionate impact	No disproportionate impact	No disproportionate impact	No disproportionate impact
Right-of-Way new/existing/total (acres)	0	206/45/251	154/55/209	207/22/229
Prime Farmland (acres)	0	49.7	25	50.8
Cultural/Section 4(f) Resource Use	0/0	0/0	0/0	0/0
Air Quality	Attainment Area	Attainment Area	Attainment Area	Attainment Area
Wetlands (acres)	0	1.85	0.99	3.61
Tributaries Number of Crossings/(Linear Feet)	0	10/3,592	5/7,808	5/2,592
Impervious Surface (acres) New alignment/New alignment plus remaining Old US-95 Loop	0/21	58/68	49/58	55/72
Floodplains (acres)	0	1.6	1.8	0
Pine Stand (acres)	0	0	0	3.9
Ungulate - (Deer, Elk & Moose) Population/ Effects to identified Ungulate Impact Area** (acres)	No Population Effect / none	No Population Effect / none	No Population Effect / none	No Population Effect / 4.4

Resources	Alternatives*			
	No Action	Modified W-4	C-3	E-2
Palouse remnants within 1 km (3280 ft.)	0	12	14	24 including Paradise Ridge
Threatened and Endangered Species Effects	No Effect	Not Likely to Adversely Affect	Not Likely to Adversely Affect	Not Likely to Adversely Affect
Hazardous Material Sites	0	4	13 (1 potential cleanup)	4
Noise impacted receptors***	9	No noise impacted receptors would remain after construction	No noise impacted receptors would remain after construction	1 noise impacted receptor would remain after construction
Visual Quality	No Impact	Low = 11% Mod = 58% Mod high = 23% High = 8% MH + H = 31%	Low = 9% Mod = 68% Mod high = 15% High = 8% MH + H = 23%	Low = 3% Mod= 47% Mod high = 25% High = 25% MH + H = 50%
Construction/Total Cost (million $) ****	Minimal	52/62	43/58	46/55

* The lengths of the W-4, C-3 and E-2 alternatives early in the screening process differ from the lengths analyzed in the DEIS due to a modification of the project limits following the level two screening and the conceptual level of detail. As a result the calculations presented during the screening process may differ from the calculations presented in the EIS for the W-4, C-3 and E-2 alternatives.

** Identified Ungulate Impact Area which contains agricultural fields with nearby draws, small drainages, ponds, and cover as described in Melquist 2005a.

***Noise impacted receptors that would be removed due to right-of-way acquisition are not included in these numbers.

****The estimated construction costs includes excavation, rock ballast, plant mix, structures, traffic control and illumination. It excludes engineering, construction engineering, mitigation and right-of-way.

After the Level Two Screening was completed, additional studies were completed and a more detailed level of analysis was used; therefore the project effects may differ slightly from those calculated during the initial screening of alternatives. However, the differences were not substantial and would not result in different screening results.

No Action

The No Action Alternative includes short-term minor restoration activities (safety and maintenance improvements, etc.) that maintain operation of the existing roadway. It would include projects such as turn lanes at public road approaches within the existing right-of-way. It would also include pavement overlays and seal coats to maintain the continuing operation of the existing roadway. The No Action Alternative would serve as a baseline and is required by FHWA NEPA regulations to be considered in the DEIS.

The No Action Alternative would not involve major construction or new right-of-way acquisition. It would continue to have stormwater and air quality effects, but would have the

least overall environmental effect. However, the narrow roadway, roadway curvature and steep grades would still not meet AASHTO standards. It would ascend Reisenauer Hill at an approximately 4.3 percent grade and descend at an approximately six percent grade. With the projected increase in traffic volume the total crashes for the No Action Alternative is estimated to be 27.4 accidents in the year 2017 and 642.5 total crashes from 2017 through 2036. The No Action Alternative would have a LOS D by 2037 and would be substantially more congested than existing conditions. The No Action Alternative would have the worst safety and LOS compared to any of the alternatives and would not meet the project purpose and need.

Modified W-4

After the DEIS was published, the W-4 Alternative centerline was shifted approximately 120 ft east to avoid a historic farmstead and Section 4(f) resource and is now presented in this FEIS as the Modified W-4 Alternative. It would be aligned west of existing US-95. This alternative is 6.65 miles long transitioning to a four-lane with center turn lane, curb, gutter and sidewalk for the last 0.3 miles at the northern end of the project. 2.91 miles of the existing US-95 may be turned over to the NLHD. The Modified W-4 would ascend Reisenauer Hill at an approximately 3.5 percent grade and descend at an approximately 4.9 percent grade. It would impact fewer residences than the E-2 Alternative and would avoid business impacts and potential business impacts. It would impact the same number of hazardous material sites as the E-2 Alternative. It would use the greatest amount of total right-of-way and would result in the greatest number of tributary crossings. Modified W-4 would not affect potential long-eared myotis, northern alligator lizard and pygmy nuthatch habitat associated with ponderosa pine stands near the base of Paradise Ridge.

C-3

The C-3 alignment would run closest to the current highway near the center of the corridor. This alternative is 5.94 miles long transitioning to a four-lane with center turn lane, curb, gutter and sidewalk for the last 1.42 miles at the northern end of the project. 2.71 miles of the existing US-95 may be turned over to the NLHD. C-3 would ascend Reisenauer Hill at an approximately 3.4 percent grade and descend at an approximately 4.8 percent grade. It would have the highest crash rate of the Action Alternatives. It would require the least amount of new right-of-way compared to Modified W-4 and E-2 because it would utilize more of the existing roadway. C-3 would potentially impact up to eight businesses, would encroach on the greatest number of hazardous material sites, and have the greatest impacts to floodplains. It would have the longest urban section but would still operate at a LOS A; however, C-3 would have the least wetland and wildlife species effects. Similar to E-2, C-3 would have the fewest tributary crossings but would affect three times more linear feet of tributary channel compared to the E-2 Alternative.

E-2 (Preferred Alternative)

E-2 would be aligned east of existing US-95 near the base of Paradise Ridge. This alternative is 5.85 miles long transitioning to a four-lane with center turn lane, curb, gutter and sidewalk for the last 0.24 miles at the northern end of the project. Approximately 5.43 miles of the existing US-95 may be turned over to the NLHD. E-2 would ascend Reisenauer Hill at an approximately 4.1 percent grade and descend at an approximately 4.4 percent grade. The evaluation of effects during the screening process and the detailed analyses presented in the DEIS resulted in the lead agencies, FHWA and ITD, identifying the E-2 Alternative as the Preferred Alternative for the following reasons:

- It would have the greatest safety improvement even considering weather and the safety of the existing US-95 loop.
- It would have the fewest access points
- It would have the shortest length of five-lane section, the shortest travel time, and the lowest road user cost
- It would have the least effect to streams
- It would avoid floodplains effects, business impacts and potential business impacts
- It would best meet the project purpose and need

The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge, which provides moderate ungulate habitat. E 2 would also affect pine stands that are pygmy nuthatch habitat and potential habitat for long-eared myotis and northern alligator lizard. It would have the greatest number of residential impacts. The E-2 Alternative would also have the greatest indirect effects to Palouse remnants, planned and ongoing Palouse restoration projects, and a key conservation area for Spalding's catchfly because it could result in more weed establishment and habitat degradation compared to the other alternatives due to its proximity to those sites.

While the difference between the total length of the C-3 and E-2 alternatives is just 0.09 miles, over a 20-year period the travel times and road user costs are substantial. The E-2 Alternative would save 800 hours of travel time and is estimated to cost $19 million less than the C-3 Alternative. This is explained in the US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward (ITD 2014a), which is summarized in Sections 3.10 and 4.10.

An important difference as it relates to safety is the length of the five-lane sections (four-lane section with a center turn lane) between alternatives. The five-lane section has approximately three times more predicted crashes than the divided four-lane rural section because the travel lanes are closer together and the turning movements from the center lane and approaches are

predicted to generate more crashes. Other factors also contribute to the differences in safety including intersections and approaches. The E-2 Alternative would have the fewest country road intersections and the fewest residential and commercial approaches.

An alternative will not be selected until the alternatives' effects and comments on the DEIS and the FEIS have been fully evaluated.

3 AFFECTED ENVIRONMENT

This section describes the existing conditions of the natural and human environment in the study area that could be affected by any of the alternatives presented in the FEIS. Additional detail regarding the resources may be found in the respective technical reports. The data and level of detail are commensurate with the significance and degree of effects. The following environmental resources are evaluated in this chapter:

- Socio-economic and Environmental Justice
- Land Use and Recreation
- Farmland
- Cultural Resources
- Floodplains
- Wetlands and Tributaries
- Groundwater
- Vegetation, Fish and Wildlife
- Threatened and Endangered Species
- Transportation
- Visual Quality
- Traffic Noise
- Air Quality
- Hazardous Materials
- Energy

3.1 Socio-Economic Conditions and Environmental Justice

3.1.1 Regulatory Framework and Policies

Social and economic conditions and environmental justice are governed by the following:

- 23 CFR 771 FHWA Environmental Impact and Related Procedures
- 49 CFR 24; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended
- Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- USDOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations
- Title VI of the Civil Rights Act of 1964
- Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)

3.1.2 Methodology

Three detailed technical reports were prepared to evaluate socio-economic conditions and effects, highway-induced growth and effects to environmental justice (low-income and minority) populations.

The Community Impact Assessment (HDR 2006) evaluated the demographic characteristics of Latah County as a whole as well as the project corridor. Population, including age, race and Hispanic origin, employment, and income were analyzed. General population trends, land use, potential impacts to residences or private property, community cohesion, visual and traffic noise effects were also evaluated. Community members, local officials, and other stakeholders were interviewed to collect information regarding community resources and potential effects.

The Community Profile-Induced Development report (HDR 2005a) evaluated existing socio-economic conditions, land use and development trends in the project area. A Delphi process, which utilized a panel of local experts, was used to predict highway-related growth. The Delphi process relies on the opinions of a panel of experts to provide their assessment of likely future outcomes by responding to several rounds of questions anonymously. The process is done iteratively with controlled feedback. Anonymity allows participants to focus on the issues, not the personalities of the participants. The repeated rounds with feedback from the moderators allow participants to reconsider their responses in light of new information but prevent lobbying for any point of view. The statistical group response gives the range of opinion as well as the most common response. The local panelists in the Delphi process for this project included:

- Michelle Fuson, Latah County Planning Director
- Gundars Rudzitis, University of Idaho Professor
- Shelley Bennet, Realtor
- Walter Steed, City of Moscow Transportation Commission
- Tom LaPointe, Moscow Valley Transit Executive Director
- Travis Wambeke, Local Engineering Consultant
- Orland Arneberg, North Latah Highway District
- Jack Nelson, County Commissioner
- Andrew Ackermann, City of Moscow Assistant Community Development Director
- BJ Swanson, American West Bank
- Cinthya Barnhart, Latah Economic Development Council Executive Director
- Jeff Martin, CEO Gritman Medical Center

The Environmental Justice Report (HDR 2005b) identified minority and low-income populations in the project area and evaluated the effects of each alternative on Environmental Justice populations.

Updated information for each of the reports was prepared in 2011. The findings of the reports and updates are summarized in this section. See the Community Impact Technical Reports.

EO 12898 directs federal agencies to identify and prevent disproportionately high and adverse human health or environmental effects to minority and low-income populations, as a result of federal activities, regardless of population size.

According to USDOT, minority and low-income populations are any identifiable group of minority or low-income persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons who will be similarly affected (FHWA 2009). Effects are determined to be disproportionately high if the adverse effect is predominantly borne by a minority and/or low-income population and is appreciably more severe than the adverse effect that will be suffered by the remainder of the community.

Minority populations are groups that are Black, Hispanic, Asian American, American Indian and Alaskan Native, Native Hawaiian or other Pacific Islander (FHWA 2009).

Low-income populations are a group of persons whose household income is at or below the Department of Health and Human Services (HHS) poverty guidelines (FHWA 2009). The HHS poverty guidelines were $22,050 for a family of four in both 2009 and 2010 (USDHHS 2010).

Adverse effects are the combination of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: injury or death, residential impacts, air quality, noise impacts, water pollution, soil contamination; diminution of aesthetic values; or disruption of community cohesion. It also includes the denial of, reduction in, or significant delay in the receipt of benefits of programs, policies, or activities (FHWA 1998).

The determination of whether there would be a disproportionately high and adverse human health or environmental effects as a result of the alternatives was based on evaluating two factors:

- The presence of minority or low-income populations that could be affected by the alternatives.
- If low income or minority populations are present, are the effects to those populations disproportionately high or adverse.

3.1.3 Existing Conditions

This section discusses the demographic characteristics of Latah County and the Thorncreek to Moscow corridor. Characteristics of the population including age, race, Hispanic origin, employment, and income are presented in this section. See the Community Profile - Induced Development Technical Report and update for details.

The corridor consists of two areas called census block groups: census tract 54, block group 2[8], and census tract 57, block group 3. Those block groups were larger than the actual corridor boundaries, so the data presented in the profile is more inclusive than the actual demographics found in the corridor. The City of Genesee population is excluded from the data for the corridor because the city is classified by the Census as its own unit of geography. By excluding this population center, the analysis area is more representative of the corridor study area as a whole.

Population

The Thorncreek Road to Moscow project consists of primarily undeveloped land dominated by dryland farming. Public land borders a portion of the eastern edge of the project area. The main population center associated with the project area is the City of Moscow with a population of approximately 23,800 according to the 2010 US Census data. The population of the project corridor has experienced a six percent decrease in population between 2000 and 2010 whereas Latah County experienced an increase of nine percent. See Table 9. Population.

Table 9. Population

Year	Latah County	Corridor
2000	34,935	1,307
2004	35,619	1,217
2010	37,244	1,231
Percent Change	+9%	-6%

Population and household forecasts to 2021 for Latah County were available from the Idaho Department of Labor. Latah County's population is forecast to continue increasing moderately reaching 38,797 by 2021. This is an approximately four percent increase. See Table 10. Latah County Population Forecast.

Table 10. Latah County Population Forecast

Year	Population	Estimated Households[9]
2010	37,244	14,708
2016	38,162	15,025
2021	38,797	15,349

[8] Census Tract 54, Block Group 2 was listed as Census Tract 54, Block Group 6 in the original Community Profile report. The Block Group boundary did not change

[9] A household includes all the people who occupy a housing unit as their usual place of residence

Source: Idaho Department of Labor

Population and household forecasts were not available at the corridor level. Yet, based on historic trends, low to moderate increases can be anticipated.

Age

In 2010, the largest concentration of Latah County's population was in the 15 to 24 and 25 to 44 year old age groups. These two age groups totaled more than one-half of the county's entire population. The 45 to 59 year old age group was the next largest. The median age for Latah County was 28 years old. The population distribution, especially with a concentration of persons in the 15 to 24 year old age bracket, is consistent with that of a university town population.

In the project corridor, the 25 to 44 year old and 45 to 59 year old age groups comprised approximately 49 percent of the population. The next largest age group was the under 15 age group. In 2010 the median age in the corridor study area was 40 years old. The study area's population is more similar to an area with families and children.

Race and Hispanic Origin

In 2010 approximately 92.8 percent of Latah County's total population was white. Hispanic origin and other races each comprised 3.7 percent of the populations. The racial minority and Hispanic origin of Latah County in 2010 was nearly 11 percent of the county's total population. See Table 11. Race and Hispanic Origin and Table 12. Percentage Race and Hispanic Origin.

Table 11. Race and Hispanic Origin

Race or Origin	Latah County 2010	Corridor 2010
White	34,557	1,188
Black	293	5
American Indian	237	16
Asian	781	14
Other Races	1,376	8
Total Populations	37,244	1,231
Hispanic	824	20

Source: U.S. Census Bureau, 2010

Table 12. Percentage Race and Hispanic Origin

Race or Origin	Latah County 2010 (percent)	Corridor 2010 (percent)
White	92.8	96.5
Black	0.8	0.4
American Indian	0.6	1.3
Asian	2.1	1.1
Other Races	3.7	0.6
Hispanic origin	3.7	1.6

Source: U.S. Census Bureau, 2010

In the project corridor, 96.5 percent of the total population was white. The racial minority and Hispanic origin population was five percent.

Housing Units

Housing units refer to the structures in which people live, while households refer to the people living in them. In 2010, Latah County had 15,988 housing units. See Table 13. Housing Characteristics. This is a 15 percent increase in housing since 2000.

Table 13. Housing Characteristics

Housing Variable	Latah County 2010	Corridor 2010
Total Housing Units	15,988	604
Occupied Units	14,708	538
Owner-Occupied	*8,265*	*407*
Renter Occupied	*6,443*	*131*
Vacant Units	1,280	66

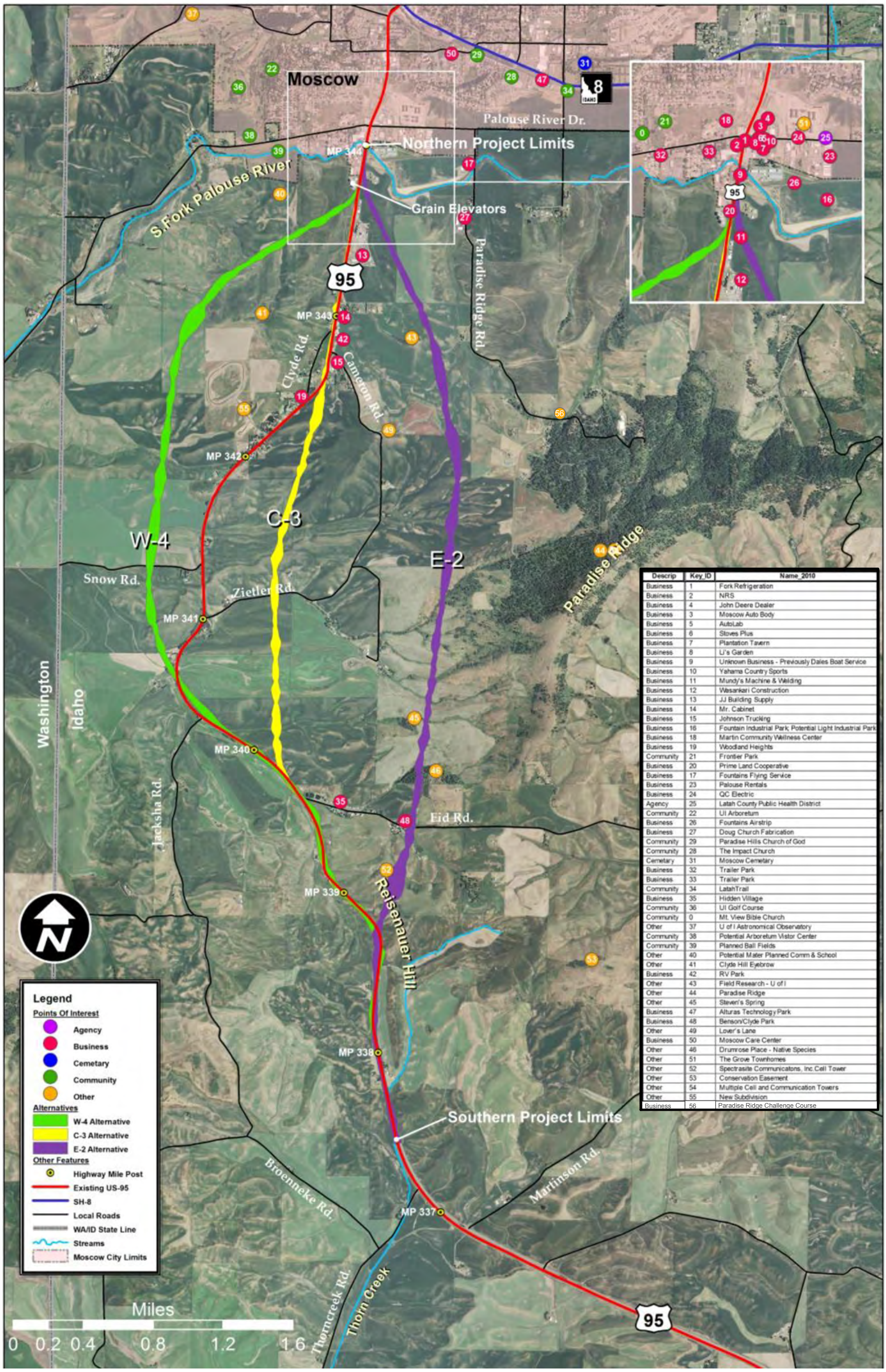
Source: U.S. Census Bureau, 2010

In the project corridor, there was no change in the numbers of housing units between 2000 and 2010. The project corridor has approximately 20 percent more owner occupied homes than Latah County, and has three percent more vacant units compared to the county. See the Community Profile - Induced Development Technical Report and update for more detail.

Community Resources

Exhibit 19. Points of Interest displays the locations of local businesses, landmarks, community resources, environmentally important locations, and recreation sites.

Exhibit 19. Points of Interest



Descrip	Key_ID	Name_2010
Business	1	Fork Refrigeration
Business	2	NRS
Business	4	John Deere Dealer
Business	3	Moscow Auto Body
Business	5	AutoLab
Business	6	Stoves Plus
Business	7	Plantation Tavern
Business	8	Li's Garden
Business	9	Unknown Business - Previously Dales Boat Service
Business	10	Yahama Country Sports
Business	11	Mundy's Machine & Welding
Business	12	Wasankari Construction
Business	13	JJ Building Supply
Business	14	Mr. Cabinet
Business	15	Johnson Trucking
Business	16	Fountain Industrial Park; Potential Light Industrial Park
Business	18	Martin Community Wellness Center
Business	19	Woodland Heights
Community	21	Frontier Park
Business	20	Prime Land Cooperative
Business	17	Fountains Flying Service
Business	23	Palouse Rentals
Business	24	QC Electric
Agency	25	Latah County Public Health District
Community	22	UI Arboretum
Business	26	Fountains Airstrip
Business	27	Doug Church Fabrication
Community	29	Paradise Hills Church of God
Community	28	The Impact Church
Cemetary	31	Moscow Cemetary
Business	32	Trailer Park
Business	33	Trailer Park
Community	34	LatahTrail
Business	35	Hidden Village
Community	36	UI Golf Course
Community	0	Mt. View Bible Church
Other	37	U of I Astronomical Observatory
Community	38	Potential Arboretum Vistor Center
Community	39	Planned Ball Fields
Other	40	Potential Mater Planned Comm & School
Other	41	Clyde Hill Eyebrow
Business	42	RV Park
Other	43	Field Research - U of I
Other	44	Paradise Ridge
Other	45	Steven's Spring
Business	47	Alturas Technology Park
Business	48	Benson/Clyde Park
Other	49	Lover's Lane
Business	50	Moscow Care Center
Other	46	Drumrose Place - Native Species
Other	51	The Grove Townhomes
Other	52	Spectrasite Communicatons, Inc.Cell Tower
Other	53	Conservation Easement
Other	54	Multiple Cell and Communication Towers
Other	55	New Subdivision
Business	56	Paradise Ridge Challenge Course

Employment

Table 14. 2009 Latah County Employment presents the numbers and percentages of the major employment sectors in Latah County. Latah County's unemployment rate was six percent in 2009, compared to eight percent for the State of Idaho.

Table 14. 2009 Latah County Employment

Employment Sector	Employees	Percentage
Farming	1,077	5
Forestry, Fishing	C	-
Mining	C	-
Utilities	20	0.1
Construction	845	4
Manufacturing	437	2
Wholesale Trade	245	1
Retail Trade	2,457	11
Transportation	184	0.01
Information	350	2
Finance and Insurance	460	2
Real Estate	649	3
Services	7,074	33
Government	7,090	33
Other	–	3.89
Total	21,431	100

Source: (U.S. Bureau of Economic Analysis 2009)
C=Confidential information
- No data available

Latah County's full and part-time employment was 21,431 in 2009. The services and government sectors contained the largest number of employees each accounting for about one-third of the county's total employment. Retail trade employment was the third largest employment sector in the county.

The largest employers in Latah County are the University of Idaho and Gritman Medical. Combined, they employ more than 40 percent of the workers in the county (Tacke pers. comm. 2011). Other major government employers include Latah County, the City of Moscow, and School District #281. The major employers in the service sector are Gritman Medical Center and the Good Samaritan Nursing Home. The primary employers in retail trade are Wal-Mart, Winco, and Rosauers Super Markets. Employment data was not available for the forestry, fishing and mining employment sectors. See Table 15. Major Employers in Latah County.

Table 15. Major Employers in Latah County

Employer	Average Number of Employees (Full and Part-time)
University of Idaho	4,000-5,000
Gritman Medical	400-500
Moscow School District	400-500
City Moscow	200-300
University Inn	100-200
Latah County	100-200
Bennett Lumber Products	100-200
Good Samaritan Nursing Home	100-200
Disability Action Center NW	100-200

Source: pers. Comm. Tacke, 2011

Detailed employment data or forecasts were not readily available for the project corridor. However, based on an inventory of the land use, farming, agricultural related services, and general service providers appear to be the primary sources of employment in the corridor.

Latah County's employment projections are based on forecasts prepared for each sector of the county's economy. Latah County's full and part-time employment is forecast to increase by approximately ten percent by 2021. See Table 16. Latah County Employment Forecast. Detailed predictions showed the strongest employment gains are expected in the retail trade, government, and health care trade sectors.

Table 16. Latah County Employment Forecast

Year	Employed Persons
2010	21,012
2016	22,582
2021	23,215

Source: Idaho Department of Labor, 2010

Income

The largest concentration of households in Latah County had incomes below $15,000 in 2009. That income distribution is consistent with an area with a large concentration of university students. The next largest concentration of households in Latah County was in the $50,000 to $75,000 income range. See Table 17. Latah County Households by Income Range.

Table 17. Latah County Households by Income Range

Income Range	Latah County (# of Households)	Corridor (# of Households)
Under $15,000	2,874	147
$15,000 to $25,000	2,405	137
$25,000 to $35,000	1,638	57
$35,000 to $50,000	1,889	118
$50,000 to $75,000	2,705	186
$75,000 to $100,000	1,245	132
$100,000 to $150,00	998	63
$150,000 and More	446	35
Total	**14,200**	**875**

The per capita income in the corridor remained higher ($24,370) than for Latah County ($19,921) in 2010 (HDR 2011a). The higher per capita income in the corridor area compared to the county, generally indicates that the area does not have a higher than average percentage of low-income residents.

3.1.4 Environmental Justice Populations

An Environmental Justice population may include low-income or minority populations. This section provides information regarding the presence of these populations within the study area.

Minority Populations

While minorities are present in the study area, there do not appear to be distinguishable minority populations. Based on the block level analysis, the largest percentage of minorities, 10.6 percent, occurs near the Hidden Village and Benson Mobile Home parks. Approximately 6.6 percent of the populations residing near the Woodland Heights Mobile Home Court are minorities (HDR 2011b).

Low-income Populations

A low-income population for the purpose of environmental justice is based on poverty levels established by Human and Health Services. The poverty level standard in 2009 and 2010 was $22,050 for a family of four (USDHHS 2010). See Table 17. Latah County Households by Income Range and Table 18. Families Living Below Poverty Level. Rental housing can also be used as an indicator of income. Currently, there are no recipients of rental assistance within the corridor (IDHF 2011).

Table 18. Families Living Below Poverty Level

Location	Families (2010)	Families Below Poverty Level (2009)
Latah County	8,268	871 (9.4%)
Census Tract 54, Block Group 2 (previously Block Group 6)	179	5 (3%)
Census Tract 57, Block Group 3	389	6 (2%)

Source: IDHF 2011

Subpopulations of Concern

A windshield survey of the project corridor identified subpopulations that could have low-income populations and a potential source of low-cost housing. These were located at the Woodland Heights Mobile Home Court (previously Valhalla Mobile Home Park), Hidden Village Mobile Home Park and Benson Mobile Home Park. The residences in these facilities included a combination of wood-frame homes, manufactured or mobile homes, trailers and recreational vehicles (RVs). RV's are most commonly temporarily occupied and for the purposes of this description, RVs are distinguished from other types of residences. Income data was not available for the residents and the mobile home park. However, records of need based rental assistance showed that there were no residents in the project area that obtained assistance. Many of the rentals in the corridor study area are located in the general vicinity of mobile home parks.

The Woodland Heights Mobile Home Court is located in the northern portion of the study area on the west side of US-95 approximately two miles south of Moscow (MP 342.5). The park contains 27 spaces for residences and RVs the majority of which are rentals. It currently contains 18 residences and five RVs. Three additional RV spaces are vacant and one additional space for a residence exists. Two additional residences are not managed as part of the facility.

The Hidden Village Mobile Home Park is located on Eid Road on the east side of US-95 approximately five miles south of Moscow (MP 339.6). The park contains 32 residences, only one of which is a rental.

The Benson Mobile Home Park is located on Eid Road just east of the Hidden Village Mobile Home Park. It contains eight residences and two RV spaces all of which are rentals.

3.2 Land Use and Recreation

3.2.1 Regulatory and Policy Framework

Land use and recreation are governed by the following:

- 23 CFR 774-Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites (Section 4(f))
- 1975 Land Use Planning Act of the State of Idaho, Title 67, Chapter 65
- Moscow Comprehensive Plan (City of Moscow 2009)
- Moscow Zoning Ordinance
- Latah County Comprehensive Plan (Latah County 2010)
- Latah County Zoning Map
- Latah County Land Use Ordinance (Latah County 2006)
- Section 6(f) of the Land and Water Conservation Fund (LWCFA)
- 23 USC 138: Preservation of Parklands

NEPA requires that the project action be assessed to determine if it is compatible with existing land use plans. The land use in the project area is regulated through city impact agreements, zoning ordinances and zoning classifications with incorporated areas falling within municipal jurisdiction and un-incorporated areas falling under county jurisdiction.

3.2.2 Methodology

A technical report titled Community Profile - Induced Development (HDR 2005a) was prepared and is summarized in this section. The report evaluated existing socio-economic conditions, land use planning documents and development data in the project area. A Delphi process, involving interviews with a panel of local experts, was used to predict development trends and highway-related growth. It was also used in the evaluation of the alternatives' consistency with land use plans. Reports were prepared in 2011 to provide updated information. See the Community Impact Technical Reports.

Planning documents that govern the land uses in the project area were evaluated to determine if the alternatives would be consistent with city, county and regional land use policies. Existing land uses were verified by comparing geographic information system (GIS) data with the results of field visits in the study area. City and county staff were interviewed and completed questionnaires regarding existing conditions and planned development in 2004 and 2011. A regional analysis and local trends analysis were performed to describe effects related to projected growth within the study area.

3.2.3 Existing Conditions

Land Use

The majority of the corridor is surrounded by agricultural land with associated farmhouses and agricultural buildings. There are clusters of residential development along certain portions of the

corridor (Zeitler Road, Cameron Road, and Clyde Road) and two areas (Woodland Heights Mobile Home Court and Hidden Village /Benson Park) that have a concentration of residences. The northern portion of the corridor is more highly developed with a mix of uses and an emphasis on auto-oriented businesses such as RV parts and service, automotive repair facilities, and trucking services.

Approximately 58 percent of all property in Latah County is privately owned. Nearly 16 percent of the county's land is owned by the federal government with most of that land in the St. Joe and Clearwater National Forest. State held land accounts for five percent of the county and includes the US-95 right-of-way. Most of the state property is endowment land for education. See Table 19. Latah County General Land Ownership.

Table 19. Latah County General Land Ownership

Land Ownership	Acreage	Percentage
Private	404,682	58.7
Forest Industry	126,701	18.4
US Government	108,285	15.7
State	35,577	5.2
University	9,856	1.4
Highway	2,100	0.3
City Owned	1,990	0.3
Railroad	665	0.1
Latah County	493	0.1
School District	296	Less than 0.1

Nearly 96 percent of Latah County is in low intensity land use such as forest land and agriculture. The county contains 3,400 acres of land designated as urban, which accounts for about a half percent of the county's total land. See Community Impact Technical Reports; Community Profile and Induced Development (HDR 2005a).

Low-density residential development is the only type of residential development allowed in unincorporated Latah County. Commercial developments are expected along US-95 at the southern edge of the city limits.

City of Moscow Comprehensive Plan

The City of Moscow adopted a new Comprehensive Plan in 2009. While most of the project area is located outside the City limits, Latah County has adopted the City of Moscow's zoning ordinance and zoning classifications for the area of impact located in the northern end of the project. The land outside the city limits in the Area of City Impact is currently characterized in

the City of Moscow Comprehensive Plan as Auto Urban Industrial. The future planned use includes Auto Urban Commercial, Industrial, Urban Residential and Auto Urban Residential. Zoned by Latah County as Urban Residential, Auto-AF-Agriculture/Forestry with smaller areas of Motor Business Industrial and Commercial along US-95.

The City of Moscow Comprehensive Plan promotes a system of transportation and circulation within and around the city that will make it possible for all people utilizing various modes of transportation to reach their destination as safely and as easily as possible, with the least disturbance possible occurring upon adjacent uses. The plan also states that roads and intersections are to be designed to restrict and control vehicular access along state and federal highways in the Area of City Impact. The area east of US-95 at the southern edge of the city is designated as light industrial use.

The City of Moscow Comprehensive Plan update did not address any of the proposed US-95 alignments but does consider the following potential developments (City of Moscow 2009):

- The City of Moscow plans to develop the Ring Road concept, which is a long range, unfunded improvement. The project is a planned loop around the City of Moscow that would permit through traffic on both US-95 and SH-8 to travel around the perimeter of the City to facilitate circulation in and around Moscow and to reduce congestion from regional through traffic. The Ring Road would be on both sides of US-95 with a crossing just south of the Primeland Silos. The Ring Road Concept has been developed to a point that an alignment is proposed based on topographic conditions, expected design standards, and anticipated use. The concept and alignment have been based upon ITD design standards in the southwest quadrant (US-95 to SH-8) and Minor Arterial Standards in all other quadrants.
- A proposed ball park (parks and open space) was rezoned and annexed into the City. Build-out of the park isn't anticipated for several years but it is included in the Parks and Recreation Master Plan (City of Moscow 2009).
- Future auto-urban commercial land uses are planned along the US-95 corridor entering Moscow.
- Auto-urban residential growth areas have been extended further south of the City.
- The City of Moscow recently worked on a new Master Plan for an Industrial Park that is located north of the South Fork of the Palouse River.

Latah County Comprehensive Plan

Latah County adopted a new Comprehensive Plan and Land Use Zoning (Resolution 2010-32) in December 2010. However, the plan remains relatively unchanged from the previous plan with

the same goals to maintain the largely rural nature of the county. The Comprehensive Plan goals are stated below:

- Preservation of the rural character of Latah County to ensure the protection of the cultural, scenic and natural amenities presently found in the county.
- Preservation of agricultural and forest land uses to ensure the continued viability of an agricultural and forest based economy in rural Latah County.
- Fostering of other land uses which will help achieve a solid broad based and sustainable economic foundation.
- Clustering of commercial and higher density residential uses in and around areas with adequate public services.
- Ensure that land use policies do not unconstitutionally violate private property rights.

The key policies related to transportation and the project in the new Comprehensive Plan includes:

- Limit the number of access points to state and federal highways.
- Ensure that buildings are set back a safe distance from public roads.
- The Ring Road concept is included as a transportation element in the project area (Latah County 2010).

The plans reflect the goals of protecting productive agricultural and forested areas and to identify suitable areas for future residential, commercial, or industrial development.

North Latah County Highway District Transportation Plan

The North Latah County Highway District (NLHD) Transportation Plan was completed in November 2006. This was an update to a previous transportation plan. The plan discusses the potential re-alignment of US-95. It verifies that three alignments are being considered and that once a final alignment is selected, approved, and constructed, the current US-95 roadway will be placed under the jurisdiction of the NLHD (Carscallen pers. comm. 2011). The plan also incorporates the Ring Road concept and alignments.

Other Plans

The Moscow School District is preparing a Long-Range Facilities Plan. The City of Moscow began preparing a transportation plan in 2012 with anticipated completion in 2014.

Recreation

Primary recreational facilities in the project area are shown in Exhibit 19. Points of Interest and include the following:

- Frontier Park
- Paradise Ridge Road (bicycling and hiking)
- University of Idaho Golf Course
- University of Idaho Arboretum
- Planned recreational areas including multi-use ball fields, Latah Trail and an arboretum.
- Planned linear park/pathway along the Southfork of the Palouse River
- Paradise Ridge is privately owned land but is often used recreationally with landowner permission.

The Latah County Comprehensive Plan goals for recreation are to encourage a variety of recreational opportunities in Latah County by implementing policies that:

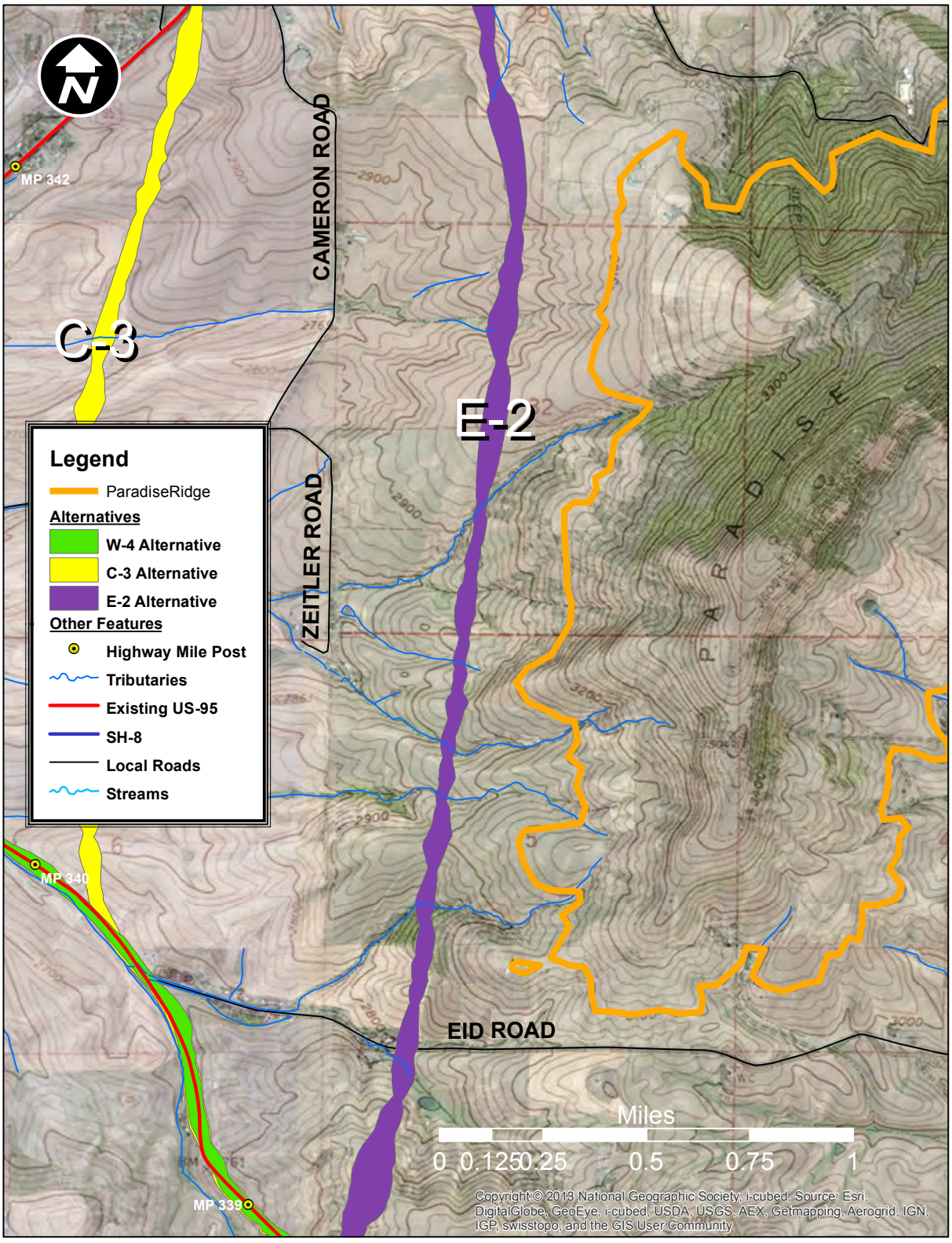
- Encourage the development of suitable land for recreational uses.
- Ensure the compatibility of recreational areas with adjoining land uses.
- Encourage the dedication of land within new developments for recreational use.

3.2.4 Paradise Ridge

Paradise Ridge is a landform located southeast of Moscow. It is a term used by the local community to describe not only the highest elevation of the ridge (3702 ft) but also the area surrounding the ridge. There does not appear to be a defined geographic boundary associated with Paradise Ridge other than the boundary of the South end of Paradise Ridge remnant, which is described in Section 3.8. Therefore, to facilitate the discussion in this FEIS, a boundary for Paradise Ridge was estimated based on topography near the 3100 ft contour. See Exhibit 20. Paradise Ridge.

Paradise Ridge consists of privately owned parcels with primarily rural residential developments, commercial developments, actively farmed land, and Conservation Reserve Program (CRP) land. There are growing rural residential developments on and surrounding Paradise Ridge, which may have roads, driveways, fences, domesticated animals, and other associated human activity but is not considered dense development. It is zoned for one unit per acre. Paradise Ridge has been used recreationally with permission from the private landowners as there is no public access to properties nor are there special protections from development. Paradise Ridge Road is used for biking and walking and local access. It also offers scenic value as described in Section 3.11 and wildlife habitat as described in Section 3.8.

Exhibit 20. Paradise Ridge



3.3 Farmland

3.3.1 Regulatory Framework and Policies

Farmland is governed by the following:

- The Farmland Protection Policy Act (FPPA) of 1981
- Guidelines for Implementing the Final Rule of the Farmland Protection Policy Act for Highway Projects
- State of Idaho Local Land Use Planning Act

The FPPA of 1981 requires that federal projects minimize the conversion of farmland to nonagricultural uses, and that projects consider state and local farmland protection policies to the extent that is practical. Farmland subject to FPPA includes prime and unique farmland and farmland of statewide importance. Farmland considered under FPPA does not have to be currently used for agriculture but cannot be water, urban or developed land (FHWA 1989).

3.3.2 Methodology

A technical report titled Farmland Protection Policy Act (Haagan 2006) was prepared to assess the farmlands in the project area and to determine the relative effects of the alternatives to farmland. The study area was evaluated for prime, unique, and farmland of statewide importance by reviewing farmland soil lists, U.S. Department of Agriculture (USDA) maps and through consultation with Natural Resource Conservation Service (NRCS). A Land Evaluation and Site Assessment were completed in order to rate and rank sites for agricultural importance (Haagen 2006). The information for each alternative was recorded by NRCS staff in the NRCS Form NRCS-CPA-106 in December 3, 2006. See Appendix 1, Key Agency Correspondence and Forms, Farmland Conversion Impact Rating for Corridor Type Projects. The 2006 report was reviewed by the author, Ed Haagen in 2011 and he determined that the crop rotations, farming operations, and leasing arrangements had changed slightly since the original analysis and will continue to change. However, the existing conditions in 2011 do not differ substantially from those in 2006. Site assessment criteria that were considered in the farmland conversion impact rating score for each alternative included:

- Area in non urban use
- Perimeter in non urban use
- Percent of corridor being farmed
- Protection provided by state or local government
- Size of farm unit compared to average
- Creation of non farmable units
- Availability of farm support

- On-farm investments
- Effects of conversion on farm support services
- Compatibility with existing agricultural use

The USDA recommends that alternatives with farmland impact rating scores totaling 160 points or greater be given increasingly high levels of consideration for protection from conversion. See the Farmland Technical Report for more information.

Agricultural lands not considered prime farmlands or prime farmland soils under the USDA definition are also considered under NEPA. The farmland classification system identifies map units as prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance. Further clarification of farmland classifications may be found in the National Soils Survey Handbook (USDA 2007).

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. Examples of these crops include grain, forage, fiber, oilseed, sugar beets, sugarcane, vegetables, tobacco, orchard, vineyard, and bush fruit crops. The land must have the soil quality, growing season and moisture supply needed to economically produce sustained high yields of crops when treated and managed according to acceptable farming methods (USDA 1991). Prime farmland soils currently located in or committed to urban development are not subject to the FPPA.

Unique farmland is land other than prime farmland used for the production of specific high-value food and fiber crops. It has the special combination of soil quality, location, growing season, and moisture supply needed to economically produce sustained high quality and/or high yields of a specific crop when treated and managed according to acceptable farming methods. Examples of such crops include citrus, tree nuts, olives and cranberries.

Farmland of statewide importance is classified by the NRCS as farmland of lesser quality than prime farmland by having the soil, water supply and other characteristics that, with good management, yield productive crops.

Farmland of local importance. In some local areas, there is concern for certain additional farmlands for the production of food, feed, fiber, forage, and oilseed crops even though these lands are not identified as having national or statewide importance.

3.3.3 Existing Conditions

This section discusses general farmland trends, crops and farmland within the study area classified as prime, unique and farmland of statewide importance (Environmental Analysis Bureau 1997).

There are approximately 265,000 acres of cropland in Latah County. Farming operations are generally privately owned family farms but in many cases include leased land. The average farm size in Latah County is 494 acres; however, considering rental property, many producers are farming more than 1,000 acres. The principal crop is winter wheat with an average yield of about 80 bushels per acre. Other primary crops grown in the area include barley, field peas, garbanzo beans and lentils. See Table 20. Latah County Crop Production.

These crops are usually grown in a rotation with winter wheat to prevent disease and control erosion. Spring barley or lentils followed by two or three years of winter wheat would be a normal rotation for the area. Rotations vary depending on the producer's farming operation and the conservation programs in which the farm is enrolled. Table 20. Latah County Crop Production shows the acreages and percentages of crops in Latah County.

Table 20. Latah County Crop Production

Crop	Estimated Acres of Production (2005)	Estimated Percent of Total Production
Wheat	97,068	43
Barley	10,550	5
Peas	21,011	9
Lentils	31,976	14
Garbanzo	10,406	5
Canola	228	Less than 1
Rapeseed	452	Less than 1
Conservation Reserve Program (CRP)	46,410	21
Hay	5,027	2
Pasture	131	Less than 1
Total	223,259	100

There are an estimated 11,000 acres of land designated as crop fields in the project area of which approximately 98 percent is privately owned. The western corridor is considered to have the most productive farmland in the project area. Table 21. Farmland Classifications in Project Corridor shows the farmland types within the project corridor. Farmland classified as Prime and Farmland of Statewide Importance are present in the study area. No farmland classified as Unique occurs in the project area or in Latah County.

Table 21. Farmland Classifications in Project Corridor

Farmland Type	Estimated Land Currently in Production (acres)
Cultivated Crops	9,000
Hay or Pasture	500
Shrub Vegetation	550
Farms, rural residences, commercial areas, forest land, highway right-of-way and water	400
Conservation Reserve Program	1,500

Approximately 1,500 acres of land in the project area is enrolled in the CRP and administered by the Farm Service Agency (FSA). Farmers enrolled in the program agree to remove environmentally sensitive land from agricultural production and plant species that will improve environmental health and quality. The program is voluntary and offers no special protections or long-term protection. Farmers are paid rental rates and enrolled the land for 10-15 years but may cancel enrollment at any time. Offers for CRP contracts are ranked according to the Environmental Benefits Index (EBI) which is based on the relative environmental benefits in comparison to all other offers and selections made from that ranking. The following EBI factors are considered in the CRP lands:

- Wildlife habitat benefits resulting from covers on contract acreage;
- Water quality benefits from reduced erosion, runoff, and leaching;
- On-farm benefits from reduced erosion;
- Benefits that will likely endure beyond the contract period;
- Air quality benefits from reduced wind erosion;
- Cost

The ecological value of CRP program lands as well as its function as matrix habitat is discussed in Section 3.8.

3.4 Cultural Resources

3.4.1 Regulatory Framework and Policies

Cultural resources are governed by the following:

- 16 USC 470-National Historic Preservation Act (NHPA), Section 106 and Implementing Regulations
- 36 CFR 800-Protection of Historic Properties
- 23 CFR 774-Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites (Section 4(f))

- 49 USC 303-Policy on Lands, Wildlife and waterfowl refuges, and historic sites
- 42 USC 1996 and 1996a-American Indian Religious Freedom Act (AIRFA)
- 16 USC 431-433-Antiquities Act
- 25 USC 3001-Native American Graves Protection and Repatriation Act (NAGPRA)
- Idaho Graves Protection Act: Title 27, Idaho Statutes, Cemeteries, and Crematoriums

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in 36 CFR Part 800.

The NHPA defines the National Register of Historic Places (NRHP) criteria for eligibility (A through D), explains the need for properties to retain enough elements of integrity (location, design, setting, workmanship, materials, feeling and association) to be eligible for the NRHP, and defines the meaning of the different effect determinations.

3.4.2 Methodology

The area of potential effect (APE) established for the project was initially based on approximately 250 feet from the centerlines of the alignments and areas immediately adjacent to these locations for each of the Action Alternatives. In 2011, the cultural resource survey technical report was updated and the evaluation area was expanded to approximately 500 feet from the centerlines of the alternatives. In 2015, ITD Cultural Resources Staff was asked to consider impacts to historic properties as a result of the Modified W-4 Alternative. The footprint of the Modified W-4 Alternative, plus an additional 250 feet from the Modified W-4 Alternative centerline was considered during the evaluation.

The Idaho State Historic Preservation Office (SHPO) along with the Nez Perce Tribe and Nez Perce Tribal Historic Preservation Office (THPO) were consulted throughout the process regarding the APE to identify any culturally important sites that should be considered during the survey and EIS development. Consultation between these parties included discussions regarding all proposed alignments, including the Modified W-4 Alternative.

ITD District 2 has been meeting quarterly with the Nez Perce Tribe to consult on planned projects since 2002. This project has been discussed numerous times during that consultation. The dates of Tribal consultation are listed in Chapter 7, Public Involvement and Agency Coordination. The most recent Tribal consultation letters and the ITD Memorandum of Understanding with the Nez Perce Tribe are included in Appendix 1, Key Agency Correspondence and Forms.

Pre-field research including literature reviews, known historical sites, and ethnographic/ historic background were completed. Field studies were completed in 2004, 2005, 2006 and 2011 to determine cultural resource probability, identify cultural resources, document and record historic building and structures, and complete archaeological survey. In addition to visual survey, subsurface shovel testing was completed in selected locations.

An initial report was prepared during the early project scoping but was not distributed with the DEIS Cultural Resource Technical Report due to the confidentiality of the content. The report is titled *A Cultural Resources Probability Study for Idaho Transportation Department's Proposed US 95 Thorn Creek Road to Moscow, Stage 1 Project, Latah County, Idaho* (Sharley and Gough, 2005). The report focused on the likelihood of encountering prehistoric Native American resources in the 12 square mile project area. It cited ethnographic/historic information about Native Americans including information regarding camas root grounds, hunting areas, travel routes, known and predicted camp locations, and the relationships of camps to landscape features such as Palouse highlands, camas meadows and stream valleys. This information helped to identify where sites were most likely to be located and where further investigation should be focused. This report did not dismiss the possibility of significant tribal resources or sites in the project area. Some of the same ethnographic citations were used in subsequent cultural resource surveys for the project.

The following additional cultural resource survey technical reports were prepared to evaluate if archaeological and historic resources are present and would be affected by the alternatives. The information from the reports is summarized in this section.

- *Historic Resources Survey update to An Historic Buildings/Structures Survey for the Idaho Transportation Department's Proposed US 95, Thorn Creek Road to Moscow, Stage 1 Project, Latah County, Idaho* (November 2011) (Cardno-Entrix 2011)
- *Cultural Resources Surveys of Idaho Transportation Department Proposed US-95, Thorn Creek Road to Moscow, Phase 1, Project Latah County Idaho* (AHS 2006)
- *Historic Buildings/ Structures Survey: US-95, Thorn Creek Road to Moscow, Stage 1* (Sharley 2005)

The technical report titled Cultural Resources Surveys of Idaho Transportation Department Proposed US-95, Thorn Creek Road to Moscow, Phase 1; Project Latah County Idaho (AHS 2006) was submitted to the Idaho SHPO in 2006. SHPO concurred with the suggested NRHP eligibility and determination of effects for the alternatives in January 2, 2007.

An update to the 2006 Cultural Resources Survey Technical Report was prepared in November 2011 and was submitted to SHPO for review. In their responses of January 23, 2012 and March 8, 2012, SHPO determined that one additional resource, the Mountain Mart/Goodman Oil Convenience Store, is eligible for listing on the NRHP.

During the evaluation of the Modified W-4 Alternative in 2015, ITD discussed the APE and the level of effort needed with both the Idaho SHPO and the Nez Perce THPO. All parties agreed that no additional fieldwork would be required at this time. Because the Modified W-4 Alternative footprint is so close to the originally proposed W-4 Alternative, and based on the fact that the previous cultural resource (mainly archaeological investigations) fieldwork has not resulted in the identification of archaeological sites, there is little potential for archaeological resources to be present within the APE for the Modified W-4 Alternative. An Addenndum to the 2006 Cultural Resource Survey Technical Report (ITD 2015c) was prepared and submitted to SHPO for review in April 2015. The addendum evaluated the effects of the Modified W-4 Alternative on historic properties. On June 16, 2015, the SHPO provided a letter of concurrence to ITD stating that there would be No Effect to historic properties as a result of the proposed Modified W-4 Alternative. See Appendix 1, Key Agency Correspondence and Forms for associated documentation.

3.4.3 Existing Conditions

Cultural Resources in the APE

Of the potentially historic sites identified within the project APE, three are eligible for listing in the NRHP; the Arthur Snow Farm (house and garage), the Deesten/Davis Farmstead and the Mountain Mart/Goodman Oil Convenience Store, which was demolished in 2014. See the Cultural Resources Technical Report for additional detail. None would be affected by any of the alternatives and is further discussed in Section 4.4 Cultural Resource Effects and Chapter 5. Section 4(f) Evaluation.

Prehistoric cultural resources are not known in the project APE, and while they are likely present, previous survey of more than 50 percent of the existing US-95 corridor has failed to locate any prehistoric sites (AHS, 2006). Native Americans undoubtedly used and traversed the APE; however, there was more ethnographically documented activity along major stream valleys. The large camas meadow at Moscow north of the APE would have been widely used, but no similar camas meadows are known to have existed within the APE. Exploited camas meadows should have associated camp and camas processing sites.

Stream valleys in the project APE provided water, plant, and animal resources and relatively flat land for campsites. While valleys possess the greatest prehistoric site probability, this probability is moderate and the remaining project APE has low prehistoric site probability. The APE is

outside of the area of aboriginal village locations, and lacks a number of the environmental characteristics typical of the known distribution of Nez Perce camps (Sharley and Gough, 2005). Prehistoric camps or resource exploitation sites may be present in the project APE; however, in lower quantities than elsewhere in the region (Sharley and Gough, 2005).

Arthur Snow Farm House and Garage (IHSI #57-13692)

This residence is situated in a low-density residential area in the rolling Palouse hills two miles south of Moscow. The residence was built in 1919 for Arthur Snow, an Idaho State Legislator. It is a large, well-preserved craftsman style house with a matching detached garage that was constructed in 1921. The buildings were once part of a large farm complex; however, the other structures burned down in 2003. The house and garage are the only remaining structures. Removal of the primary features, including the barn, and the absence of important physical information, renders the historic farm complex as a whole ineligible for listing in the NRHP. However, the house and garage are individually eligible for listing in the NRHP under Criteria B for their association with Arthur Snow and Harold Snow, both Idaho State Legislators and influential community leaders. They are both also eligible for listing under Criteria C as excellent, intact examples of craftsman residential architecture and for their artistic merits.

Deesten/Davis Farmstead, Farmstead (Field #US 95 22)

This farmstead is located immediately west of US-95 and approximately four miles south of Moscow. It consists of eight primary buildings; a farmhouse, garage, barn, granary, chicken house, smoke house, shop, and equipment shed. The property is surrounded by actively cultivated Palouse farmland. See Exhibit 21. Deesten/Davis Farmstead as Viewed from US-95.

Exhibit 21. Deesten/Davis Farmstead as Viewed from US-95



The property also includes two groves of trees planted in the 1930s by the Civilian Conservation Corps, an orchard, cottonwoods, a conifer windbreak and a black walnut tree from Germany. The farm was originally patented to William Plummer in 1882 as a cash entry land claim (BLM 2005) and is remarkably intact. The house, barn and other primary buildings are in good condition with no intrusive modern elements. The property is eligible for NRHP listing under Criterion A, for its association with regional agricultural development. The property is also eligible under Criterion C as an excellent example of early 20th century farmstead architecture and layout.

Mountain Mart/Goodman Oil Convenience Store (HS-02)

The Mountain Mart site, also known as Goodman Oil, is located immediately south of the South Fork Palouse River Bridge on the east side of US-95 and is currently abandoned. The property had several buildings located on the site, including fuel pumps, garages and utility buildings. The Mountain Mart office/shop was built in 1963 and was the only structure determined to be eligible for the NRHP; however, the owner demolished it in 2014. The building was octagonal construction, prefabricated materials, and a modernist vernacular design, which is unusual and unique for a rural community in Idaho. The building had a circular, flat roof. Five of the sides were almost entirely glazed in metal units. Three of these sides were vertical, three were light windows, and the north and west faces had metal entrance doors at their center. The central door had a louvered ventilation window. The building was eligible under Criteria C as an excellent example of mid-century modern architectural design. The octagonal/round form, the large glass

exposure, flat roof, metal components and cinderblock walls were all distinctive characteristics of the type, period and method of construction of the genre. Although a comprehensive survey of gas stations has not yet been conducted in Idaho, this example was a rare survivor of the property type. See Exhibit 22. Mountain Mart/Goodman Oil Convenience Store.

Exhibit 22. Mountain Mart/Goodman Oil Convenience Store



3.5 Floodplains

3.5.1 Regulatory Framework and Policies

Floodplains are governed by the following:

- EO 11988 – Floodplain Management
- 23 CFR 650 Subpart A- Location and Hydraulic Design of Encroachments on Flood Plains
- Latah County Land Use Ordinance #269-Flood Zone Overlay

Presidential EO 11988, Floodplain Management, directs federal agencies to avoid to the extent possible adverse effects associated with floodplains and to avoid support of floodplain development.

3.5.2 Methodology

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) dated August 15, 1980 was reviewed. Two separate meetings with Michelle Fusion, the Director of

Latah County Planning and Zoning and Bill Belknap, the Community Development Director of the City of Moscow were conducted to discuss floodplain requirements, effects of the alternatives and potential risk.

Project-related activities are required to demonstrate that they would not cause more than a one-foot cumulative rise in the base flood elevations and that they would be compliant with the National Flood Insurance Program.

A technical report titled *Hydraulic Study for Affected Floodplains on Alternatives Carried Forward* (ITD 2012b) was completed in compliance with 23 CFR 650 part A (ITD 2012b). A new report which also evaluates the Modified W-4 Alternative, titled *Hydraulic Study for Affected Floodplains on Alternatives Carried Forward* (ITD 2014c) supercedes the previous report and discusses the following:

- Flooding risks
- Impacts on natural and beneficial floodplain values
- Support of probable incompatible floodplain development
- Measures to minimize floodplain impacts
- Measures to restore and preserve the natural and beneficial values

3.5.3 Existing Conditions

The FEMA FIRM show 100-year floodplain (Zone A) associated with the South Fork Palouse River and Thorn Creek. The South Fork Palouse River has a designated floodway in addition to the 100-year floodplain. Four floodplain areas associated with tributaries of the South Fork of the Palouse River are located on the western edge of the study area. See Exhibit 27. Floodplain Effects.

3.6 Wetlands and Tributaries

3.6.1 Regulatory Framework and Policies

Wetlands and tributaries are governed by the following:

- 23 CFR 777 – Mitigation of Impacts to Wetlands and Natural Habitat
- USDOT Order 5660.1A - Preservation of the Nation's Wetlands
- 33 CFR 325 –Processing of Department of Army Permits
- 33 CFR 328 – Definition of Waters of United States
- 33 CFR 332 -Compensatory Mitigation for Losses of Aquatic Resources; Final Rule
- 33 USC –Section 401 and Section 404; Clean Water Act
- 33 USC 403-Rivers and Harbors Act of 1899

- 33 USC 1251 -Clean Water Act (CWA)
- 33 USC 1313(d) Section 303-Water Quality Standards and Implementation Plans
- 40 CFR 230-Section 404(b)(1) Guidelines for Specification of Disposal Sites for Dredged for Fill Material
- IDAPA 37.03.07-Idaho Department of Water Resources (IDWR) Idaho Stream Channel Protection Act and the Stream Channel Alteration Rules
- U.S. Army Corps of Engineers Jurisdictional Determination Form Instructional Guidebook
- Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)

Waters of the US as defined by the USACE includes "waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce" [33 CFR 328.3(a)]. This includes all interstate waters, waters from which fish or shellfish could be taken and sold in interstate or foreign commerce, and all tributaries of the waters described above.

Wetlands are defined as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas [33 CFR 328.3(b)].

The Clean Water Act (CWA) establishes national goals and policies to restore and maintain chemical, physical and biological integrity of the Waters of the US. Section 401 of the CWA regulates water quality of Waters of the US. Section 402 of the CWA regulates the discharge of pollutants from point and non-point sources (National Pollution Discharge Elimination System (NPDES)). Section 404 of the CWA regulates the discharge of fill or dredged material into Waters of the US and is implemented by the USACE and EPA.

Waters of the US, including wetlands, that are jurisdictional by the USACE and would be affected, would require a permit through the USACE. Lands meeting the definition of wetland, but which are not considered jurisdictional by the USACE are still considered under 23 CFR 777 Mitigation for Wetlands and Aquatic Habitats which requires a no net loss of wetland function and value.

IDEQ is the state agency responsible for implementing the 401 certification process. IDEQ develops and enforces water quality standards that are intended to protect beneficial uses of a

water body. EPA is responsible for ensuring that the standards, which IDEQ adopts, are aligned with the requirements of the CWA.

IDEQ water quality standards consist of three components: 1) an anti-degradation policy to maintain existing water quality independent of designated uses; 2) beneficial uses designated for a specific water body based on plants and animals present and activities taking place in the waterway; and 3) criteria to protect water quality necessary to support the designated beneficial uses (for example, limits on temperature, dissolved oxygen, pH, turbidity, and ammonia). IDEQ considers physical, chemical, and biological characteristics, geographic setting, scenic qualities and economic and public values when designating a water body's beneficial uses.

The IDEQ releases a report listing and describing impaired segments of water bodies. All impaired waterways are required to have a Total Maximum Daily Load (TMDL) prepared for each pollutant listed as impaired. TMDLs are calculations of the maximum amount of a pollutant that a water body can assimilate while still complying with water quality standards.

3.6.2 Methodology

The following wetland technical reports were prepared to evaluate wetlands and tributaries that could be affected by the alternatives:

- *Thorncreek Road to Moscow Determination of Jurisdictional Waters of the United States* (Gilmore 2005) - This report was incorporated into and replaced by Gilmore 2012.
- *Thorncreek Road to Moscow - Wetland Functions and Evaluation* (Gilmore 2006) -This report was incorporated into and replaced by Gilmore 2012.
- *Thorncreek Road to Moscow, Wetland Delineation Report* (Gilmore 2012) - This is the full and current Wetland Technical Report.

In 2012, the earlier wetland delineations and functional assessments (Gilmore 2005 and Gilmore 2006) were reviewed, considering new guidance and the revised methodology *(Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE 2008)). In addition, ITD worked with the USACE to identify tributaries and wetlands that occur in the project area. In 2012, additional function and value ratings were completed for affected wetlands. The results of the wetland delineation and the function and value assessments for the affected wetlands, were updated and compiled into one comprehensive report titled *Thorncreek Road to Moscow, Wetland Delineation Report* (Gilmore 2012) which also contains detailed maps of the tributaries and wetlands in the study area. The wetland and tributary impacts were recalculated based on the revised information in the Gilmore 2012 report and reflected in the DEIS. Those calculations remain unchanged in the FEIS.

Over 150 acres were evaluated for wetlands. One hundred fifteen test sites were evaluated during the 2004 through 2005 field investigations. The findings were displayed on field data sheets in Appendix C of the 2012 report. The project area was revisited on September 15 and 16, October 3, and December 5, 2011 to determine if substantial land use changes had occurred at or near the resource. The original field data sheets were reviewed based on the changes between the USACE delineation manual (Environmental Laboratory 1987) and the 2008 supplement (USACE 2008) and in light of the most recent wetland regulations and guidance.

The functions and values of the affected wetlands were assessed in accordance with the *Washington State Wetland Rating System for Eastern Washington* (Hruby 2004). The project area borders Washington State and the Washington rating system provides a much more comprehensive assessment of wetland functions and values compared to the Montana Department of Transportation method that has also been used by ITD on projects. This rating system assigns wetlands a category between I and IV based on how well they provide water quality, hydrologic, and habitat functions. Each function is scored on how well the wetland is providing that function and its potential to increase that function within a given area. The maximum score for water quality, hydrologic, and habitat functions are 24, 32, and 32 respectively. The higher the score and percentage of the total, the higher that wetland is functioning for the parameter. The total of the scores for the three functions determines the functional category. Category I is considered the highest quality and is the most difficult to replace. Category IV wetlands are typically disturbed and are considered the most easily replaced.

- *Category I* wetlands are those that 1) represent a unique or rare wetland type; or 2) are more sensitive to disturbance than most wetlands; or 3) are relatively undisturbed and contain ecological attributes that are impossible to replace within a human lifetime; or 4) provide a high level of functions.
- *Category II* wetlands are difficult, though not impossible, to replace, and provide high levels of some functions. These wetlands occur more commonly than Category I wetlands, but still need a relatively high level of protection.
- *Category III* wetlands are 1) vernal pools that are isolated, and 2) wetlands with a moderate level of functions. These wetlands generally have been disturbed in some ways, and are often smaller, less diverse than Category II wetlands.
- *Category IV* wetlands have the lowest levels of functions and are often heavily disturbed. These are wetlands that should be replaceable, and in some cases may be improved.

3.6.3 Existing Conditions

Tributaries

The project area is in the Palouse River Watershed, Water Resource Inventory Area (WRIA) 34. The Palouse River Watershed includes the South Fork Palouse River Subbasin and the Cow Creek Subbasin. The upper three quarters of the project area is in the South Fork Palouse River Subbasin. The lower one-quarter of the project area is in the Cow Creek Subbasin.

There are two primary tributaries in the project area; the South Fork Palouse River and Thorn Creek. All other tributaries in the project area are unnamed and drain to one of these tributaries. Most of the tributaries are intermittent or ephemeral. None of the waterways are part of a National Wild and Scenic Rivers System or a river under study for designation to the National Wild and Scenic Rivers System. See Exhibit 28. Tributary Effects for locations of tributary crossings. Maps and additional detail regarding the tributaries are included in the Wetland Delineation Technical Report (Gilmore 2012).

South Fork Palouse River. The South Fork Palouse River is a perennial stream and a primary tributary to the Palouse River. The Palouse River drains to the Snake River, which flows to the Columbia River. The South Fork Palouse River, the Palouse River, the Snake River and the Columbia River are considered by the USACE to be jurisdictional waters of the US.

The South Fork Palouse River has high flows in the spring and early summer and low flows during the late summer and early fall. Most of the wetlands and floodplains in the Palouse have been drained, straightened, cleared of vegetation or otherwise affected by agriculture, urbanization and associated infrastructure. These areas once retained water during high flows and released water during the low flow periods; however, farming and other developments have affected the streams, wetlands and floodplains, resulting in diminished water storage and attenuation capacity. Therefore, peak flows are intensified resulting in channel erosion, deeply incised channels and flooding (IDEQ 2007).

The IDEQ 2002 Integrated Report lists the South Fork Palouse River as a 303(d) listed [33 USC 1313(d) Section 303], impaired waterbody for sediment, nutrients, stream temperature and bacteria (IDEQ 2005b). The Watershed Assessment and TMDL for the South Fork Palouse River Watershed describes the designated beneficial uses for the South Fork Palouse River Subbasin as cold water aquatic life[10] , salmonid spawning, and secondary contact recreation[11] (IDEQ 2007).

[10] Cold water aquatic life is water quality appropriate for the protection and maintenance of a viable aquatic life community for cold-water species

Thorn Creek. Thorn Creek is an interstate intermittent tributary to Cow Creek, which is a primary tributary of the Palouse River. Thorn Creek is considered by the USACE to be a jurisdictional water of the US.

Thorn Creek is typically dry in the summer and has high peak flows following storm events. It has also been affected by agriculture, urbanization and associated infrastructure with similar intensified peak flows, high erosion, incised banks and sedimentation (IDEQ 2005a).

The IDEQ 2002 Integrated Report listed Cow Creek as an impaired water body for nutrients, habitat alteration and stream temperature (IDEQ 2005a). The Watershed Assessment and TMDL for the Cow Creek Subbasin (IDEQ 2005a) described Cow Creek's beneficial uses as secondary contact recreation and cold-water aquatic life.

Wetlands

Forty-six wetlands were identified and delineated in the project area. The seventeen affected wetlands are shown on Exhibit 29. Wetland Effects. No determination regarding jurisdiction has been made by the USACE at this time; however, all of the wetlands are considered by the FHWA under 23 CFR 777, Mitigation of Impacts to Wetlands and Natural Habitat.

Wetlands may be classified by the dominant vegetation types. Two primary wetland vegetation classifications in the project area are: emergent and scrub-shrub wetlands. Emergent wetlands are characterized by low growing, non-woody vegetation such as grasses, sedges and forbs. In the project area, these wetlands are typically used agriculturally. Scrub-shrub wetlands are characterized by shrubs such as roses, hardhack or red-osier dogwood (*Cornus sericea*).

The majority of the wetlands in the project area are Category III Palustrine Emergent (PEM) wetlands associated with agricultural lands and have been altered by human disturbance. The wetlands are either being farmed or farmed to their boundaries reducing the wetland buffer and hydrologic improving capabilities. The wetlands in the northern half of the project primarily drain to the South Fork Palouse River while the wetlands in the southern half of the project primarily drain into Thorn Creek. Both of these water bodies are listed as impaired waters under Section 303(d) of the Clean Water Act [33 USC 1313(d)]. While these wetlands provide some basic functions they have all been impaired and thus their functions degraded. All but a few of

[11] Secondary contact recreation may include fishing, boating, wading, infrequent swimming, and other activities where ingestion of raw water is not likely to occur

these wetlands have only one vegetation class, emergent, which generally consists of crop or introduced species.

Generally, wetlands in the project area scored higher in water quality functions. This is due to the potential for the wetland to improve degraded water quality, as the two main surface waters are both 303(d) listed and surrounded by farming activities. A few wetlands have two predominant vegetation classes, emergent and scrub-shrub. These wetlands, while still impaired, offer higher functions and values to wildlife and greater diversity. These wetlands are still generally surrounded by agriculture.

The wetlands and tributaries in the project area were delineated and are described in detail in the Wetland Delineation Technical Report (Gilmore 2012). Wetlands that would be affected by any of the Action Alternatives are shown in Exhibit 29. Wetland Effects and are described below. Details regarding the other wetlands and tributaries in the project area may be found in the Wetland Delineation Report (Gilmore 2012).

Wetland 9 is a Category III, PEM, drainage way. The southern end of this wetland is being grazed while the western fringe is being farmed. This wetland is dominated by jungle-rice (*Echinochloa colona*) and reed canarygrass (*Phalaris arundinacea*). Wetland 9 scored over 50 percent for water quality functions using the Eastern Washington Wetland Rating System.

The hydrology from Wetland 9 originates near the intersection of Jacksha Road and US-95 and flows in a northerly direction. It continues toward the South Fork Palouse River through a series of wetlands, tributaries and road culverts. Wetland 9 abuts Tributary I, which drains to the South Fork of the Palouse River. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 10 is a Category III, PEM, grassed drainage in a gently sloped valley. It receives runoff from the east and west sides of US-95. Wetland 10 is dominated by jungle-rice grass and field horsetail *(Equisetum arvense*) and is surrounded by annual cropland. The lower portion is classified as farmed wetland. This wetland scored over 50 percent for water quality functions.

Wetland 10 borders Tributary I, which drains northwest to the South Fork of the Palouse River. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 13 is a Category III, palustrine scrub-shrub (PSS) wetland. It is confined by a steep slope on the north and an area with predominantly higher elevation on the south side. CRP lands are to the north and south of the wetland. There is cropland along the wetland edges with farming

activities up to the grassy borders in the lower reaches. Wetland 13 is dominated by hawthorn (*Crataegus douglasii*), red-osier dogwood, cow parsnip (*Heracleum maximum*), and reed canarygrass. There are also scattered cottonwood trees in the upper portions of the drainage. This wetland scored over 50 percent for water quality functions. Due to its structural diversity, it also provides moderate function for wildlife habitat.

Wetland 13 is contiguous with Tributary W, which flows westerly toward US- 95 through a farmstead and along Zeitler Road. Tributary W continues through Wetland 34 and drains to the South Fork Palouse River through a series of open tributaries and wetlands. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 20 is a Category III, PEM wetland in a large drainage way. Farming activities are occurring through the wetland along most of the reach. Vegetation in the wetland is dominated by reed canarygrass and cultivated spring grain. This wetland scored over 50 percent for water quality functions.

The wetland is contiguous with Tributary N, which flows in a westerly direction to the South Fork Palouse River. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 23 is a Category IV, PEM wetland consisting of two grassed waterways that drain in an easterly direction toward US-95. The predominant vegetation includes meadow foxtail (*Alopecurus pratensis*) and bromes (*Bromus sp.*). The northern and larger portion of the wetland is being farmed up to its border. The southern portion of the wetland is also being farmed. This wetland did not score over 25 percent for any of the functions.

Wetland 23 does not appear to have a surface connection to other waters and does not appear to be adjacent to Tributary P.

Wetland 24 is a Category III, PEM wetland that includes two north-sloping drainage ways. The western portion drains a relatively steep bowl of pastureland. The predominant vegetation includes reed canarygrass, jungle-rice grass, and grazed pasture grasses. The eastern-most portion includes a small pond and has a more gradual gradient. Both drainage patterns converge near the west side of US-95 into a relatively wide grassy area. This wetland scored over 50 percent for water quality functions.

The wetland is contiguous with Tributary Q, which flows in a northerly direction along the west side of US-95 toward Wetland 9. It then flows through a series of wetlands and open roadside

ditches to the South Fork Palouse River. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 25 is a Category III, PEM, grassed drainage, which is surrounded by cropland. This wetland is currently mowed. The predominant vegetation includes meadow foxtail and cultivated grasses for hay. This wetland scored over 50 percent for water quality functions.

The wetland drains in a northerly direction along the west side of US-95 from the toe of the slope to the east toward Clyde Road. The wetland is adjacent to Tributary R which is conveyed through a series of wetlands, open roadside ditches and culverts and to the South Fork Palouse River. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 26 is a Category IV, PEM, drainage surrounded by annual cropland. Farming activities are occurring through most of the wetland. A combination of hillside seeps and slow soil permeability within the cropland contribute to prolonged soil saturation into the spring. Predominant vegetation includes quackgrass (*Elymus repens*), jungle-rice grass, spring grain, prickly lettuce (*Lactuca serriola*), mayweed (*Anthemis cotula*), Canada thistle (*Circium arvense*), and field horsetail. This wetland did not score over 25 percent for any of the functions.

The wetland drains in a northerly direction along the west side of US-95 by Tributary R, to Tributary S which is conveyed through a series of wetlands, open roadside ditches and culverts and to the South Fork Palouse River. The South Fork Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 27 is a Category III, PEM, forked grassy drainage way that drains the toe slope of annual cropland across a flat area. Predominant vegetation includes wild oats (*Avena fatua*) and jungle ricegrass. A combination of upland runoff and the flat topography of the drainage way contribute to prolonged soil saturation in the spring. This wetland scored 50 percent for water quality functions.

The wetland, adjacent to Tributary T, is drained in a northerly direction along the west side of US- 95 toward the South Fork Palouse River. The runoff is conveyed through a recently created wetland along the South Fork Palouse River banks. The South Fork Palouse River is a tributary of the Palouse River. The Palouse River is a major tributary to the Snake River.

Wetland 28 is a Category III, PEM, grassy forked drainage. This wetland is contained within the lower third of a forked drainage way on the east side of US-95. The upper two-thirds of the drainage way possess wetland and tributary characteristics previously defined as PC (Prior

Converted). This wetland is predominantly reed canarygrass bordered by wheat and brome species. This wetland scored 50 percent for both water quality and habitat functions.

The drainage way conveys overland flow from upper croplands in a southerly direction toward US-95. The runoff is conveyed under the highway by a culvert, connecting the surface flow to Tributary P, on to Wetland 19 and Thorn Creek. Thorn Creek flows to Union Flat Creek, a tributary of the Palouse River. The Palouse River is a major tributary to the Snake River.

Wetland 29 is a large Category III, PEM, multi-forked drainage way that carries overland flow in a westerly direction along Eid Road. The wetland consists mostly of wide grassy ditches that flow into defined narrow channels with upland trees just outside the wetland boundary. Predominant vegetation is reed canarygrass. A relatively large man-made pond exists near the upper portion of the tributary of the most southern fork, identified as AW (Artificial Wetland). This wetland scored over 50 percent for water quality functions.

Surface water is conveyed from the wetland through Tributary U toward US-95, traveling under the highway through a culvert toward Tributary Q, to Wetland 9 and 10, and on down Tributary I to the South Fork Palouse River. The South Fork Palouse River is a tributary of the Palouse River. The Palouse River is a major tributary to the Snake River.

Wetland 31 is a Category IV, PEM, long grassy waterway in the middle of annual cropland. Predominant vegetation includes reed canarygrass and dagger-leaf rush (*Eleocharis lanceolata*). Hydrology for Wetland 31 originates from overland flow in a westerly direction toward US-95. The grassy drainage way is relatively flat and extends into the draw beyond the wetland boundary. This wetland did not score over 50 percent for any of the functions.

Water draining from Wetland 31 is conveyed under the highway, and continues through Wetland 10 and Tributary I toward the South Fork Palouse River. The South Fork Palouse River is a tributary of the Palouse River. The Palouse River is a major tributary to the Snake River.

Wetland 32 is a Category III, PSS wetland with an emergent component and grassed waterway. Predominant vegetation includes reed canarygrass, hawthorn and aspen (*Populus tremuloides*). This wetland originates in the foothills of the west-facing slope of Paradise Ridge. This area was defined by aerial photos as a farmed wetland (FW) and wetland (W) (USDA FSA 1979). A man-made pond is found in the upper most portion of Tributary W and is identified as an AW (Artificial Wetland). This wetland scored over 50 percent for water quality functions. Due to its structural diversity, it also provides moderate function for wildlife habitat.

The wetland has both a brushy draw and a wide grassed waterway that conveys overland flow and hillside seeps in a westerly direction through a channelized tributary that travels through a farmstead and along Zeitler Road toward the highway through Tributary W. Tributary W drains Wetlands 13 and 32 in a westerly direction toward US- 95. It continues through Wetland 34, flows under the highway through a culvert and to the South Fork Palouse River through a series of open tributaries (Tributary I) and wetlands (Wetland 10). The South Fork of the Palouse River is a tributary of the Palouse River; the Palouse River is a major tributary to the Snake River.

Wetland 35 is a Category III, PEM wetland area above a man-made pond in a drainage way that comes off Paradise Ridge. Predominant vegetation includes reed canarygrass. The wetland hydrology appears to come from a hillside seep and overland flow. This wetland scored over 50 percent for water quality functions.

Wetland 35 drains to a pond, which overflows to a roadside wetland and under Cameron Road toward Tributary X. Tributary X also carries overland flow from Wetland 14 and 33. The hydrology continues to flow toward US-95 through annually cropped land, through a culvert under the highway, and through a series of open tributaries until it flows into the South Fork Palouse River. The South Fork of the Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 39 is a Category IV, PEM wetland on the edge of an annually cropped field. Predominant vegetation includes reed canarygrass and mayweed. Water appears to pond at this edge near US-95. Hydrology is from a combination of upland and roadside runoff and possibly a high water table. This wetland did not score over 50 percent for any of the functions.

The wetland is adjacent to Tributary Y, which flows along the toe of the highway slope until it crosses under the highway in a westerly direction through a culvert. It then flows through a series of tributaries and wetlands until it drains to the South Fork Palouse River. The South Fork of the Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 40 is a Category III, PEM wetland in grassed drainage surrounded by tilled agricultural land. This wetland follows a swale along the east corridor. Predominant vegetation consists of reed canarygrass and mayweed. This wetland scored over 50 percent for water quality functions.

The wetland is contiguous with Tributary AA, a farm field ditch that flows in a northerly direction eventually draining to the South Fork Palouse River. The South Fork of the Palouse River is a tributary of the Palouse River, which is a major tributary to the Snake River.

Wetland 44 is a Category III, PEM, man-made pond and drainage way located just east of Zeitler Road. Predominant vegetation is reed canarygrass. This wetland scored 50 percent or higher for water quality and habitat functions.

While the pond and surrounding area is wetland, no surface water connection to other tributaries or associated wetlands could be determined.

3.7 Groundwater

3.7.1 Regulatory Framework and Policies

Groundwater is governed by the following regulations and policies:

- 33 USC 1251 Clean Water Act (CWA)
- 42 USC 300-Safe Drinking Water Act (SDWA)

3.7.2 Methodology

Wells were identified within the project area by utilizing data obtained from the IDEQ and IDWR. Wells within 300 feet and within the footprint of each Action Alternative were identified in the DEIS.

A Hydrogeologic Analysis of Alternative Alignments of Highway 95 from Thorncreek to Moscow (Ralston 2014) was prepared after the DEIS was published to respond to public comments. This technical report assesses the hydrologic and geologic settings underlying the alternatives and compares the potential impacts. The hydrogeologic analysis describes groundwater systems typical to each geologic environment and data obtained from well driller reports from the project area.

3.7.3 Existing Conditions

Aquifers

Most of the general project area is underlain by granite. Basalt is present near the western and northern boundaries of the project area. An outcrop of metaphoric rocks occurs in the northern portion of the project area (Ralston 2014).

The project area includes two basalt aquifer systems that supply groundwater in the project area; the Grande Ronde and the Wanapum (Priest Rapids) aquifers. The Wanapum Aquifer overlies the Grande Ronde Aquifer. Neither of these aquifers are sole source aquifers.

Municipal drinking water is generally drawn from the deeper Grande Ronde aquifer. As groundwater withdrawals have increased to meet demands, the Grande Ronde aquifer levels have been declining at a rate of one to two feet per year in some areas indicating little recharge (Hashmi 1995).

The shallow Wanapum aquifer is a primary water source for rural residents, particularly in the eastern portion of the basin. The City of Moscow also draws approximately 30 percent of its water supply from the Wanapum aquifer (City of Moscow 2014). The Wanapum aquifer responds to changes in precipitation and pumping and appears to be recharged from the surface (Palouse Water Conservation Network 2005).

Wells

The wells in the study area were evaluated as part of the new hydrogeological study. Wells typically obtain water from any of three water-producing intervals typical of granitic environments. First, some shallow wells obtain water from near the bottom of the weathered zone where weathering has progressed to produce sand-like material rather than the end result of weathering, which is clay. Second, some wells obtain water from weathering along fractured zones. In some areas, weathering occurs along a fracture zone approximately parallel to land surface at a depth of 100 to 200 feet. This zone may be the result of "unloading" of the weight of the material overlying the granite as erosion exposes it at land surface. Deeper wells obtain water from isolated fracture zones with little weathering products, generally at depths greater than about 200 feet (Ralston 2014).

Wells in the upper aquifer in the City of Moscow yield a maximum of 1,000 gpm; however, most of the wells are for domestic purposes and are pumped at rates less than 30 gpm. All of the wells completed in the lower aquifer in the Moscow area are owned either by the City of Moscow or the University of Idaho. The yields of these wells are large, some exceeding 2,500 gpm (Ralston 2014).

Based on the IDWR database 94 wells were listed in the project area and all were listed as domestic uses. The domestic wells in the project area range from 60 to 650 feet in depth with an average depth of 267 feet (Ralston 2014).

3.8 Vegetation, Fish and Wildlife

3.8.1 Regulatory Framework and Policies

Vegetation, fish and wildlife are governed by the following:

- FHWA TA 6640.8A – NEPA Implementation Guidance for Preparing and Processing Environmental and Section 4(f) Documents
- 16 USC 1531-1544 – Endangered Species Act (ESA)
- 16 USC Sections 1600-1614-National Forest Management Act
- 16 USC Sections 661-667e- Fish and Wildlife Coordination Act
- 16 USC Sections 668-668d -Bald Eagle Protection Act
- 16 USC Sections 703-712-Migratory Bird Treaty Act
- 16 USC Sections 1801-1882-Fishery Conservation and Management Act (1976)
- EO 13186-Responsibilities of Federal Agencies to Protect Migratory Birds
- Federal Noxious Weed Act of 1974
- Magnuson-Stevens Fishery Conservation and Management Act (P.L. 104-297)
- 49 USC 303-Policy on Lands, Wildlife and waterfowl refuges, and historic sites
- IDAPA 20.02.01-Idaho 1974 Forest Practices Act
- Idaho Code, Title 22, Chapter 24, Noxious Weeds

3.8.2 Methodology

Several technical reports were conducted by experts to identify vegetation, wildlife and habitat in the study area and to assess the potential effects of the alternatives. The technical reports are listed below:

Vegetation Studies

The following reports were prepared and are included in the Vegetation Technical Report or the Biological Assessment Technical Report.

Vegetation Technical Report

A Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between the Uniontown Cutoff and Moscow (January 2007). This report describes the potential weeds in the study area. It also describes the potential for the proposed project to spread weeds and discusses mitigation for the potential effects (Lass and Prather 2007).

Memo Documenting Resurvey for Spalding's catchfly in the Project Area (May 2014) was prepared after the DEIS publication. No new plants were found (Lichthardt 2014).

Memo: Effects Analysis of the US Highway 95-Thorncreek Road to Moscow Project for Plant Species and Communities of Conservation Concern was prepared (December 1, 2008). This report prepared by IDFG provides information regarding indirect and cumulative effects to Palouse remnants and to communities of conservation concern. Information from this memo was incorporated into the FEIS.

Biological Assessment Technical Report

Biological Evaluation of Plant Species and Communities of Conservation Concern in the US Highway 95 Thorncreek Road to Moscow Project Area (December 2005). This report discusses the potential occurrence and extent of Palouse remnants and rare plants in the project area. It analyzes the potential effects for the proposed project on plant species of conservation concern and remnant native plant communities that potentially provide habitat for these species (Lichthardt 2005).

Wildlife Studies

Biological Assessment, Thorncreek Road to Moscow Highway Construction Project (December 2007). This study describes the project effects to federally listed and proposed species and designated critical habitat (ITD 2007a). This report was reviewed in November 2011. USFWS provided concurrence that the findings are still valid in December 2011. USFWS provided a clarification to the Spalding's catchfly mitigation in April 2012. See Appendix 1, Key Agency Correspondence and Forms.

General Wildlife Assessment, Thorncreek to Moscow (December 2006). This report is a general assessment of wildlife impacts for the US-95 Thorncreek to Moscow Project. IDFG evaluated alternatives' impacts to a limited number of species that could serve as surrogates for all other wildlife species expected to be present in the project area (IDFG 2006). The initial list of wildlife species was generated from reviewing Idaho state sensitive species lists, primarily the Idaho Comprehensive Wildlife Conservation Strategy (WCS), which summarizes the Species of Greatest Conservation Need (SGCN) information. The Washington State Comprehensive WCS was also reviewed. Of the 229 SGCN, IDFG identified 32 species, including 13 vertebrate and 19 invertebrate species that could reasonably be expected to be present in the project area and, therefore, potentially be impacted by the project.

Of these, various species were expected to be present in the project area for all, some or none of the proposed alternatives. Some species (e.g., Spur throated Grasshoppers, California Myotis) were retained for consideration because there was not sufficient information to remove them from the list and/or IDFG determined they could serve as an appropriate surrogate for other species. The giant Palouse earthworm was considered in the analysis due to high local and academic interest in the species (IDFG 2006).

Habitat associations described in the WCS were compared with available habitat in the project area using maps (IDFG 2006; Lichtart 2005; Lichtart and Mosely 1997), aerial photos provided by ITD and local knowledge was used to determine whether suitable habitat was present in or near the project area. Species were removed from consideration if suitable habitat was not

present, even though the potential exists for some species to occasionally range far from suitable habitat. IDFG suggested protections and mitigations for unavoidable impacts. (IDFG 2006).

Biological Evaluation on the Potential Impacts of Corridor Alternatives from Thorncreek Road to Moscow on Large Ungulates (December 2005). This report evaluates the potential effects of alignments through different corridors (west, central and east) on the habitat and survival of white-tailed deer (*Odocoileus virginianus*), elk (*Cervus elaphus*), and moose (*Alces alces*) in the project area (Melquist 2005a).

Biological Evaluation on the Long-eared myotis and Pygmy nuthatch (December 2005). This report describes the potential effects of the proposed project on the long-eared myotis (*Myotis evotis*) and Pygmy nuthatch (*Sitta pygmaea*) which were classified as Species of Special Concern (SSC) by the IDFG (Melquist 2005b).

Final Review of Wildlife Mitigation for the Thorncreek Road to Moscow Highway Development Project (US-95) (September 2007). This report reviews and summarizes the information in the *Biological Evaluation on Potential Impacts of Corridor Alternatives* (Melquist 2005a) and evaluates the effects of the alternatives to deer, elk and moose and makes mitigation recommendations (Ruediger 2007).

Assessment of Potential Big Game Effects and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow (December 2010). This report summarizes the wildlife reports prepared by Melquist and Ruediger and provides ITD with an independent assessment of the project's effects to potential big game. It also discusses mitigation (Sawyer 2010).

ITD commissioned four different wildlife experts to assess impacts and mitigation for large ungulates. The general descriptions of the reports are in the Section 3.8.2 Wildlife Studies. Each of the experts had similar conclusions regarding the quality of available habitat in the study areas and the relative impacts of the alternatives on that habitat which is stated; however, mitigation recommendations differed.

The Sawyer report was intended to evaluate the mitigation recommendations for the project. Sawyer evaluated and summarized ungulate habitat in the corridors and the relative impacts by alternative. The Sawyer report found that the Melquist and Ruediger reports were consistent regarding general habitat quality and the relative alternatives' effects to habitat. The Sawyer report also provided new information that was available since the previous reports were prepared which also supported the conclusions of the reports.

Both Ruediger and Melquist stated that the alternatives would not have population level effects to ungulates and that no mitigation was required for population level effects. Both offered optional recommendations that included wildlife crossing, fencing, habitat preservation and other measures that could benefit individuals and mitigate for animal vehicle collisions; however, these were not required, nor are they likely to be effective without land use control in the surrounding properties (Ruediger 2007).

Melquist acknowledges that there may be impacts to individual ungulates through increased road kills, possible habitat avoidance, and increased risks to motorists and offers seven recommended actions that would benefit deer, elk, moose, and other wildlife should transportation corridors be constructed. These recommendations include one or two possible wildlife crossings near draws, fencing associated with the crossings, habitat preservation near those crossings and other measures. However, he further states that not implementing a recommended action would not jeopardize populations of any of the species.

Animal/vehicle collisions (AVCs) and associated risks to motorists were considered in the AASHTO Safety Analysis and are mitigated for in the proposed alternatives' design. Clearing vegetation from the clear zone (highway right-of-way), widening the roadway and improving the sight distance are all mitigating factors that are expected to significantly reduce the animal vehicle crashes (AVC). On US-20 between MP 369 and 375, similar improvements reduced the AVC by 85 percent (ITD 2012a). To further mitigate for the possible AVCs, if the E-2 Alternative is selected. See Chapter 9, Environmental Commitments for details of this mitigation.

Ruediger did not recommend stand-alone large game crossings nor did he recommend replacement of lost wildlife habitat. However, in recognition of the resource agencies' desire for mitigation, he made three optional recommendations, all of which were considered and included in the DEIS Chapter 9, Environmental Commitments. These were 1) to provide a wildlife/vehicle crossing at county road underpasses of US-95 where wildlife use is expected and where wildlife are welcome on private lands (deer, elk and moose), 2) to provide oversized culverts to allow for small terrestrial movement and 3) to replace water sources on the east side of the highway should water sources be impacted. See Chapter 9, Environmental Commitments for a list of the mitigation measures that will be implemented for each alternative.

3.8.3 Existing Conditions

The project area has an elevation of between 2,600 and 3,000 ft above sea level. The primary habitat in the project area is plowed and cultivated agricultural or CRP fields. Small patches of conifers, brush, and riparian habitat are retained on the edges of fields, in gullies and on rock

knobs. These patches are too small and fragmented to provide useable habitat for most large terrestrial species (Ruediger 2007).

Paradise Ridge is a geologic landform located southeast of Moscow outside of the project area. It has forested components, grassland, Palouse prairie, rural residential and agricultural lands. Paradise Ridge does not have a specific geographic boundary but for the purposes of this study a boundary is approximately the 3100-foot contour line in Exhibit 20. Paradise Ridge.

The Palouse Bioregion

The project area is at the eastern edge of the Palouse Bioregion. The Palouse Bioregion is an area of the Columbia Plateau characterized by rolling hills of moderate to high relief, with deep soils formed from loess.

Vegetation

Historically the land was an Idaho fescue - wheatgrass vegetation zone which is land dominated by Idaho fescue (*Festuca idahoensis*), bluebunch wheatgrass (*Pseudoroegneria spicata*) with patches of ponderosa pine (*Pinus ponderosa*), snowberry (*Symphoricarpos albus*), hawthorn (*Crataegus douglasii*), aspen (*Populus tremuloides*) and other associated plant species (Lichthardt 2005). This vegetation zone is also classified by the Idaho Natural Heritage Program as Palouse Grasslands.

Approximately 89 percent of the ponderosa pine communities have been lost in Latah County and approximately 99 percent of the Palouse Grasslands have been converted to cultivated agricultural lands (Noss et al. 1995). Loss of Palouse Grasslands has contributed to a number of plant species associated with the Palouse Bioregion being classified as species of conservation concern (Lichthardt and Moseley 1997). The Palouse Grasslands are considered one of the most endangered ecosystems in the US (Noss et. al. 1995).

Palouse Grassland Remnants

Thirty-two areas with remnant Palouse Bioregion vegetation were identified in the project corridor as a result of a study in 2005 (Lichthardt 2005). These Palouse remnants are referred to differently in different reports and may also be referred to as Palouse Grassland remnants or Palouse Prairie remnants. Palouse remnants may contain both grasslands as well as combinations of shrubs and trees. The Palouse remnants identified in Lichthardt's 2005 report were categorized by quality. About 18.3 acres are A-ranked (highest quality) remnants and 17 acres are B or C-ranked (medium high to medium low quality). About 20 acres of grassland are too dominated by annual grasses to be considered a remnant. If the remnants were too infested by weeds (more than 50 percent) they were not considered Palouse remnants (Lichthardt 2005).

The southern end of Paradise Ridge was designated the "South End Paradise Ridge" Conservation Site by the Idaho Conservation Data Center (ICDC) in 1996. It encompasses 106 acres, a little more than half of which is grassland and is the largest of the grassland remnants in the project area. The site also has areas of open pine woodland, pine forest, hawthorn, and ninebark (*Physocarpus (*sp*)*).

The primary threat to the persistence of Palouse remnants in their present state is colonization by weeds. All remnants identified in the project area are bordered completely or partially by weedy vegetation. Annual grasses tend to dominate moderately moist upper slopes, and smooth brome or tall oatgrass occupy the margins of those areas. Among the perennial weedy grasses, tall oatgrass appears to be the most aggressive. The perennial grasses have most likely moved into the remnants, either by rhizomes or seed, from nearby CRP plantings. See the Biological Evaluation of Plant Species and Communities of Conservation Concern in the US Highway 95 Thorncreek Road to Moscow Project Area (Lichthardt 2005) for additional information.

The project area lies near Paradise Ridge, which is considered a key conservation area for Spalding's catchfly as identified in the Recovery Plan for Spalding's catchfly (USFWS 2007). In 2008 USFWS with IDFG began implementing a four phased pilot project in Latah County that included 1) delineation of areas with high potential to support Palouse Grassland remnant plant species, 2) landowner contact and education, 3) field surveys and assessment of potential remnant restoration areas, and 4) development of a comprehensive conservation strategy.

As part of the pilot project, two additional studies of Palouse remnants were completed in 2011. The studies surveyed for Spalding's catchfly and identified potential sites for re-establishment of Spalding's catchfly and identified potential restoration sites. The potential restoration sites that were identified were selected based their potential to connect the Paradise Ridge with other potential remnant areas. The sites were also selected based on soils, topography, and landowner willingness. Landowner easements and agreements have been obtained to implement a variety of practices through several government programs, including Environmental Quality Incentives Program (EQIP)[12], Landowner Incentive Program (LIP)[13], Grassland Reserve Program (GRP)[14],

[12] The Environmental Quality Incentives Program (EQIP) is a voluntary program administered through the NRCS that provides financial and technical assistance to agricultural producers through contracts up to a maximum term of ten years in length. The program plans and implements practices to assist with natural resource and farm production issues.

[13] The Landowner Incentive Program (LIP) is administered by USFWS and provides grant funds to protect and restore habitats on private lands, to benefit federally listed, proposed or candidate species or other at-risk species.

[14] The Grassland Reserve Program (GRP) is a voluntary program administered by USDA for landowners and operators to protect grazing uses and related conservation values by conserving grassland, including rangeland, pastureland, shrubland, and certain other lands. The program emphasizes support for working grazing operations; enhancement of plant and animal biodiversity; and protection of grassland and land containing shrubs and forbs under threat of conversion.

and Partners for Fish and Wildlife (PFW)[15]. The planned and current restoration practices include farming practices to reduce erosion and sedimentation, native plant establishment, conversion of fields from non-native to native seedings, planting Spalding's catchfly, ecological weed control (such as hand pulling weeds) and other activities. These activities were implemented or are planned to be implemented on portions of the sites, which have landowner agreements or easements. See Exhibit 33. Planned and Current Restoration Projects. The actual restoration activities may occur on only a portion of the land that is under a landowner agreement or easement.

One site with landowner agreements for ecological weed control and Spalding's catchfly establishment is approximately 200 feet from the E-2 alignment footprint. See Exhibit 33. Planned and Current Restoration Projects.

ITD, FHWA and USFWS met on July 25, 2012, September 6, 2012 and May 7, 2014 to discuss current and planned conservation efforts, potential project effects and to collaborate on possible mitigation strategies. Based on coordination with USFWS, Latah County Conservation District and Natural Resource Conservation Service (NRCS) sites closer to Paradise Ridge and furthest from the alignments will be prioritized.

Matrix Habitat

The remaining land outside of remnants is primarily agricultural and CRP lands that function as matrix habitat. These matrix habitats (Daily 1997, Daily et al. 2001, Looney et al. 2009, Looney and Eigenbrode 2011, 2012, Ricketts 2001) may be important for wildlife browsing and movement corridors for ungulates, small mammals, bird species, and other wildlife. Matrix habitat also supports a number of species including earthworms, bumblebees and beetles (Hatten & Looney 2013).

CRP fields are planted to perennial habitat (Fargione et al. 2009), which may not always be native vegetation. These CRP lands and other agricultural lands can provide refuge, food and movement corridors for animals that inhabit remnants (Daily 1997, Daily et al. 2001, Ricketts et al. 2001). Multiple studies show that CRP land benefits wildlife (Herkert 2007, Fargione et al. 2009, Stanley 2010, Grovenburg et al. 2012) including migratory grassland birds, ground-dwelling beetles and bumble bees; however, the composition and structure of vegetation in CRP land does not provide equivalent habitats for some animals such as grassland birds (Bakker and

[15] The Partners for Fish and Wildlife (PFW) Program is administered by USFWS and procures short-term easements for restoration activities.

Higgins 2009). Invasive, rhizomatous invasive plants including tall oatgrass were frequently abundant in the borders of remnants next to CRP fields in the project area (Lichthardt 2005).

Rare Plants

Nine plant species listed by ICDC as Species of Greatest Conservation Need, are associated with the Palouse Bioregion and known to occur in Latah County (Lichthardt 2005). See Table 22. Palouse Bioregion Rare Plant Species. IDFG surveyed the project area for these species in 2005. Four of the nine target species were found in the study area; Palouse milkvetch, broad-fruit mariposa lily, Palouse thistle, and Palouse goldenweed. The area was resurveyed near the project area between 2008 and 2010 as part of the IDFG 2011 study (Hill 2011). The rare plants found in the study area are described below.

Table 22. Palouse Bioregion Rare Plant Species

Common name	Scientific Name	ICDC rank*
Jessica's aster	*Aster jessicae*	G2/S2
Palouse milkvetch	*Astragalus arrectus*	G2/G4 Review
Green-band mariposa lily	*Calochortus macrocarpus var. maculosus*	G5T2/S2
Broad-fruit mariposa lily	*Calochortus nitidus*	G3/S3
Palouse thistle	*Cirsium brevifolium*	G3/S2
Idaho hawksbeard	*Crepis bakeri ssp. idahoensis*	G4T2/S2
Palouse goldenweed	*Haplopappus liatriformis*	G2/S2
Ample monkey-flower	*Mimulus ampliatus*	G1/S1
Spalding's catchfly	*Silene spaldingii*	G2/S1 (Federally listed as threatened)

* These ranks reflect the condition of the species rangewide. G-ranks are rangewide ranks that are assigned by Nature Serve and S-ranks are statewide ranks that are assigned by the ICDC. Rankings are explained in detail in Appendix 4.

Palouse milkvetch. Palouse milkvetch was rated between imperiled and secure globally (G2/G4) but based on updated data is now considered imperiled globally (Nature Serve 2011). Palouse milkvetch was found in two places in the study area; in a grassland remnant and on a road cut (Lichthardt 2005).

Broad fruit mariposa lily. Broad-fruit mariposa lily was considered vulnerable both globally and in Idaho State (G3/S3) but based on updated data is now considered imperiled globally (Nature Serve 2011). Five very small populations were found in the study area, ranging from 1 to 20 individuals. This perennial occurs almost exclusively in Idaho in open habitats (Lichthardt 2005).

Palouse thistle. Palouse thistle is considered globally vulnerable and imperiled in Idaho State (G3/S2) but based on updated data is now considered globally vulnerable (Nature Serve 2011).

More than 20 populations were found in occasional stands of snowberry or ponderosa pine. Palouse thistle spreads by creeping roots; therefore, it is difficult to determine what constitutes an individual. This plant occurs in grasslands and scablands[16] (Lichthardt 2005) ranging from northeast Oregon, Eastern Washington and east to Idaho.

Palouse goldenweed. Palouse goldenweed is considered both globally and state imperiled (G2/S2) but based on updated data is now considered globally vulnerable (Nature Serve 2011). It was found in all but two grassland remnants as well as many patches too small or too weedy to qualify as remnants. Moscow is near the center of the global range of this species. This perennial occurs primarily on the Palouse in rocky soils (Lichthardt 2005).

Invasive Plants

Latah County has about 260 listed non-native, invasive plant species that affect agricultural, rangeland, pastures, and forests. Roadsides were sampled for invasive plants or weeds. Weeds found at most sites included Canada thistle, common mullein, downy brome, and prickly lettuce. Established sites usually had reed canarygrass. Sites with exposed soil always had annual bromes and ventenata.

Invasive plant species that are commonly encountered in and adjacent to the project area have demonstrated their ability to become problems within native grasslands with the ability to produce more than 20 percent foliar cover or to dominate other grasslands. These species are presented in Table 23. Invasive Plants for Prairie Habitats. See Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between the Uniontown Cutoff and Moscow (Lass and Prather 2007) for additional detail. Latah County has about 260 listed non-native, invasive plant species that affect agricultural, rangeland, pastures, and forests. Roadsides were sampled for invasive plants or weeds. Weeds found at most sites included Canada thistle, common mullein, downy brome, and prickly lettuce. Established sites usually had reed canarygrass. Sites with exposed soil always had annual bromes and ventenata.

Table 23. Invasive Plants for Prairie Habitats

Common Name	Scientific Name
Bachelor's button	*Centaurea cyanus*
Blackgrass	*Alopecurus myosuroides Huds.*
Bur chervil	*Anthriscus caucalis*
Canada thistle	*Cirsium arvense*
Chamomile/pineapple weed complex	*Matricania matricariodes*

[16] Terrain consisting of bare rock surfaces, with little or no soil cover and scanty vegetation, that have been deeply channeled by glacial flood waters.

Common Name	Scientific Name
Cluster tarweed / coastal tarweed	*Madia glomerata*
Downy brome "cheatgrass"	*Bromus tectorum*
Field bindweed	*Convolvulus arvensis L.*
Interrupted windgrass	*Apera interrupta (L.) P. Beauv.*
Japanese brome	*Bromus japonicus*
Jointed goatgrass	*Aegilops cylindrical Host*
Meadow brome	*Bromus biebersteinii Roemer & J.A. Schultes*
Prickly lettuce	*Lactuca serriola L.*
Quackgrass	*Elymus repens (L.) Gould*
Reed canarygrass	*Phalaris arundinacea L.*
Smooth brome	*Bromus inermis Leyss.*
Soft brome	*Bromus hordeaceus L.*
St John's wort	*Hypericum perforatum L.*
Sulfur cinquefoil	*Potentilla recta L.*
Tall oatgrass	*Arrhenatherum elatius (L.) Presl.*
Tumble mustard	*Sisymbium altissimum L.*
Ventenata	*Ventenata dubia [Leers] Gross. & Dur.*
White bryony	*Bryonia alba L.*
Yellow starthistle	*Centaurea solstitialis L.*

Invasive plant species that are commonly encountered in and adjacent to the project area have demonstrated their ability to become problems within native grasslands with the ability to produce more than 20 percent foliar cover or to dominate other grasslands. These species are presented in Table 23. Invasive Plants for Prairie Habitats. See Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between the Uniontown Cutoff and Moscow (Lass and Prather 2007) for additional detail.

Lichtardt also listed several species that she observed to have already invaded the Palouse remnants and grasslands that she surveyed in the project area. The greatest threat to the prairie is perennial grasses. See Table 24. Invasive Plants in .

Table 24. Invasive Plants in Remnant Grasslands

Common Name	Scientific Name
Cheatgrass	*Bromus tectorum*
Kentucky Bluegrass	*Poa pratensis*
Meadow foxtail	*Alopecuris pratensis*
Common crupina	*Crupina vulgaris*
Grassy tarweed	*Madia gracilis*

Bachelor's button	*Centaurea cyanus*
Bur chervil	*Anthriscus caucalis*
Downy brome "cheatgrass"	*Bromus tectorum*
Japanese brome	*Bromus japonicus*
Smooth brome	*Bromus inermis Leyss.*
Soft brome	*Bromus hordeaceus L.*
St John's wort	*Hypericum perforatum L.*
Tall oatgrass	*Arrhenatherum elatius (L.) Presl.*
Ventenata	*Ventenata dubia [Leers] Gross. & Dur.*
White bryony	*Bryonia alba L.*
Yellow starthistle	*Centaurea solstitialis L.*

Sixty-four noxious weeds are listed in Latah County. Of those, five species of noxious weeds were found in the project area (Lass and Prather 2007). See Table 25. Noxious Weeds in Project Corridor.

Table 25. Noxious Weeds in Project Corridor

Common Name	Scientific Name	Category*
Common crupina	*Crupina vulgaris*	Control
Jointed goatgrass	*Aegilops cylindrical*	Containment
Field bindweed	*Convolvulus arvensis*	Containment
Canada thistle	*Cirsium arvense*	Containment
Yellow starthistle	*Centaurea solstitialis*	Containment

*Control =to prevent plants from seeding. Containment =to limit the area that the weeds spread.

Individual plants or small infestations were noted along the alternatives' alignments; however large infestations of St. John's Wort, burr chervil, and reed canarygrass were found. Invasive plants along the US-95 right-of-way with infestations greater than a half acre include ventenata, field bindweed, reed canarygrass, tall oatgrass, and blackgrass.

Wildlife Species

The study area is highly modified through agriculture, rural residences and commercial development, and nearly all of the native pine stands and grasslands have been converted to other land uses. The remaining habitat supports both indigenous and non-native wildlife species. Many species are habitat generalists, which, while important locally, are mainly species already adaptable to habitat modifications, fragmentation and high levels of human use (Sawyer 2010).

Wildlife Conservation Strategy Species (WCS)

The WCS is the State of Idaho's guiding document for managing and conserving at-risk species. It divides the state into Ecological Sections based on habitat. The US-95 Thorncreek to Moscow project area lies entirely within the Palouse Prairie Ecological Section. The WCS maps the majority of the study area as farmable land and non-native herbaceous. It lists wildlife species expected to reside in or migrate through the Palouse Prairie Ecological Section for each habitat type.

As described in Section 3.8.2, Methodology, IDFG prepared a report, General Wildlife Assessment; Thorncreek Road to Moscow Project (IDFG 2006), that evaluated species that could be affected by the proposed project. Although native habitat and wildlife have been severely altered in the project area, the Palouse remains home to many indigenous and introduced wildlife species – too many, for an inclusive impact analysis (IDFG 2006).

IDFG identified representative wildlife species that would provide an indication of impact for all species, but would also suggest suitable protections and mitigations for unavoidable impacts (IDFG 2006). The rationale for selecting wildlife species to evaluate is described in more detail Section 3.8.2 Methodology and in the General Wildlife Assessment (IDFG 2006). Through a filtering process, IDFG identified 32 species, including13 vertebrate and 19 invertebrate species that could reasonably be expected to be present in the project area and, therefore, potentially be impacted by the project. See Table 26. Representative Wildlife Species.

Table 26. Representative Wildlife Species

Common Name	Scientific Name
Woodhouse's toad	*Bufo woodhousii*
Mountain quail	*Oreortyx pictus*
Peregrine falcon	*Falco peregrines*
Townsend's big-eared bat	*Corynorhinus townsendii*
Nimapuna tigersnail	*Anguispira nimapuna*
Pale jumping-slug	*Hemphilla camelus*
Fir pinwheel	*Radiodiscus abietum*
Salmon coil	*Helicodiscus salmonaceus*
Lyre mantleslug	*Udosarx lyrata*
Oregonian	*Cryptomastix mullani tuckeri*
An Oregonian (Hells Canyon)	*Cryptomastix populi*
Humped coin	*Polygyrella*
Giant Palouse earthworm	*Driloleirus americanus*
Northern alligator lizard	*Elgaria coerulea*

Common Name	Scientific Name
Ring-necked snake	*Diadophis punctatus*
Swainson's hawk	*Buteo swainsoni*
Long-billed curlew	*Numenius americanus*
Short-eared owl	*Asio flammeus*
Grasshopper sparrow	*Ammodramus savannarum*
California myotis	*Myotis californicus*
A stonefly	*Capnia zukeli*
A stonefly	*Soyedina potteri*
A stonefly	*Capnia lineate*
A stonefly	*Perlomyia collaris*
A stonefly	*Taenionema umatilla*
A mayfly	*Paraleptophlebia traverae*
A mayfly	*Parameletus columbiae*
A spur-throat grasshopper	*Melanoplus digitifer*
A spur-throat grasshopper	*Melanoplus payettei*

Other Species Considered

Several other wildlife species were also considered. Federal candidate species are species for which USFWS or National Oceanic and Atmospheric Administration (NOAA) have sufficient information on biological vulnerability and threats to support a proposal to list it as threatened or endangered. However, candidate species are not yet listed, do not have protection under ESA and are precluded due to higher priorities. These federal candidate species are described below. Listed threatened and endangered species and critical habitat are described in Section 3.9, Threatened and Endangered Species.

Additional species that could potentially occur in the project area were of particular interest to agencies or the public included the long-eared myotis (*Myotis evotis*) and pygmy nuthatch (*Sitta pygmaea*). For these reasons a specific study was conducted regarding their occurrences and potential alternatives' impacts. Details regarding the wildlife species considered are described in detail in the Wildlife Technical Reports.

Long-eared myotis. Long-eared myotis is a small commonly occurring forest bat that ranges from British Columbia to Baja. In Idaho it is found in a wide range of habitats including grasslands, shrub-steppe habitat, forestland, forested riparian and wetland areas, and barren land with exposed rock (Gillies 2004). A bat survey conducted on portions of the Palouse Ranger District by the USFS and IDFG suggest that the long-eared myotis is likely to occur in the study area and may utilize pine stands for roosting (Melquist 2005b).

Pygmy nuthatch. Pygmy nuthatch is a tiny bird that ranges from British Columbia to Central Mexico. In Idaho, the pygmy nuthatch is generally limited in its distribution to the southern slope of mountains at elevations up to approximately 3,500 feet. Pygmy nuthatches require mature pine stands and snags for foraging and nesting. They are known to be sedentary and young birds may move an average of 286 meters (m) or 938 ft, but have been observed to move up to 533 m or 1,749 ft from their natal area (Ghalambor 2006). In 2005, pygmy nuthatches were observed in pine stands at the southern end of the study area (Melquist 2005b). Suitable habitat is limited along the project corridor but is available on Paradise Ridge and in other areas in Northern Idaho. Pine stands are described in Section 4.8 under Pine Stands.

Northern alligator lizard. Northern alligator lizard is a reptile that occurs from central California to southern British Columbia and east to Montana. Idaho populations occur in the Panhandle region from Boundary County south to northern Clearwater County; however, it is rarely encountered and poorly documented. It occurs in coniferous forests, often in clearings or along forest edges. Sites typically have a prominent understory with leaf litter, bark, rotting logs or talus. They are thought to consume a variety of arthropods and perhaps mollusks and earthworms. There are no known occurrences of northern alligator lizard in the project area; however the pine stand in the southern end of the study area may be considered suitable habitat (IDFG 2006).

Wolverine. Wolverine was listed as a federal candidate species under the Endangered Species Act in December of 2010. They occur within a wide variety of habitats, primarily boreal forests, tundra, and western mountains throughout Alaska and Canada. However, the southern portion of the range extends into Washington and the northern Rocky Mountains in Idaho, Montana, and Wyoming. Wolverines tend to live in remote and inhospitable places away from human populations. They naturally occur at low densities and are rarely and unpredictably encountered. Female wolverines use birthing dens excavated in deep snow. Persistent, stable snow greater than five feet deep appears to be a requirement for birthing dens, because it provides security for offspring and buffers cold winter temperatures.

Wolverines travel long distances over rough terrain and deep snow. The availability and distribution of food is likely the primary factor in determining wolverine movements and home range size; however, gender, age, and differences in habitat are also factors (USFWS 2010).

There are no documented occurrences of wolverine near the project area. The project area is primarily highly disturbed, cultivated, farmland without a persistent, deep snow pack. Therefore wolverine and its habitat have a low likelihood to be present in the project area.

Yellow-billed cuckoo. The Yellow-billed cuckoo was identified as a federal candidate species in Latah County in 2012 when the DEIS was published but was proposed as threatened in November 2014. However, the species was not proposed as threatened in Latah County nor is there proposed designated critical habitat in Latah County (USFWS 2015). The Yellow-billed cuckoo is also a State of Idaho Species of Special Concern. It prefers treed, riparian corridors with a heavy understory (Anderson and Laymon 1989). Dense understory is important for nest site selection and cottonwood trees are important for foraging habitat. Nesting pairs require large blocks of riparian habitat which do not occur in the project area (IDFG 2006).

Bumble bees. The western bumble bee (*Bombus occidentalis*) was common on the Palouse and throughout the western United States but populations have drastically declined (Cameron et al. 2011) including in the Palouse. A population was discovered in Pacific Northwest bunchgrass grassland, approximately 150 miles south of the project (Kimoto et al. 2012); therefore, it is possible that the Palouse Prairie remnants and forest communities support this species.

Bumble bees are important for plant conservation and biodiversity and their regional or local decline can impact plant communities (Biesmeijer et al. 2006; Vamosi et al. 2006). Native bees may pollenate agricultural crops and non-cultivated plants and forage on pollen to feed developing larvae (Michener 2007). Ten of the 15 species historically recorded from Whitman and Latah Counties, which represented most of the regional historically present species, were detected in a recent study of bumble bees, which included Paradise Ridge. (Hatten and Looney 2013).

Habitat loss and fragmentation, pesticide use and exposure to pathogens contribute to the decline of bees (Goulson et al. 2008; Cameron et al. 2011). Bumblebee community composition has changed and genetic diversity has been lost due to agriculture in tall grass prairie habitat in Illinois (Grixti et al. 2009; Lozier and Cameron 2009), but very little is known about the bumble bee communities associated with small, isolated habitat remnants such the Palouse Prairie. Bee communities in remnant habitats are influenced by numerous factors, including the composition and quality of the surrounding landscape or matrix habitat (Steffan-Dewenter and Tscharntke 1999; Steffan-Dewenter et al. 2002; Hines and Hendrix 2005; Hendrix et al. 2010). Bee diversity is correlated to floral diversity, density and matrix diversity (Steffan-Dewenter et al. 2002; Hines and Hendrix 2005).

Bumblebees can thrive in agricultural fields with flowering crops and nesting sites and some open grassland species are adept at utilizing agricultural lands (Diekotter et al. 2006). However, these likely provides limited resources for bees given its prevalence of non-pollen or nectar producing crops, suggesting that bumble bee persistence is due to weeds and native plants along

roads and crop margins and/or resources available within the remnants. Furthermore, diversity of flora is known to correlate with bumble bee diversity (Hendrix et al. 2010).

The golden northern bumblebee (*Bombus fervidus*), which is associated with agricultural lands, is thought to be the primary pollinator of Spalding's catchfly, a partially self-fertilizing species. However, Spalding's catchfly is also dependent upon pollinators for fruit development and seed set (Lesica 1993; Lesica and Heidel 1996).

Grassland Nesting Birds. The conversion of prairie to cropland has affected communities of birds and other wildlife that rely on grassland habitats. The Breeding Bird Survey, an annual bird count conducted by volunteer birders, has provided data for the past 30 years and shows evidence of declining populations of grassland birds, an important factor being the loss of suitable grassland-nesting habitat (Johnson 2000). The cropland that largely replaced prairie is avoided by many bird species, which cannot find the necessary habitat structure in cultivated fields. Most birds that do nest in cropland suffer reproductive failure because of frequent agricultural operations (Rodenhouse and Best 1983). Likewise, hayfields often are used by grassland birds, but mowing operations can be very detrimental to the birds and their nests (Bollinger et al. 1990, Frawley and Best 1991). Reproduction in both cultivated fields and hayfields are not likely to offset mortality and thereby maintain populations. (Johnson 2000). Grasslands established under the CRP program may mitigate some of the detrimental effects that have occurred to native grassland. Several studies have found CRP fields to be highly attractive to breeding grassland birds. The species that most commonly breed in CRP fields vary geographically (Johnson 2000).

Giant Palouse earthworm. The giant Palouse earthworm (*Driloleirus americanus*) is currently found in eastern Washington and Idaho and is poorly understood. In July 2009, USFWS received a petition requesting that the species be listed as threatened and that critical habitat be designated under the Endangered Species Act. On July 26, 2011, USFWS issued a 12-month finding on a Petition to List the Giant Palouse Earthworm [50 CFR Part 17] in which USFWS found that the listing was not warranted.

Early records by Smith in 1897 state that the worms were very abundant in the area (USFWS 2011). They live in deep, semi-permanent burrows, and move to the surface to feed on fresh plant litter (James 2000). Two earthworm occurrences were found on Paradise Ridge in 2012 and two worms, were found in the large ridge-top prairie on Paradise Ridge in 2010. One earthworm was found at Smoot Hill Ecological Preserve in Whitman County in a Palouse Prairie remnant in 2005. In 1986 or 1987, about five Palouse earthworms were found near Moscow. Around 1978 one Palouse earthworm was found near Moscow, and another at the top of the Lewiston Grade along US 95.

Survey efforts in Washington State in the eastern Cascades and the Palouse found earthworms in 18 of the 54 sites evaluated in 2011 suggesting that the earthworms are more widespread. In 2012, two of the additional 49 sites surveyed found earthworms, totaling 22 sites in Washington. The giant Palouse earthworm has been found in grasslands, Pine stands and Douglas-fir stands suggesting that it may occur in a wider variety of environments and soils than originally thought. The giant Palouse earthworm was not found in recent surveys conducted in agricultural and urban locations in Latah County, Idaho (Johnson-Maynard et al. 2007, Smetak et al. 2007,), and Whitman County, Washington (Fauci and Bezdicek, 2002).

Ungulates

Independent studies of big game or ungulate (i.e., moose, elk, and white-tail deer) effects were conducted by Dr. Wayne Melquist (Melquist 2005a) and Dr. Bill Ruediger (Ruediger 2007). Both studies concluded that the project area does not include critical big game habitat or known migration corridors.

White-tail deer. Compared to elk and moose, white-tail deer are less affected by human disturbances. They thrive in agricultural and forested areas that contain adequate amounts of woody cover and herbaceous forage (Demarais et al. 2000). White-tail deer need some structural cover adjacent to them in order to take full advantage of their foraging opportunities (Compton et al. 1988, Dusek et al. 1989, Vercauteren and Hygnstrom 1998). Because whitetails tend to occupy the lower elevations, unlike elk, they are not often forced to migrate in winter. Instead, they will concentrate in timber where snow is less deep (Melquist 2005a).

Moose. Moose prefer shrubby forests with nearby lakes, wetlands, and bogs. Moose diets consist primarily of woody regrowth (e.g., willow, aspen or fir) that follow disturbances such as fire, floods, and logging (Franzmann 2000). Moose commonly use open areas to feed on grasses, sedges, and forbs, then will retreat to the security of tall shrubs and forests to rest. They migrate primarily along or between riparian areas and wetlands (Crenshaw pers. comm. 2005). While random movements and dispersal by moose likely occur, the timing and direction of such movements are unpredictable (Melquist 2005a).

Elk. Elk rely heavily on forest cover and rugged terrain for avoiding human disturbances (Skovlin et al. 2002) and predators (Creel et al. 2005 and Kauffman et al. 2007). Elk movements in and around the project area are often dictated, in large part, by the location and distribution of agricultural crops. Although elk can thrive in non-forested regions, they rely on mature shrub communities and topography to provide adequate security cover (McCorquodale et al.1986, Sawyer et al. 2007).

Available Ungulate Habitat

Deer, elk and moose habitat should include four basic components: food, cover, water and space. The arrangement of these components in the project area can influence foraging behavior and movement. The categories that were used by Sawyer (Sawyer 2010) to rank the quality of habitat for target big game species are described below:

- Poor – does not provide basic habitat components and does not support big game in large numbers or on a year round basis
- Marginal – provides some basic habitat requirements but is limited in quantity and quality. Area is unable to support measureable numbers year-round or seasonally
- Moderate – provides reasonable habitat and has the potential to support big game on year-around or seasonal basis
- Excellent – provides an abundance of high-quality habitat and supports big game on a year-round or seasonal basis.

Table 27. Quality of Available Ungulate Habitat indicates the overall quality of habitat for each ungulate species in the western, central and eastern corridors. The topography and general habitat components utilized by ungulates are summarized below:

Table 27. Quality of Available Ungulate Habitat

	Habitat Quality		
Corridor	Moose	Elk	White-tail deer
Western	Poor	Poor	Marginal
Central	Poor	Poor	Marginal
Eastern	Marginal	Marginal	Moderate

Source: (Sawyer 2010)

Western Corridor

The western corridor is characterized by gentle to rolling topography. It is primarily cropped agricultural fields with sparse rural residences. It is used for seasonable foraging by ungulates. Small patches of suitable ungulate habitat are located in Washington State outside the project area (Melquist 2005a).

IDFG personnel have occasionally observed moose and elk in the general vicinity but there is no evidence that they utilize the western corridor on a regular basis. White-tail deer are believed to utilize the western corridor on a year-round basis (Sawyer 2010).

Central Corridor

The central corridor is characterized by rolling topography. It is also primarily agricultural fields with sparse rural residences. It has more development, as it is closer to the existing US-95 alignment.

IDFG personnel have observed moose and elk in the general vicinity, but there is no evidence that they utilize the central corridor on a regular basis. White-tail deer are believed to utilize the central corridor on a year-round basis (Sawyer 2010).

Eastern Corridor

The eastern corridor is characterized by rolling topography. It is also primarily agricultural fields but has more CRP enrolled land that may be utilized by ungulates compared to the western and central corridors. It also has several wooded draws and small ponds. Habitat exists near Tomer Butte north of Highway 8, east of the eastern corridor and Paradise Ridge.

IDFG personnel have observed moose and elk on Paradise Ridge, but the extent to which they use the area is unknown. Most big game abundance estimates are derived from aerial surveys, typically flown during the winter months while animals are congregated and more visible.

The project area has not been included in recent moose or deer surveys conducted by IDFG; however, in the past year four moose have been relocated by IDFG from the Moscow area. The area is part of a larger elk unit that is stratified into high, medium, and low-density strata and flown each year. However, survey emphasis is placed on the high and medium-density strata. Since the eastern corridor and Paradise Ridge are part of a low-density stratum (Crenshaw pers. comm. 2005) there is no elk abundance data specific to the eastern corridor.

The number of moose and elk that utilize Paradise Ridge is so low, and use is so unpredictable, that capturing an adequate sample of animals is considered by Sawyer to be infeasible (Sawyer 2010). IDFG has expressed that under suitable conditions it may be possible to survey and develop a population estimate for moose and elk in the project area (Henneky pers. comm. 2015). Nonetheless, the wilidfe technical reports and IDFG agree that moose and elk use is more likely to occur in the eastern corridor compared to the western and central corridors. White-tail deer utilize the eastern corridor on a year-round basis (Sawyer 2010).

Ungulate Movement

Varieties of habitat components are utilized by ungulates and may affect their movement in the project area. Paradise Ridge contains a mixture of tree stands, shrubs, grasslands and agricultural fields. Man-made ponds, patches of suitable habitat and forested draws are also located on the eastern side of the project area near Paradise Ridge. Although big game likely travel along the

wooded draws that extend west from Paradise Ridge, the draws do not connect Paradise Ridge with other patches of higher quality habitat to the west.

Based on the distribution of suitable cover and habitat, elk and moose could travel between Paradise Ridge, northeast towards Tomer Butte or southwest to the small patches of suitable habitat in Washington State. The closest cover in the Paradise Ridge area to the complex of habitat in Washington is a small pine stand located just north of Eid Road. Ungulates would likely utilize the small patches of trees or shrub habitat for cover while grazing in the agricultural fields nearby. Moose are expected to only have occasional random movement through these areas. Deer move in all directions to and from Paradise Ridge and the patches of Washington habitat during all times of the year (Melquist 2005a).

The project area is located in a low priority wildlife linkage area of US-95 identified by IDFG. The number of wildlife collisions in this linkage area was much less than other segments of US-95 or similar type highways (ITD 2013). See Section 3.10 Transportation for additional information regarding wildlife collision data and the Safety Technical Report for details.

Aquatic Species

Table 28. Fish Species Occurring in the South Fork Palouse River lists the fish species known to occur in the South Fork Palouse River. The only salmonid native to the Palouse River is an isolated population of West-slope cutthroat trout; however, it does not occur in the South Fork Palouse River. Idaho State Water Quality Standards do not distinguish between native and introduced salmonids for the designation and protection of salmonid spawning.

Table 28. Fish Species Occurring in the South Fork Palouse River

Common Name	Scientific Name	Status
Longnose dace	*Rhinichthys cataractae*	Native
Speckled dace	*Rhinichthys osculus*	Native
Redside shiner	*Richardsonius balteatus*	Native
Largescale sucker	*Catostomus macrocheilus*	Native
Bridgelip sucker	*Catostomus columbianus*	Native
Brook trout	*Salvelinus fontinalis*	Introduced
Brown trout	*Salmo trutta*	Introduced
Rainbow trout	*Oncorhynchus mykiss*	Introduced
Northern pike minnow	*Ptychocheilus oregonensis*	Introduced

Source: Palouse River Watershed Assessment and TMDLs, February 2007

3.9 Threatened and Endangered Species

3.9.1 Regulatory Framework and Policies

Threatened and endangered species are governed by the following:

- 16 USC 1531-1544-Endangered Species Act
- Magnuson-Stevens Fishery Conservation and Management Act (P.L. 104-297)

The ESA directs federal agencies to ensure that actions authorized, funded, or carried out by them are not likely to jeopardize the existence of any threatened or endangered species, or result in the destruction or modification of their critical habitat.

3.9.2 Methodology

A Biological Assessment (BA) was prepared for the proposed project in February 2007. The purpose of the BA was to analyze the potential effects of the proposed project on threatened, endangered, proposed, and candidate species and designated critical habitat. The BA was submitted to USFWS for review. USFWS concurrence was received on March 2007. The BA was reviewed again in November 2011 and resulted in a verification email from USFWS that the original effect determination is valid. A clarification to the proposed conservation measures outlined in the 2007 BA, and associated concurrence letters were provided in an email on April 2012.

In assessing potential effects to listed species, one of the following effects findings is required:

- "No effect" means there will be no effects, positive or negative, to listed or proposed resources. Generally, this means no listed resources will be exposed to the action and its environmental consequences.
- "May affect, but not likely to adversely affect" means that all effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact and include those effects that are undetectable, not measurable, or cannot be evaluated. Discountable effects are those extremely unlikely to occur.
- "May affect, and is likely to adversely affect" means that listed resources are likely to be exposed to the action or its environmental consequences and will respond in a negative manner to the exposure.

Since publication of the DEIS, the project area was resurveyed for rare plants including Spalding's catchfly. The survey methods and findings are documented in a memo titled: Memo Documenting Resurvey for Spalding's Catchfly along US-95 Thorncreek to Moscow Project

Area (Lichthardt 2014). The most recent USFWS species list was also reviewed in early 2015 but no new species were listed or proposed in the action area (USFWS 2015).

3.9.3 Existing Conditions

Table 29. Federally Listed Threatened and Endangered Species shows species listed as threatened or endangered and designated critical habitat in Latah County, Idaho according to USFWS and NOAA. Federal candidate species are described in Section 3.8 Vegetation, Fish and Wildlife. If the federal candidate species are listed before construction and the project could result in an effect to the species' the BA will be amended.

Table 29. Federally Listed Threatened and Endangered Species

Common Name	Scientific Name	Federal Status
Canada lynx	*Lynx canadensis*	Listed Threatened
Spalding's catchfly	*Silene spaldingii*	Listed Threatened
Water howellia	*Howellia aquatilis*	Listed Threatened
Steelhead trout	*Oncorhynchus mykiss*	Listed Threatened
Steelhead trout	*Oncorhynchus mykiss*	Designated Critical Habitat

Species descriptions and general habitat requirements are summarized below:

Canada lynx. The Canada lynx habitat occurs in older dense primarily coniferous/boreal forests with downed trees located above elevations of 4,000 feet. The lynx utilize primarily Engelmann spruce, subalpine fir, and lodgepole pine habitats. The lynx's population and distribution is highly dependent on the distribution of its primary food source, the snow shoe hare, and to a lesser degree, other small mammals and birds.

The project area is located on agricultural land less than 3,000 feet in elevation and is located greater than 20 miles from the nearest potential Lynx Analysis Unit (ITD 2005) (USFWS 2009).

Spalding's catchfly. Spalding's catchfly typically occurs in open native grasslands with minor shrub components occasionally with scattered conifers. The majority of the project area is agricultural land; however, there are CRP lands, grasslands, scattered ponderosa pine stands and Palouse remnants that offer potential habitat for Spalding's catchfly. The project area is also included as a key conservation area for Spalding's catchfly recovery and is the focus of numerous restoration projects including Spalding's catchfly establishment. See Section 3.8.3. Non-native annual grasses such as tall oatgrass and smooth brome are the largest threats to Spalding's catchfly populations.

The larger remnant portions of grassland are found along the south end of Paradise Ridge. Smaller remnant populations are scattered across the south end of the project. The project area was surveyed for Spalding's catchfly during the summer of 2005. No Spalding's catchfly plants were found. Two field visits were conducted in 2006, which resulted in the discovery of a Spalding's catchfly population on Clyde Hill between the Modified W-4 and C-3 alignments, but outside of the alignment footprints. The next closest known occurrences of the species are 8 miles from the project area in Genesee and 15 miles west of the project area near Colton, Washington (ITD 2005). USFWS and IDFG completed additional surveys from 2008 to 2010; however no new plants were identified in the project area (Hill 2011). After the DEIS was published, ITD also completed additional survey of the remnants in the project area and no new Spalding's catchfly plants were found (Lichthardt, 2014).

Water howellia. Water howellia occurs in wetlands within forested, channeled, scablands. It is mostly found in partly shaded vernal pools or shallow ponds that hold water into mid-summer but dry out by September. The only area where water howellia could potentially occur in the project area is the floodplain of the South Fork Palouse River. However, the floodplain is actively cultivated and the stream is channelized. It is dominated by reed canarygrass, a non-native invasive weed which does not provide suitable habitat. Therefore it is highly unlikely that water howellia is present (ITD 2005).

Steelhead Trout and Designated Critical Habitat. NOAA designated critical habitat for steelhead on November 30, 2004. Designated critical habitat included areas in Latah County. The nearest occupied habitat is within the Snake River Basin Steelhead Evolutionary Significant Unit. The Palouse Subbasin habitat was specifically excluded from the designated critical habitat in the final rule for the designation of Critical Habitat in the Federal Register [50 CFR Part 226] in 2005 (NOAA 2012).

3.10 Transportation

3.10.1 Regulatory Framework and Policies

Transportation is governed by the following:

- FHWA TA 6640.8A requires analysis of changes to travel patterns and accessibility, effects to highway and traffic safety for bicyclists and pedestrians, and overall public safety (FHWA 1987).

3.10.2 Methodology

Data on existing highway and roadway facilities were obtained from ITD, Latah County, the City of Moscow, and local highway districts. Information regarding transit was obtained by

interviewing the Moscow Valley Transit and Moscow Transportation Commission. Existing access information was gained from field observations, aerial photographs and review of transportation plans. In addition a technical report was developed to evaluate traffic operations and safety within the project corridor. The technical report is titled, US-95 Thorncreek Road to Moscow; AASHTO Highway Safety Manual Analysis for Alternatives Carried Forward (ITD 2012a).

The following reports were prepared or revised since the DEIS was published:

- *US-95 Thorncreek Road to Moscow; AASHTO Highway Safety Manual Analysis on Alternatives Carried Forward* (ITD 2013). The Safety Analysis that was developed for the DEIS was revised to include the predicted crash data on the existing US-95 loop and provided updated data.
- *Addendum 1 US-95 Thorncreek Road to Moscow AASHTO Highway Safety Manual Analysis on Alternatives Carried Forward. (ITD 2015b).* This is an addendum to the previous report (ITD 2013) which evaluates the Modified W-4 Alternative.
- *US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward* (ITD 2014a). This study was developed to respond to public comments regarding the significance of the difference in lengths, travel times and to evaluate road user costs.
- *Addendum 1 US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward. (ITD 2014b).* This is an addendum to the previous report which evaluates the Modified W-4 Alternative.
- *Weather Analysis and Climate Study for US Highway 95, Thorncreek Road to Moscow, Four Proposed Alternatives, No-Build, W-4, C-3 And E-2* (Qualls 2014). This report is a compilation and synthesis of several previous reports. It clarifies the methodology, data sets, meteorological principles and patterns, and presents additional information on snow accumulation and snowmelt. On-site measurements and variability across the study area were analyzed. Satellite remote sensing data from 2002 through 2012 documents the spatial distribution of snow. Additional data was provided to address comments on the short sampling duration in the original Weather Analysis. It describes the variability of weather related roadway conditions between the alternatives.

On-site measurements collected include:

- Instantaneous, and 24-hour maximum and minimum air temperature
- Relative humidity
- Average and gust wind speeds/directions
- Incoming shortwave radiation
- Precipitation type, rate and accumulation

- Snow depth
- Visibility distance

Wind speed/direction and incoming solar radiation on a horizontal plane were measured at 33 feet height; air temperature, relative humidity, precipitation, visibility distance, and snow depth were measured at approximately 6.5 feet in height. Wet bulb and dew point temperatures were calculated from the temperature and humidity data.

The original weather analysis included monthly and total precipitation from January through May 2005, reported as liquid water equivalent depths, at the three weather corridors and the PSF. Comparing current year PSF values to the 30-year normal shows that January and February were dry months, March and May were excessively wet months, and April was similar to the climatological norm so that the study period included a good sampling of precipitation across the range of historically observed climatological values.

There was a strong correlation between monthly precipitation at the PSF and at each of the three study corridors, which allowed an estimation of the monthly climatological normal precipitation at each of the three study sites.

It is common practice in scientific field studies to conduct short-term data collection, on the order of a few months, to determine spatial variability of weather characteristics (for example, the First International Satellite Land Surface Climatology Project (ISLSCP) Field Experiment (FIFE), (Hall and Sellers 1995) from which more than 1000 scientific publications were produced.

The five-month data set used in the DEIS Weather Analysis was not the sole source of weather data but is a valid methodology used to establish the relative conditions among the EC, WC and RH weather stations within their respective climate regimes. The smaller five-month data set was used to establish the relative ranking of the short-term data within the larger PSF data set, which is about a mile from the study area. Knowledge of the relative conditions among the three on-site weather stations and the UI weather station allowed estimation of the long-term climate at each of the on-site weather stations through calibration with the long-term UI climate records.

The relative weather conditions at the three stations behaved consistently with established principles of physics and thermodynamics, and compared to similar locations and/or elevation trends documented by scientific literature (Qualls 2014).

3.10.3 Existing Conditions

Within Idaho, US-95 is classified as a principal arterial, providing the only continuous north-south highway connection between the Idaho Panhandle and the rest of the state. It supports multiple local uses, including primary access to agricultural, residential, commercial and industrial land located directly adjacent to the highway. Within the City of Moscow, US-95 connects with SH-8, which is a major east west highway. Both US-95 and SH-8 serve as principal arterials within the local system and Regional Transportation System.

Safety

Crash data between 2003 and 2012 shows that this section of US-95 averages 25.3 crashes per year and would reach 27.4 crashes in the year 2017. Safety issues within the study area relate primarily to the road geometry and accesses onto the roadway. Table 30. Crash Severity Data and Table 31. Crash Data summarize the crash types and severity as well as contributing conditions (ITD 2013).

Table 30. Crash Severity Data

Year	Total	Fatal	Type A	Type B	Type C	PDO
2003	28	1	1	4	5	17
2004	21	0	1	4	3	13
2005	22	0	1	3	4	14
2006	14	1	3	2	1	7
2007	33	0	4	7	7	15
2008	26	0	3	2	5	16
2009	22	0	0	3	2	17
2010	26	1	2	5	6	12
2011	14	2	0	0	1	11
2012	47	0	3	4	10	30
Total	253	5	18	34	44	152

Type A - Incapacitating injury but no fatality such as a spinal injury
Type B - Evident injury that is non-incapacitating such as a minor injury like a broken arm
Type C - Possible injury that is not obvious at the scene
PDO-Property damage only with no injury.

Table 31. Crash Data

Year	Wildlife	Intersection related*	Head-ons	Negotiating a curve	Inclement Weather or Road Conditions
2003	3	4	0	19	18
2004	3	2	0	4	14
2005	4	4	0	5	9
2006	1	1	1	5	6

Year	Wildlife	Intersection related*	Head-ons	Negotiating a curve	Inclement Weather or Road Conditions
2007	3	5	2	13	19
2008	3	2	0	9	14
2009	6	1	1	11	12
2010	4	3	3	12	18
2011	2	0	0	6	13
2012	3	4	1	16	27
Total	32	26	8	100	150

*Crashes occurred either at/in an intersection.

The crashes that have occurred on the existing alignment over the past 10 years appear to be random in nature and include head-on crashes, sideswipes, rear end turning, overturning, run off the road to the ditch and embankment, among other crash types.

Twenty-six crashes occurred due to access issues. These accidents occurred either at an intersection, because of an intersection or at a private access point. Accidents at intersections tend to have a higher severity than accidents outside of intersections. Ten percent of these intersection-related crashes are rated as Type A for severity. Approximately 40 percent of these intersection related crashes occurred at private approaches (ITD 2013).

There were eight head-on collisions, which generally had the highest severity rating of all types of accidents. These types of accidents are generally associated with passing maneuvers. By adding a lane in each direction and separating the direction of travel, the frequency of these accidents will be greatly reduced (ITD 2013).

The National Highway Traffic Safety study on the cost of crashes shows that society generally pays for 75 percent of crash costs. Economic values for crashes in the project area have been calculated by crash severity. Fatal accidents in the project area cost approximately $6,200,000 whereas property damage only crashes cost approximately $6,700 per crash in 2012 (ITD 2013).

Three HALs are located within the project limits based on information presented in the DEIS. See Table 32. High Accident Locations (HALs). These segments have the highest crash rates in ITD District 2 and are in the top 13 highest crash locations in the State of Idaho. The crash rates in these locations and throughout the corridor are expected to increase as traffic volumes increase (ITD 2012a).

Table 32. High Accident Locations (HALs)

Milepost Location on US-95	HAL Ranking in Idaho
337.67 - 338.17	6
338.67 - 339.62	13
340.62 - 341.12	4

Accidents near MP 339.1 and MP 344.0 are primarily caused by failure to negotiate the existing curves. Most of these accidents can be attributed to curves in the project area that have substandard geometry and narrower than standard shoulders. Between 2003 and 2012 approximately 40 percent of the accidents in the project area occurred while a driver was negotiating a curve.

Since the DEIS was published, the crash data was updated and the HALs were recalculated. Two HALs are located within the project limits based on the updated crash data. See Table 33. Updated High Accident Locations (HALs). These segments have the highest crash rates in ITD District 2 and are in the top 50 highest accident locations in the State of Idaho. The crash rates in these locations and throughout the corridor are expected to increase as traffic volumes increase (ITD 2013).

Table 33. Updated High Accident Locations (HALs)

Milepost Location on US-95	HAL Ranking in Idaho
337.67 - 338.17	17
340.62 - 341.12	34

IDFG identified four locations as ungulate crossing areas in Latah County through their Fish and Wildlife Linkage Area Project (Geodata 2008). US-95 Thorncreek to Moscow between MP 340 and 343.3 was identified as a low priority linkage area. The frequency of wild animal crashes in the project area is much less than many other sections of US-95 and many other highways in Idaho (Ruediger and DiGiorgio 2007). See Table 34. Crashes by Ungulate Crossing Areas in Latah Countyfor a comparison between different US-95 segments identified by IDFG as Wildlife Linkage Areas in Latah County between 2003 and the end of 2012.

Table 34. Crashes by Ungulate Crossing Areas in Latah County

Ungulate Crossing Area on US-95	Total Wild Animal * Crashes	Linkage Priority Status
Marsh Hill (MP 367.1 -370.1)	27	Moderate
Crooks Hill (MP 356.0 – 359.0)	19	Low
Steakhouse Hill (MP 349.7-352.7)	47	Moderate
Thorncreek to Moscow (MP 340 -343.3)	17	Low

* Wildlife Crashes and Wild Animal Crashes refer to primarily big game such as elk, moose and deer. Not all wildlife such as birds, amphibians, and small mammals are counted.

Crash data from 2003 thru 2012 indicated that there were 476 wildlife crashes along US-95 in District 2. There have been 32 wild animal crashes on US-95 within the project limits during that period. Seventeen occurred within the identified Thorncreek to Moscow ungulate crossing area. Of these only six were rated as type C (possible injuries). The rest of the crashes involving wildlife were property damage only (ITD 2013). Based on the low severity and randomness of the wildlife crashes, they are not anticipated to be a primary factor in the evaluation of the alternatives (ITD 2013).

Intersection related crashes are mostly multiple vehicle high severity crashes that involve head-on crashes, sideswipes, angle turning, and rear-ending crashes. Of the intersection related crashes reported in the past 10 years between Thorncreek Road and Moscow to characterize existing conditions, 19 total injuries that were a combination of serious injuries (Type A), visible injuries (Type B), and possible injuries (Type C) were reported (ITD 2013). The ITD's Strategic Highway Safety Plan has 11 emphasis areas, one of which is intersection crashes; however, there is no emphasis area for wild animal crashes due to their low severity (ITD 2010). However, ITD is currently working with IDFG and wildlife resource agencies to identify the highest priority wildlife crossing area for statewide prioritization within the State of Idaho.

Highway Capacity and Operations

Capacity, the ability of a road to accommodate traffic volume, is an important component of mobility (ITD 2014a). When traffic volumes increase and the roadways reaches capacity, the LOS may be affected.

With the existing Average ADT of 5,364, the current facility operates at a LOS-C, which is high-density traffic flow. Approximately six percent of the vehicle traffic is commercial and 94 percent is estimated to be passenger vehicles. At LOS C, speed and freedom to maneuver are severely restricted and the driver experiences a generally poor level of comfort and convenience.

Time spent following slower vehicles is noticeably longer and occurs more frequently. With LOS C, there are few gaps in traffic to allow for passing, increasing overall delay.

The existing roadway consists of two 12-foot undivided travel lanes with two-foot shoulders. The clear zone and shoulder width, which are important elements for safety, vary throughout the corridor and do not meet AASHTO standards[17]. This two-lane segment of US-95 is a bottleneck for the four-lane highway segments at the northern and southern ends of the project.

Access

This stretch of US-95 is designated as Statewide Access Control. There are currently 66 at-grade intersections and approaches (public, commercial and field) in this 6.34-mile segment of US-95. Between 2003 and 2012 there were 26 crashes directly associated with private approaches or intersections (ITD 2013).

The north end of the project is the most densely populated area. It has the highest number of access points and the highest number of intersection related crashes. Currently, the many approaches along the existing alignment do not meet the ITD Access Control Policy due to spacing, sight distance, width and grade of approaches, which contribute to intersection related conflicts. The Latah County Comprehensive Plan requires that limits should be placed on the number of access points to state and federal highways (Latah County 2010).

Mobility and User Cost

Mobility refers to the efficiency and speed that motorist travel from one location to another and is defined by the AASHTO Policy on Geometric Design of Highways and Streets as "trip travel time". Capacity is an important component of mobility.

The total travel time for motorists making the entire trip on existing US-95 from Thorncreek Road to Moscow in 2017 would be 380,000 hours with a total cost of travel time, cost of time related vehicle depreciation, and vehicle operating costs of $14,600,000 (ITD 2014a).

Increased mobility reduces road user costs and is expected to improve economic opportunity according to the 2011 ITD Strategic Plan. See the Mobility and Road User Cost Technical Report (2014a) for additional Information.

[17] AASHTO standards are outlined in the Roadside Design Guide 2011 (4th Edition)

Bicyclists and Pedestrians

The existing US-95 travels primarily through an agricultural area and there are no formal bicycle and pedestrian facilities along the highway corridor. Currently bicyclists and pedestrians must use the shoulders, which vary, through the corridor. The shoulders are not striped to accommodate dedicated bicycle or pedestrian paths.

Mass Transit

There is currently no mass transit available in the study area; however, there is mass transit available in the City of Moscow. While service ends approximately a half-mile north of the project limits, consideration of future service extension is possible. Moscow Valley Transit had bus routes between Moscow and Lewiston; however, the service was discontinued in 2010 due to low ridership and lack of funding. The City of Moscow operates a small vanpool between Moscow and Lewiston. Palouse Rideshare, an on-line carpooling match program, is available for commuters travelling the same routes on a regular basis.

Weather Conditions

During meetings held from 2004 to 2006, and during the DEIS public comment period, weather conditions as they affect safety were a major topic of concern. The public expressed concern that the topographic differences between locations of the different alternatives could influence safety differently. A report titled Final Report for Weather Analysis of Proposed Realignments of U.S. Highway 95; Thorncreek Road to Moscow (Qualls 2005) was prepared.

During the DEIS comment period, the public expressed concern about the weather data set, the influence of elevation on temperature, ice, and snow. There were also comments regarding fog, wind, snowdrift and other weather related road conditions. The Weather Analysis was revised after the DEIS hearing and additional information, clarification and additional data was incorporated into this section.

General Climate of the Region. Northern Idaho, including Moscow, Idaho and surrounding areas, has a maritime, dry-summer climate (Abramovich et al, 1998). The existing US-95 alignment from Thorncreek Road to Moscow and all of the proposed alternatives are subject to this climate. There is a lengthy history of climate information available as a reference for the region, such as data from the PSF located approximately one mile from the study area. The PSF has weather data extending back to 1892 (Qualls 2014).

Associated with the general climate of the region, the study area can be expected to experience precipitation, snow, ice, wind and fog. Approximately 60 percent of crashes during the past 10 years occurred during inclement weather where the police reports list snow, rain, or fog as the weather condition during the crash incident.

The weather analyses divided the project area into three distinct weather corridors: a western corridor, eastern corridor and Reisenauer Hill. These do not specifically correspond to the individual alternatives (E-2, C-3, and Modified W-4 alternatives); however, based on the principles of physics and thermodynamics, the Modified W-4 Alternative was most closely represented by the western corridor, and the E-2 and C-3 Alternatives were best represented by the eastern corridor. The southern two fifths of the study area for all the alternatives were best represented by Reisenauer Hill. Wind, snow, precipitation, ice, and fog were evaluated to determine if there were differences in conditions between the corridors as summarized in this section.

Wind. Analysis of the data reported in the weather analysis showed the eastern corridor and western corridor to have wind speeds similar to each other, and Reisenauer Hill to experience faster wind speeds than either of the other two corridors. The predominant airflow in the region is in the east-west direction. Given the extent of Paradise Ridge, the northern two-thirds of the study area was dominated by flow over Paradise Ridge, and the southern third of the study region generally experienced air flow which moved around the southern end of Paradise Ridge.

Fog. Fog or clouds are formed when the temperature of the air decreases enough that atmospheric water vapor reaches the saturation point, causing condensation of vapor into fine liquid water droplets. This can happen because temperature decreases or by increasing atmospheric humidity. Multiple measurements were collected each minute, and these were reported as samples, averages or accumulations, depending on the variable, several times per hour.

Measurements of visibility distances associated with fog at the eastern corridor, the western corridor, and Reisenauer Hill showed Reisenauer Hill to have the poorest visibility conditions, followed by the eastern corridor and then the western corridor. There were fewer hours of dense fog in the lowland areas but the worst fog in the study area was located in the southern project area south of Eid Road.

Precipitation and Snow. Snow accumulation is primarily a function of the amount of precipitation and the air temperature while precipitation is falling. Precipitation, especially as snow, is of significant interest in this project in terms of its impact on driving safety for each of the roadway alignment alternatives. Regionally, precipitation decreases on a gradient from Moscow south to the top of the Lewiston grade. Countering this is the localized topography of Paradise Ridge and the fact that precipitation generally increases with elevation on the upwind side of a slope.

Measurements during the study regularly showed the air temperature in the western corridor as 10 to 15 degrees Fahrenheit less than the air temperature in the eastern corridor. The study showed that the eastern corridor was freezing four percent more than the western corridor; however, it was more common for all the corridors to be freezing at the same time. The data regarding snow accumulations showed that snow melts off most slowly from steep north-facing slopes and most quickly from steep south-facing slopes, with gradual variation between these extremes.

Precipitation studies showed that precipitation in the eastern corridor was the greatest and was approximately 25 percent more than the western corridor and near Reisenauer Hill. Annual precipitation at the eastern corridor and Reisenauer Hill weather stations are similar to the PSF and average 2.5 inches per year lower at the western corridor weather station. Due to the short horizontal distance in the upwind direction from the peak of Paradise Ridge to the valley floor, much of the precipitation lands and accumulates downwind of the ridgeline to the south and east of Reisenauer Hill and Paradise Ridge.

Data from the Revised Weather Analysis shows snow accumulation to be less further north of Reisenauer Hill. Both the on-site weather station measurements and the satellite images in the technical report provide useful information comparing snow accumulation between alternatives. Reisenauer Hill is the most critical location within the study area, including both the north-facing slope on the north end and the region to the south toward Thorncreek Road, due to greater accumulation and retention of snow compared to the rest of the study area.

Exhibit 23. Snow Cover shows an eastward looking view of the eastern corridor from Zeitler Road showing the contrast between either flat or south-facing slopes or slopes with a north-facing aspect. The snow covered slopes face northwest. Since the photographs were taken before 10 a.m., the sun was still to the east, so that northwestern slopes had not yet been exposed to direct solar radiation. Flat and south-facing slopes both in the low-lying foreground and at higher elevations in the background are free of snow.

Exhibit 23. Snow Cover



Ice. Icy road conditions may result from condensation on road surfaces during freezing conditions. Reisenauer Hill had the highest total number of hours with frost conditions, followed closely by the western corridor. The southern portion of the study area has the most severe frost conditions. The eastern corridor would both have less than half the number of hours with frost conditions than Reisenauer Hill and the western corridor. See the Revised Weather Analysis (Qualls 2014) for more detail.

3.11 Visual Quality

3.11.1 Regulatory Framework and Policies

Visual quality is governed by the following:

- 23 USC-131 Control of Outdoor Advertising
- 23 USC-136 Control of Junkyards
- 23 CFR-750-Highway Beautification Act
- FHWA's visual quality assessment methodology
- Context Sensitive Solutions (CSS)
- TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents

3.11.2 Methodology

A technical report titled U.S.-95 Thorncreek Road to Moscow Project Final Visual Resources Report (December 2005) was prepared and documents the methods and findings of the visual quality analysis. The purpose of the visual analysis is to assess the existing visual resources of the project corridor and to identify and describe positive and negative visual effects that may occur for each of the alternatives.

Investigators completed site visits, reviewed aerial photographs and developed a three-dimensional (3-D) virtual model that was used at public meetings. The analysis consisted of two phases: an inventory and an assessment of data. During the inventory, investigators identified key observation viewpoints, assessed project visibility, variety classes and distance zones. See Table 35. Visual Variety Classifications. During the second phase, data was analyzed to determine the potential effects of each alternative to visual resources. See the Visual Resources Technical Report.

Table 35. Visual Variety Classifications

Variety Classification	Description
Class A	These are areas where features of landform, vegetation patterns, and rock formations are outstanding within the study area. These features are typically unique and dominate the landscape.
Class B	These are areas where features contain variety in form, line, color, and texture or combinations of these. These features tend to be common throughout the study area.
Class C	These are typically areas with minimal variety in form, line, color, and texture or areas that have been substantially altered by human presence. These areas are typically associated with urban areas such as the City of Moscow.

Distance zones were established because visual perception of form, texture, color, and other visual criteria change as distance from a viewpoint increases. There are four thresholds:

- Extreme Foreground (0 to 0.25 mile)
- Foreground (0.25 miles to 0.5 mile)
- Middle ground (0.5 to 1 mile)
- Background (1 to 3 miles)

After areas were delineated according to project visibility, variety class, and distance zone, the visual effects from different features of the alignments were evaluated.

Additional visual assessment was completed as part of the DEIS Community Impact Assessment Technical Report (HDR 2006). This report also provides design visualizations towards and from several angles and positions including views from the City of Moscow towards the highway.

3.11.3 Existing Conditions

The rolling hills of the Palouse and small farms characterize much of the landscape. Paradise Ridge, a prominent feature, is located outside of the study area further to the east. Dense urban areas associated with the City of Moscow are located to the north.

Key observation viewpoints where viewers who are most sensitive to visual change or where viewers believed to have a high concern for visual change were most likely to be found, were identified. The two key observation viewpoints for this project were identified as residential and recreation viewpoints.

Residential viewers included urban dwellers found in and around the City of Moscow and rural dwellers associated with outlying areas and farms. Recreation viewpoints are typically associated with parks, golf courses, trails and scenic overlooks. Viewers at these viewpoints are concerned with visual impacts because these impacts influence their perception of the recreation experience. Several parks considered as recreation viewpoints are:

- Frontier Park
- Paradise Ridge Road (bicycling and hiking)
- University of Idaho Golf Course
- University of Idaho Arboretum

See Exhibit 19. Points of Interest. See the Visual Resources Technical Report for additional information.

Information from the photogrammetric review, 3-D virtual model, and site visits were used to delineate areas into three variety classes; A, B, and C as described below:

A. The upper portions of Paradise Ridge were the only areas delineated as Class A. The high diversity in landform, vegetation, and uniqueness to the study area contributed to this classification.
B. The rolling hills of the Palouse farmland and the lower slopes of Paradise Ridge were classified as B. While common to the Palouse country, these areas exhibit variety in color, texture, and landform.
C. The urban areas associated with the City of Moscow were classified as C. These areas are heavily altered, dominated by structures, roads, and other man-made amenities.

3.12 Traffic Noise

3.12.1 Regulatory Framework and Policies

Traffic noise is governed by the following:

- 23 CFR 772-Procedures for Abatement of Highway Traffic Noise and Construction Noise
- ITD Traffic Noise Policy

TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents 23 CFR 772 Procedures for the Abatement of Highway Traffic and Construction Noise outlines the FHWA noise regulations. It contains the criteria used for establishing noise impacts and mitigating those impacts.

FHWA and ITD require a traffic noise analysis of federally funded projects or federal aid highway projects that construct new highways or reconstruct existing highways if the project would significantly change either the horizontal or vertical alignment or increase the number of through-traffic lanes.

The FHWA has established NAC standards for several categories of land use activities. See Table 36. FHWA Noise Abatement Criteria (NAC). A traffic noise impact occurs when the existing or future noise levels approach (1 dBA below the FHWA NAC) or exceed the FHWA Noise Abatement Criteria (NAC) or when the predicted future traffic noise levels substantially exceed the existing noise levels, even if the predicted noise levels may not approach or exceed the FHWA NAC.

Table 36. FHWA Noise Abatement Criteria (NAC)

Activity Category	Leq (dBA) FHWA	Evaluation Location	Description of Activity Category
Category A	57	Exterior	Land on which serenity and quiet are of extraordinary significance and serve an important need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose
Category B	67	Exterior	Residential
Category C	67	Exterior	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings

Activity Category	Leq (dBA) FHWA	Evaluation Location	Description of Activity Category
Category D	52	Interior	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios
Category E	72	--	Hotels, motels, offices, restaurants/bars, and other developed lands, properties or activities not included in A-D or F
Category F	--	--	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical), and warehousing
Category G	--	--	Undeveloped lands that are not permitted
Substantial Increase	15	--	A substantial increase of 15 dBA over the existing noise levels

Source: 23 CFR 772 and ITD Traffic Noise Policy

3.12.2 Methodology

Noise is defined as unwanted sound. There are several different ways to measure noise, depending on the source of the noise, the receptor, and the reason for the noise measurement. Noise in these analyses was measured in terms of sound pressure levels expressed in A-weighted decibels (dBA). Noise levels stated in terms of dBA reflect the response of the human ear by filtering out some of the noise in the low and high frequency ranges that the ear does not detect well.

A technical report titled Analysis of Noise and Impacts US-95 Thorncreek Road to Moscow was prepared in 2012 to evaluate the existing noise conditions and to determine if the alternatives, including the No Action Alternative, would result in noise impacts meeting or approaching the FHWA Noise Abatement Impact Criteria (NAC). An addendum to the 2012 Noise Analysis was prepared to evaluate the noise impacts of the Modified W-4 Alternative. Both of these reports were updated in 2015 to reflect revised impacts and potential impacts due to the project right-of-way.

The noise analysis was performed in accordance with 23 CFR 772 and the ITD Traffic Noise Policy dated May 2011. Field measurements were taken and a computer noise analysis was performed using the FHWA Traffic Noise Model (TNM) 2.5. The model was used to predict noise impacts to sensitive receptors in the project area in 2010 and the design year of 2037 for all of the alternatives.

Vehicle speeds were 60 mph for the existing roadway and 65 mph for the No Action and Action Alternatives. The posted speed limits change to 35 mph or 45 mph at the approach to Moscow, depending on the alternative. Traffic volume input that was used in the TNM model was divided into road segments as shown in Table 37. TNM Model Traffic Volume Inputs.

Table 37. TNM Model Traffic Volume Inputs

T horncreek Road to End of New Alignment		
–	2010 ADT	2037 ADT
Cars	4,621 (94.3%)	7,223 (92.5%)
Medium Trucks	83 (1.7%)	164 (2.1%)
Heavy Trucks	196 (4.0%)	422 (5.4%)
–	2010 DHV	2037 DHV
Cars	534 (94.3%)	835 (92.5%)
Medium Trucks	10 (1.7%)	15 (2.1%)
Heavy Trucks	23 (4.0%)	35 (5.4%)
End New Alignment To Eid Road	–	–
–	2010 ADT	2037 ADT
Cars	4,621 (94.3%)	7,235 (92.5%)
Medium Trucks	83 (1.7%)	164 (2.1%)
Heavy Trucks	196 (4.0%)	422 (5.4%)
–	2010 DHV	2037 DHV
Cars	534 (94.3%)	836 (92.5%)
Medium Trucks	10 (1.7%)	15 (2.1%)
Heavy Trucks	23 (4.0%)	35 (5.4%)
Eid Road To Clyde Road	–	–
–	2010 ADT	2037 ADT
Cars	4,998 (94.3%)	7,804 (92.5%)
Medium Trucks	90 (1.7%)	177 (2.1%)
Heavy Trucks	212 (4.0%)	456 (5.4%)
–	2010 DHV	2037 DHV
Cars	576 (94.3%)	900 (92.5%)
Medium Trucks	10 (1.7%)	16 (2.1%)
Heavy Trucks	25 (4.0%)	38 (5.4%)

Clyde Road To Palouse River Road	–	–
–	2010 ADT	2037 ADT
5,640 (91.7%)	6,129 (94.3%)	9,454 (92.5%)
148 (2.4%)	111 (1.7%)	215 (2.1%)
362 (5.9%)	260 (4.0%)	552 (5.4%)
2017 DHV	2010 DHV	2037 DHV
660 (94.3%)	700 (94.3%)	1,083 (92.5%)
12 (1.7%)	12 (1.7%)	20 (2.1%)
28 (4.0%)	30 (4.0%)	46 (5.4%)

Source: Idaho Transportation Department 2012a

3.12.3 Existing Conditions

The results of the FHWA TNM 2.5 computer model analysis for existing conditions are shown in Table 38. Existing Noise Levels. The results of the FHWA TNM 2.5 analysis indicated that currently seven receptors approach or exceed the FHWA NAC, indicated by the bolded receptors in Table 38. Existing Noise Levels. Noise Receptor Locations are shown in Exhibit 24. Noise Receptor Locations. See the Traffic Noise Technical Report for additional detail.

Table 38. Existing Noise Levels

Receptor No.	Receptor Location	NAC Activity Category	Distance to Centerline (feet)	Existing Leq dBA
1	3336 US-95	B	146	59.3
2	3335 US-95	B	227	55.6
3	3379 US-95	B	154	58.9
4	3455 US-95	B	167	57.9
5	3460 US-95	B	235	55.2
6	1010 Eid Rd	B	193	58.9
7	1071 Eid Rd #3	B	2474	37.2
8	1071 Eid Rd, #5	B	2543	37.3
9	1071 Eid Rd, #7	B	2593	37.2
10	1071 Eid Rd, #9	B	2732	37.1
11	1071 Eid Rd, #8	B	2799	36.9
12	1071 Eid Rd, #2	B	2692	36.9
13	1084 Eid Rd	B	2595	36.8
14	3621 US-95	B	5349	58.2
15	3625 US-95	B	273	55.4
16	1005 Zeitler Rd	B	158	58.4
17	Undeveloped	G	5334	34.5

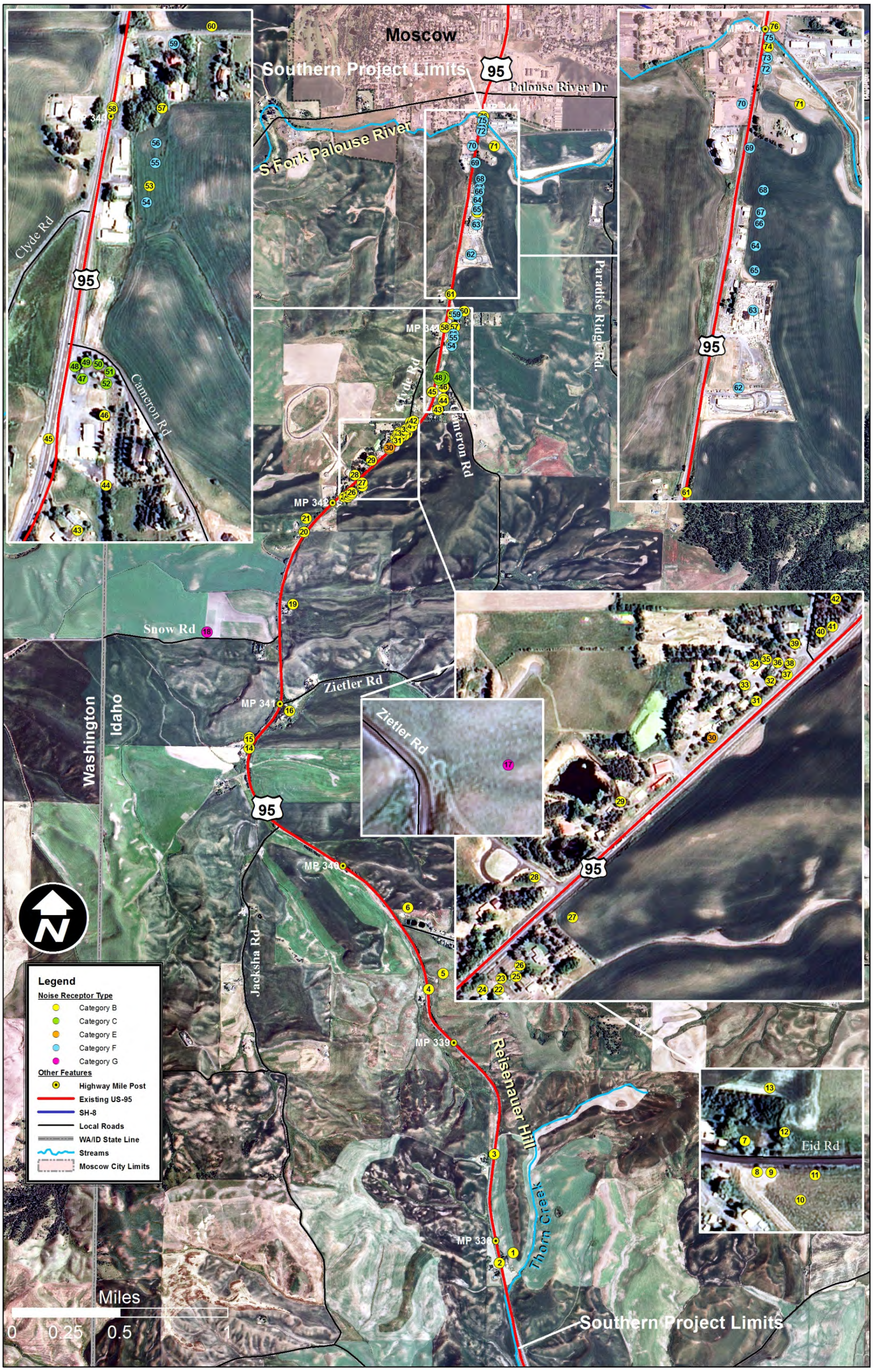
Receptor No.	Receptor Location	NAC Activity Category	Distance to Centerline (feet)	Existing Leq dBA
18	Undeveloped	G	1975	38.9
19	3672 US 95	B	142	60.1
20	3693 US-95	B	114	61.8
21	3125 US-95	B	254	54.5
22	3096 US-95	B	115	61.5
23	3094 US-95	B	90	63.7
24	**3098 US-95**	**B**	**63**	**67.1**
25	3082 US-95	B	127	60.7
26	3080 US-95	B	103	62.5
27	3060 US-95	B	103	62.6
28	3055 US-95	B	161	58.7
29	3045 US-95	B	151	59.4
30	3015 US-95	E	80	65.8
31	**2979 US-95, #22**	**B**	**71**	**66.7**
32	2979 US-95, #23	B	96	63.7
33	2979 US-95, #20	B	165	59.1
34	2979 US-95, #21	B	208	57.1
35	2979 US-95, #24	B	201	57.3
36	2979 US-95, #26	B	148	60.2
37	**2979 US-95, #25**	**B**	**69**	**67.0**
38	2979 US-95, #03	B	99	63.8
39	2979 US-95, #05	B	151	59.8
40	2979 US-95, #02	B	110	62.8
41	2979 US-95, #01	B	106	63.2
42	2949 Clyde Rd	B	177	58.5
43	2946 US-95	B	129	62.3
44	2936 US-95	B	164	59.6
45	2940 US-95	B	177	59.2
46	**2922 US-95**	**B**	**64**	**67.7**
47	**2921 Cameron Rd***	**C**	**68**	**67.1**
48	**2921 Cameron Rd***	**C**	**68**	**67.2**
49	**2921 Cameron Rd***	**C**	**68**	**67.4**
50	2921 Cameron Rd*	C	171	59.2
51	2921 Cameron Rd*	C	171	59.2
52	2921 Cameron Rd*	C	171	59.0
53	2880 US-95	B	79	65.5
54	2880 US-95	F	79	64.4

Receptor No.	Receptor Location	NAC Activity Category	Distance to Centerline (feet)	Existing Leq dBA
55	2860 US-95	F	90	64.4
56	2850 US-95	F	80	65.9
57	2848 US-95	B	80	65.8
58	2845 US-95	B	157	59.8
59	2820 US-95	F	82	65.3
60	2822 US-95	B	145	55.7
61	2805 US-95	B	149	60.4
62	2740 US-95	F	166	59.0
63	2726 US 95	F	179	58.5
64	2720 US 95	F	98	64.0
65	2710 US 95	F	122	61.6
66	2670 US 95	F	95	64.4
67	2650 US 95	F	89	64.8
68	2650 US 95	F	63	66.1
69	2551 US 95	F	121	62.2
70	2555 US 95	F	268	54.8
71	2500 US 95	B	264	54.5
72	2305 US 95	F	105	63.2
73	2205 US 95	F	110	62.8
74	2205 US 95	B	118	61.4
75	2113 US 95	F	122	59.6
76	2113 US 95	B	126	56.2

Note: Bolded numbers indicate that the noise level approaches or exceeds FHWA NACs.

*Green Acres RV Park stalls (Receptors 47-52) are counted as one business.

Exhibit 24. Noise Receptor Locations



3.13 Air Quality

3.13.1 Regulatory Framework and Policies

- 40 CFR 51-Requirements for Preparation, Adoption, and Submittal of Implementation Plans
- 40 CFR 93-EPA Standards; Control of Hazardous Air Pollutants from Mobile Sources
- 42 USC 7401-Clean Air Act (CAA) of 1970 and amendments of 1990
- ITD Air Quality Policy
- FHWA guidance on Mobile Source Air Toxic (MSAT) Analysis in NEPA documents
- IDAPA 58.01.01-Idaho State Administrative Procedures
- FHWA Policies to Reduce Greenhouse Gas Emissions Associated with Freight Movements
- FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents

CAA amendments of 1990 established air quality goals including those related to land use, travel mode choice, and reduction in vehicle miles traveled. The CAA amendments regulate projects in non-attainment and maintenance of National Ambient Air Quality Standards (NAAQS) requiring conformance with the State Implementation Plan.

Greenhouse gas (GHG), and specifically Carbon dioxide (CO2) emissions, are not currently regulated at the federal or state level. However, FHWA is working nationally with other modal administrations through the USDOT Center for Climate Change and Environmental Forecasting to develop strategies to reduce the transportation sector's contribution to greenhouse gases, particularly CO2 emissions, and to assess the risks to transportation systems and services from climate change.

3.13.2 Methodology

MSAT standards establish stringent controls on gasoline, passenger vehicles, and gasoline containment to further reduce emissions of benzene and other MSATs. While MSAT releases to the environment may cause some level of pollution, scientific techniques, tools, and data analysis has not been developed to accurately estimate actual human health or environmental effects from MSATs from this transportation project (ITD 2007b).

In order to evaluate the projected emissions and MSAT effects, a qualitative analysis was performed. Transportation-related emissions can be related to VMT. This qualitative analysis utilizes existing and projected traffic volumes, vehicle mixes and vehicle miles to calculate vehicle miles travelled (VMT). VMTs are used to estimate the changes and relative differences

in MSATs for the project alternatives. GHG emissions, including CO2, are shown to be directly related to energy consumed.

3.13.3 Existing Conditions

The project is not within a federally designated air quality non-attainment or maintenance area for carbon monoxide (CO) and/or particulate matter (PM10 or PM2.5), nor is it within an IDEQ air quality area of concern. No project level air quality concerns were identified that required evaluation and the project has minimal likelihood of exceeding federal air quality standards. An air quality conformity analysis is not required; however, a qualitative analysis of air quality was conducted. Sensitive receptors in the study area include schools, daycare facilities, hospitals, parks, and retirement facilities.

Greenhouse Gas (GHG)

The transportation sector is the second largest source of total GHGs in the US and is the greatest source of carbon dioxide (CO2) emissions, a predominant GHG. In 2004, the transportation sector was responsible for about 31 percent of US CO2 emissions. The principal human-made source of CO2 emissions is the combustion of fossil fuels, which accounts for approximately 80 percent of human-made emissions of carbon worldwide. Almost all (98 percent) of transportation-sector emissions result from the consumption of petroleum products such as gasoline, diesel fuel, and aviation fuel (FHWA 2011).

Transportation related emissions, including CO2 can be correlated to VMT and fuel consumption, which is discussed in Section 3.15, Energy. The VMT for the existing US-95 is 34,008. VMT was calculated by multiplying the length of the alignment (6.34 miles) by the 2010 traffic volumes. The 2010 data was compiled in 2011.

3.14 Hazardous Materials

3.14.1 Regulatory Framework and Policies

Hazardous materials are governed by the following:

- 40 CFR 1500-1508-CEQ Regulations
- FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents
- 42 USC 103-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- 42 USC 6901-6992k -Resource Conservation and Recovery Act (RCRA)
- 33 USC Section 1251-Clean Water Act
- 40 CFR 61(M)-National Emission Standards for Hazardous Air Pollutants (NESHAP)

- 29 USC 651-Occupational Safety and Health Act (OSHA)
- 42 USC 300(f)-Safe Drinking Water Act
- 15 USC 2601-2629-Toxic Substances Control Act (TSCA)
- Idaho Statutes Title 39 Health and Safety
- Hazardous Waste Management Act (Chapter 44)
- Hazardous Substance Emergency Response Act (Chapter 71)
- Land Remediation Act
- Idaho Rules\Regulations\Standards (Chapter 72)
- IDAPA 37.03.09-Well Construction Standards Rules
- Rules and Minimum Standards for the Construction and Use of Injection Wells
- IDAPA 37.03.03 Rules and Minimum Standards for the Construction and Use of Injection Wells
- IDAPA 58.01.05-Rules and Standards for Hazardous Waste
- IDAPA 58.01.07-Rules Regulating UST Systems
- IDAPA 58.01.15-Rules Governing the Cleaning of Septic Tanks
- IDAPA 58.01.18-Land Remediation Rules
- IDAPA 58.01.11-Ground Water Quality Rules
- IDAPA 58.01.02-Water Quality Standards
- IDAPA 17.10.01-General Safety and Health Standards
- IDAPA 17.10.01-Idaho General Safety and Health Standards
- Lead-based Paint Poisoning Prevention Act of 1971
- Residential Lead-based Paint Hazard Reduction Act of 1992

3.14.2 Methodology

A technical report titled Hazardous Material Scan-US-95 Thorncreek Road to Moscow (Northwind 2005) was prepared to identify hazardous material risks in the study area. Federal and state databases were reviewed again in 2011 to identify any changes to known sites within one half-mile of each alternative that could be affected.

A survey for recorded and potentially hazardous materials was performed in 2005 within approximately one-half mile from the project area. Locations within the project area that potentially contained hazardous material were identified and marked on aerial photographs. Databases were reviewed and public safety personnel were interviewed. In addition, a field review of the study area was completed. The following sources were investigated to complete a hazardous materials scan of the study area:

National Response Center Public Report Database

- Latah County Solid Waste Department personnel interviews
- DEQ and ITD Lewiston personnel interviews regarding previous spills or releases
- Aerial photography
- Field survey of the corridor
- Idaho State Police Community and Drug Information.
- DEQ underground storage tank (UST) and leaking underground storage tank (LUST) database
- EPA database for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Superfund sites and RCRA sites water dischargers, hazardous waste sites, toxic releases and air emissions sites
- Idaho State Police website for Region 2 was accessed to identify known hazardous materials sites, such as methamphetamine (meth) labs or meth production by-products dump sites
- FINDS, ALLSITES databases

3.14.3 Existing Conditions

The predominant hazardous materials observed during the field survey were small propane tanks and aboveground storage tanks (ASTs) for petroleum products. Two sites were identified that have recorded USTs and two sites appear to have USTs but were not recorded in the databases. A fifth site is listed in the EPA database but was closed in 1988. Table 39. Hazardous Material Sites lists the sites identified within and near the project area. Also see Exhibit 43. Hazardous Material Site Effects.

Table 39. Hazardous Material Sites

Site Name	Address	Database/ Listing	Description
Johnson Trucking	4212 Cameron Rd.	FINDS	USTs and ASTs
Widmans Sports Center	1906 S. Main St.	ID Allsites	300 gallon gas UST. Closed 1988.
Moscow MTCE Yard (B21200)	709 W. Palouse River Dr.	ID Allsites	–
Primeland Cooperative/ Latah County Grain Growers	4169 US-95 South	ID UST	5 USTs (diesel & petroleum). Currently in use.
CHS Inc. DBA Primeland Cooperative	2555 US-95 South	ID Tier 2	280,000 pounds diesel fuel.
Private	1451 Thorncreek Rd.	NA	1 200-gallon propane tank.

Site Name	Address	Database/ Listing	Description
Thorncreek Ranch	1461 Thorncreek Rd.	Unlisted	Possible UST (Petroleum) Gas pump on property. Old AST (petroleum) located in equipment storage area.
Private	4347 Wolf Rd.	Unlisted	2 200-gallon ASTs (Petroleum).
Clifford Wolf Farms	1010 Wolf Rd.	–	–
Moscow	Unlisted	1 AST; 3 diesel & 1 gas tank inside barn. (petroleum)	–
Alan Hoffman	1511 Thorncreek Rd. Moscow	Unlisted	Multiple ASTs associated with farm use. Possible UST (old gas pump observed on property). 1 200-gallon propane tank.
Daniel and Dana Carter	1255 Broenneke Rd.	Unlisted	1 200-gallon propane tank.
Weber Land Company	6782 SR 195, Uniontown, WA	Unlisted	1 AST-across road in farmed field.
Private	Residence on Broenneke Rd	Unlisted	2 ASTs; 1 300-gallon tank. (petroleum and propane).
Joyce Frei Family Trust	Residence on Broenneke Rd	Unlisted	2 ASTs and 1 300-gallon tank (petroleum and propane).
Roy and Catherine Reisenauer	3460 US-95	Unlisted	1 200-gallon propane tank.

Four sites were observed or recorded to contain USTs. Two UST sites were recorded on the DEQ UST list; Primeland Cooperative and Johnson's Trucking. Two other sites appeared to have USTs with visible gas pumps that may still be connected to USTs but were not listed by DEQ. Two of these sites were located on Thorncreek Road on the southern end of the study area. The other site was located on US-95 and probably contains one tank used for diesel fuel.

Other fuel storage containers noted in the study area are described below:

- There was an abandoned 1,000-gallon tank observed along Jacksha Road. It currently holds water from a spring. Four locations in the project area had 55-gallon drums on the property with unknown contents.
- Seventeen properties were observed with ASTs and assumed to contain petroleum products such as gasoline, heating oil, or diesel fuel. The majority of the ASTs were approximately 200 to 500 gallons tanks. Thirty-four homes were observed to have an aboveground propane tank on the property. These ranged in size from 200 gallon to 500-gallon tanks.

- Three sites had numerous abandoned cars. One location on US-95 is currently used as an automotive repair shop. These sites have the potential for the presence of petroleum products, stained soils, and leaky car batteries, which could contaminate soils or water. One business within the project area services air conditioners and is anticipated to have Freon and other gases that pose a risk to the environment if not handled correctly. This location also included a stockpile of railroad ties, which are typically a source of leaking creosote.
- There were two locations along US-95 within the study area that had methamphetamine lab related incidences (ISP 2005). Methamphetamine labs contain hazardous materials; therefore, it will be necessary to verify what level of cleanup has been completed prior to any construction activities (Denbleyder, pers. com. 2005).
- Latah County has a solid waste transfer station located on SH-8, approximately five miles east of Moscow, outside the study area.

Lead-based paints and a variety of asbestos containing products were commonly utilized in construction between the 1940s and the mid-1970s. Lead-based paint was determined to be a hazardous material in the early 1970s. The vast majority of homes built before 1950 contained substantial amounts of lead-based paint. Due to the age of many of the existing structures there is the potential risk of lead-based paint and asbestos contained in the structures that would be demolished by each alternative.

3.15 Energy

3.15.1 Regulatory Framework and Policies

Energy is governed by the following:

- 40 CFR 1502-Council on Environmental Quality NEPA Regulation
- FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents

3.15.2 Methodology

Energy requirements of a highway include the energy required to construct, operate, and maintain the highway. The operational energy consumption has been estimated using the average energy consumption for different vehicle types (heavy trucks and passenger vehicles) and the VMT. VMT is estimated by multiplying the ADT by the length of the highway segment.

Maintenance energy can also be estimated based on the VMT because the amount of roadway that needs to be maintained and the amount of traffic using the roadway relates to the frequency which maintenance would be needed.

3.15.3 Existing Conditions

Operational energy

Table 40. Existing and Projected Fuel Use shows the estimated fuel used for vehicle types travelling on the existing 6.34-mile long highway segment.

Table 40. Existing and Projected Fuel Use

Vehicle type	Average Fuel Consumption (mpg)	Estimated Daily Fuel Use 2010 (gal)	Estimated Daily Fuel Use 2037 (gal)
Passenger Vehicle	22.2	1,445	2,252
Heavy Truck	5.9	329	687
Total Energy Use	–	1,773	2,939

The fuel consumption estimates used in this analysis are based on averages for fuel economy and do not take into account smoothness of traffic flow or average speeds traveled on a specific highway. Highly congested travel conditions with stop-and-start traffic, low speeds, and highly variable speeds all contribute to poor fuel economy (TRB 1995). To help measure the level of congestion or smoothness of traffic flow on a road, LOS standards have been developed. See Exhibit 8. Level of Services (LOS) for a graphic description of LOS.

Total fuel consumption for this segment of US-95 is estimated to be 1,773 gallons per day.

Maintenance energy

The vehicles and equipment used to maintain the highway include trucks, mowers, snow removal machines, tractors, and construction equipment. The frequency at which these vehicles are needed for maintenance activities and the energy needed to produce the material for the road maintenance can be correlated to the VMT for the roadway. VMT would reflect the traffic volumes, the amount of roadway to be maintained and the associated degradation.

4 ENVIRONMENTAL CONSEQUENCES

The primary resource effects from the four alternatives are summarized in Table 41. Summary of Resource Effects. Details are discussed in the respective sections below and in the applicable technical reports.

Table 41. Summary of Resource Effects

Resources	Alternatives			
	No Action	Modified W-4	C-3	E-2
Length (miles)	6.34	6.65	5.94	5.85
Predicted Crashes (total crashes 2017 through 2036)	642.5	244.9	260.2	213.9
Access Points	66	36	47	22
Residential Impacts	0	3	2	7
Additional Potential Residential Impacts	0	2	5	6
Business Impacts	0	0	0	0
Additional Potential Business Impacts	0	0	8	0
Environmental Justice	No disproportionate impact	No disproportionate impact	No disproportionate impact	No disproportionate impact
Right-of-Way new/existing/total (acres)	0	206/45/251	154 / 55 / 209	207 / 22 / 229
Prime Farmland (acres)	0	49.7	25	50.8
Cultural/Section 4(f) resource Use	0/0	0/0	0/0	0/0
Air Quality	Attainment Area	Attainment Area	Attainment Area	Attainment Area
Wetlands (acres)	0	1.85	0.99	3.61
Tributaries Number of Crossings/(Linear Feet)	0	10/3,592	5/7,808	5/2,592
Impervious Surface (acres) New alignment/New alignment plus remaining Old US-95 Loop	0/21	58/68	49/58	55/72
Floodplains (acres)	0	1.6	1.8	0
Pine Stand (acres)	0	0	0	3.9
Ungulate - (Deer, Elk & Moose) Population effects/ Effects to identified Ungulate Impact Area* (acres)	No Population Effect / none	No Population Effect / none	No Population Effect / none	No Population Effect / 4.4

Resources	Alternatives			
	No Action	Modified W-4	C-3	E-2
Palouse remnants within 1 km (3280 ft.)	0	12	14	24 including Paradise Ridge
Threatened and Endangered Species Effects	No Effect	Not Likely to Adversely Affect	Not Likely to Adversely Affect	Not Likely to Adversely Affect
Hazardous Material Sites	(1 Potential Cleanup)	(1 Potential Cleanup)	(1 Potential Cleanup)	(1 Potential Cleanup)
Noise Impacted Receptors**	9	No noise impacted receptors would remain after construction	No noise impacted receptors would remain after construction	1 noise impacted receptor would remain after construction
Visual Quality	No Impact	Low = 11% Mod = 58% Mod high = 23% High = 8% Mh + H = 31%	Low = 9% Mod = 68% Mod high = 15% High = 8% Mh + H = 23%	Low = 3% Mod = 47% Mod high = 25% High = 25% Mh + H = 50%
Construction/Total Cost-(million dollars) ***	Minimal	52/62	43/58	46/55

* Identified Ungulate Impact Area, which contains agricultural fields with nearby draws, small drainages, ponds, and cover as described in Melquist 2005a.

** Noise impacted receptors that would be removed due to right-of-way acquisition are not included in these numbers.

***The estimated construction costs includes excavation, rock ballast, plant mix, structures, traffic control and illumination. It excludes engineering, construction engineering, mitigation and right-of-way.

4.1 Socio-economic and Environmental Justice Effects

4.1.1 Social Effects

Each of the alternative's effects including property impacts, right-of-way needs, community cohesion, visual and noise effects were evaluated. Visual quality and noise effects are evaluated in Section 4.11 Visual Quality Effects and 4.12, Noise Effects. Community opinions regarding the effects of each alternative on the community, including noise and visual effects are detailed in the Community Impact Technical Reports. There were strong differing opinions regarding the effects of the W-4 and E-2 alternatives presented during the July 2006 interview period. The Citizens for a Safe Highway 95, claiming to represent people collectively owning 80 percent of the land along E-2, were in favor of E-2 due to the "spectacular view" of the Palouse and of the City of Moscow from US-95 as the route traverses the west base of Paradise Ridge. They believed that the beauty of Paradise Ridge could transform the highway into a gateway for Moscow, and that E-2 could promote and preserve the Palouse landscape to a scenic highway status.

The Paradise Ridge Defense Coalition, which opposed the E-2 Alternative, stated that the majority of the community would like to see the expansion of the roadway follow the existing route as much as possible to minimize the ecological footprint of new roadwork and the view towards US-95 from Paradise Ridge. The argument against E-2 centered on Paradise Ridge as a unique and valued feature in the community. To those opposed to E-2, the ridge should remain untouched because it provides aesthetic value. Paradise Ridge serves as a reason both for and against the E-2 Alternative (HDR 2005a).

Potential Property Impacts

Table 42. Residential and Right-of-Way Impacts shows the numbers of residences impacted and right-of-way needs by alternative.

Table 42. Residential and Right-of-Way Impacts

Alternative	Residential Impacts	Additional Potential Residential Impacts	New Right-of-Way (acres)	Existing Right-of-Way (acres)	Total Right-of-Way (acres)
No Action	0	0	0	0	0
Modified W-4	3	2	206	45	251
C-3	2	5	154	55	209
E-2	7	6	207	22	229

Residential impacts may be due to direct impacts to structures and homes, removal of access, or right-of-way acquisition that would substantially impair the property. If during right-of-way acquisition, displacement is required then displacements would be compensated under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Relocation Act). The Uniform Relocation Act established minimum standards for federally funded projects that require the acquisition of real property or displace persons from their homes, businesses, or farms. See Appendix 5. Uniform Relocation Act Summary.

The DEIS was based on a conceptual level of detail without the design, topographic, survey and geotechnical data, needed to accurately determine specific displacements. The displacements listed in the DEIS were based on a worst-case scenario where access impacts and close proximity to the alignments were assumed to result in displacement. After the DEIS hearing, displacement numbers were reviewed, specific assumptions were defined, and impacts were recalculated based on the assumptions.

It was assumed that "impacted" residences (and businesses) would be directly impacted by the cut and fill lines resulting in relocation, whereas "potentially impacted" residents (and businesses) would be near the cut and fill lines and right-of-way or outbuildings could possibly

be impacted but relocation of primary buildings or residences was not assumed. However, more detailed design or topographic information is needed to make that determination. If an action alternative is selected and the project is forwarded for design, then additional topographic, survey and design detail will allow ITD to accurately determine the right-of-way needs and the specific residential and business impacts. Impacts to those properties may be further minimized at that time. Table 42. Residential and Right-of-Way Impacts shows residential impacts and potential residential impacts by alternative. Proximity impacts including visual and noise impacts are discussed in Section 4.11 Visual Quality Effects, 4.12 Noise Effect and Section 6.1 Indirect Effects.

No Action Alternative

The No Action Alternative would not impact or potentially impact residences or require right-of-way acquisition.

Modified W-4

Modified W-4 would impact three residences. Two additional residences may be potentially impacted due to proximity. If the Modified W-4 Alternative is selected then during the design period when topographic, geotechnical and design detail is available, impacts may be further minimized. The potentially impacted residences would require that right-of-way be purchased but residential relocation is not assumed. Access would be consistent with the Expressway Access Control and ITD's Access Control Policy. Modified W-4 would require the greatest amount of right-of-way, but it would have fewer residential impacts and potential impacts than the E-2 Alternative.

C-3

C-3 would impact two residences and potentially impact five additional residences. If the C-3 Alternative is selected then during the design period when topographic, geotechnical and design detail is available, impacts may be further minimized. The C-3 Alternative would have the fewest direct impacts to residences of the Action Alternatives. The six RV stalls that are potentially impacted are not considered residences because use is temporary. They are considered as one business impact.

E-2 (Preferred Alternative)

E-2 would impact seven residences; five of which are located in the Benson Mobile Home Park. Approximately 2.9 acres of the mobile home park would be acquired. The E-2 Alternative would also potentially impact six additional residential stuctures, including a shop and garage which would not likely result in full displacements.

Community Cohesion

Based on an assessment of the important community resources and interviews with community members during the Community Impact Assessment, none of the alternatives would cause a major disruption to community cohesion. See Exhibit 19. Points of Interest.

No community resources would be more difficult to reach or become over utilized. Regardless of the alternative chosen, the origins and destinations of most travelers would remain similar to existing conditions. Residents located on existing US-95 would still be able to use the existing US-95 loop but traffic volumes would be reduced 95 to 97 percent compared to existing conditions. Some backtracking may be necessary at the northern end of the project to reach businesses on existing US-95; however, it would be offset by a reduction in waiting time to enter the highway. All of the Action Alternatives would provide sidewalks and shoulders that would improve community cohesion in the northern end of the project.

4.1.2 Economic Effects

The majority of the businesses located in the study area are in the northern project limits near Moscow. The existing commercial development south of Palouse River Drive is comprised of a mix of construction, transportation, fabrication, and specialty retail establishments (e.g., building supplier, hair salon). These are businesses that do not typically rely heavily on high traffic volumes and drive up customers.

The No Action, Modified W-4 and E-2 alternatives would have no right-of-way impacts or potential impacts to businesses. The C-3 Alternative has businesses located along it and eight would be potentially impacted by the road widening; a cabinet shop, RV park, Singar Inc. and some home based businesses. Visibility and access to some existing businesses could change as a result of the Modified W-4 and E-2 Alternatives in the current US-95 corridor south of Moscow for regional traffic because the Modified W-4 and E-2 Alternatives would be realigned. This could adversely affect businesses, particularly the retail businesses that rely, at least in part, on traffic passing through the area. However, the remaining US-95 loop may be turned over to the NLHD and used for local circulation, therefore businesses could still be visible but to a smaller volume of motorists. See Table 43. Business Effects.

Table 43. Business Effects

Alternative	Business Impacts	Additional Businesses Potentially impacted
No Action	-	-
Modified W-4	0	0
C-3	0	8
E-2	0	0

The indirect effects of the alternatives on businesses are discussed in Chapter 6, Indirect and Cumulative Effects.

The majority of the right-of-way required for each of the alternatives is agricultural land. The effects to farmland production are summarized in Section 4.3, Farmland Effects. The Uniform Relocation Act also provides compensation and equitable treatment for acquisition of agricultural land.

4.1.3 Environmental Justice Effects

Minority Populations

While there are minorities in the study area there are no distinguishable minority populations. Therefore, none of the alternatives would result in a disproportionately high or adverse effect to minority populations.

Low-Income Populations

There are three mobile home parks identified within the study area that may provide a source of low-cost housing: the Hidden Village Mobile Home Park, the Benson Mobile Home Park and the Woodland Heights Mobile Home Court. The residents living in the mobile home parks and court are not considered low-income populations. See Environmental Justice Technical Report (HDR 2005b) for details of the analysis.

All of the alternatives would benefit park residents by improving the safety of US-95 and improving highway access and mobility. Construction of additional travel lanes would improve the roadway's level of service, reducing commute times and facilitating more efficient access to services. Ingress and egress of vehicles, including emergency response units, would be enhanced by the use of a turn bay.

No Action Alternative

The No Action Alternative would not adversely affect the mobile home parks through residential impacts or right-of-way acquisition; however as traffic increases by the 2037 design year, the safety and capacity issues would intensify and community safety and traffic noise would increase. See Section 4.12 Traffic Noise Effects.

Modified W-4

Modified W-4 would avoid all of the mobile home parks. One manufactured home would be impacted but it is not located within a mobile home park. Modified W-4 would benefit all park residents by improving the safety of US-95 and highway access issues. Based on the above

discussion, Modified W-4 would not cause disproportionately high and adverse effects to any low-income populations as per EO 12898.

C-3

C-3 would closely follow existing US-95 near the Hidden Village and Benson Mobile Home parks. It would impact two residences located in the Hidden Village Mobile Home Park. Two acres of right-of-way would be required from the Hidden Village Mobile Home Park. C-3 would not cause disproportionately high and adverse effects to any low-income populations per EO 12898.

E-2 (Preferred Alternative)

E-2 would result in the greatest number of impacts to the mobile home parks. It would affect the eastern edge of Benson Mobile Home Park, impacting five residences and potentially impacting five additional residences. The residences are configured linearly from east to west along Eid Road. The E-2 Alternative was aligned to the far east of the mobile home parks to minimize harm and maintain community cohesion for the remaining residences.

E-2 would require acquisition of 2.9 acres of the Benson Mobile Home Park. It would include constructing a bridge structure over Eid Road, which would result in a substantial increase in noise effects to seven receptors (residences); however six of these residences are assumed to be impacted due to right-of-way acquisition and only one noise impacted receptor would remain after construction. The bridge structure and new, elevated roadway would cause high visual effects. See Section 4.11 Visual Effects and Section 4.12, Traffic Noise Effects for additional detail.

Hidden Village and Benson Park residents would still be able to use existing US-95 with similar access as existing conditions but with about 95 to 97 percent less traffic. Access to the new US-95 would be approximately one mile south of Eid Road.

Shifting the E-2 Alignment further west to minimize impacts in the Benson Mobile Home Park was evaluated in the E-1 Alternative but would result in different impacts and other resource effects. Impacts to this mobile home park could not be totally avoided. It would adversely affect the community cohesion for the remaining residents. The E-1 Alternative that was evaluated early in the screening process was aligned across Eid Road and between Hidden Village and Benson Mobile Home parks formally differentiating the development into the two respective parks. This alignment would more directly affect Hidden Village, requiring the relocation of three residences and was not desirable to the business owner. E-1 was eliminated because it would impact four residences and one business. One of the impacts was a NRHP listed historic

site and a Section 4(f) resource. It would also directly affect two rare plant communities and would have greater wetland effects. See Chapter 2, Alternatives for additional detail.

Based on interviews with the mobile home park owner and some residents in 2004 and 2011, most of the residents of the mobile home parks do not have major concerns should it be necessary to relocate. A property management company representative with several rentals in the area stated that there are other opportunities available for displaced residents to find equitable living accommodations; however, not all of the residents feel they would be able to find equitable replacement housing as expressed during the DEIS comment period. All relocations will be completed in accordance with the Uniform Relocation Act, which will ensure fair and equitable treatment and relocation into safe and secure housing.

The residents in the mobile home park are not considered to be minority or low-income populations and there would be no disproportionately high and adverse effects to low-income or minority populations as defined by EO 12898 (HDR 2005a).

4.2 Land Use and Recreation Effects

The alternatives would have differing effects to existing and proposed land uses. However, all Action Alternatives would be consistent with city and county land use plans and regulations. The proposed action alternatives would intersect the existing US-95 alignment just south of Moscow, near the area where the proposed Ring Road alignments are proposed. The E-2 and W-4 alternatives would pose more challenges associated with connectivity of the proposed Ring Road alignments than the C-3 Alternative but none would conflict with or preclude construction of the Ring Road project. ITD will work closely with the City of Moscow to ensure that the design of any of the action alternatives is consistent with and does not preclude construction of the Ring Road concept regardless of which alternative is selected. The county will enforce the current zoning and land use designations regardless of which alternative is chosen. All Action Alternatives would have Expressway Access Control that would restrict new accesses as described in FEIS Sections 2.4.2, 4.10 and Table 76. General Responses to Issues under Access.

All of the Action Alternatives would involve coordination with the City of Moscow, Latah County and university officials to identify scenic turnout locations and potential signage for the University of Idaho and Paradise Ridge. All of the Action Alternatives would also include lane striping to accommodate bicycles and pedestrians along the roadway.

No Action Alternative

The No Action Alternative would not require property acquisition and there would be no changes to land use. However, the No Action would not address safety and capacity issues in the

corridor. Accesses onto the highway would not be limited and would continue to grow. Therefore, the No Action would be inconsistent with the Latah County and City of Moscow Comprehensive Plans.

Modified W-4

Modified W-4 would convert more highly productive farmland to other uses, which is inconsistent with Latah County's primary land use goal of preserving productive farmland. To promote an efficient and safe transportation system, the Latah County Comprehensive Plan requires that limits be placed on the number of access points to the highway and encourages bicycle, pedestrian, and mass-transit options. All alternatives would maintain access to Paradise Ridge and other recreational resources. However, the accesses to different resources on existing US-95 would differ. Modified W-4 would have Expressway Access Control similar to the other Action Alternatives but would have a shorter center turn lane section than C-3, with more right in and right out turning movements which is less desirable for development. However, due to its location further west closer to planned development, development pressures are expected to be higher than the E-2 Alternative; however the Expressway Access Control will be enforced.

C-3

C-3 is viewed by the City of Moscow as the most consistent with land use goals because the areas along the existing US-95 are already established. However, it would have a longer five-lane section with a center turn lane with more access points. The longer center turn lane could have greater development pressure; however, the Expressway Access Control will be enforced. See the comment letter from the City of Moscow (City of Moscow 2014). The C-3 Alternative could increase property values along its alignment; however, it would be to a lesser degree than W-4. C-3 would present the least challenge for connectivity to the planned Ring Road Project.

E-2 (Preferred Alternative)

E-2 would affect the same types of land use categories as the other alternatives; but would affect more CRP land than other alternatives. It could increase property values and could have growth along its alignment. E-2 would have a shorter center turn lane section than C-3, with more right-in and right-out turning movements, which is less desirable for development.

4.3 Farmland Effects

E-2 is expected to have less development pressure than Modified W-4 because it is located further from planned development to the west and existing development along the center corridor. E-2 would be consistent with the City of Moscow goals for development and planned development west of US 95. However, it would have Expressway Access Control similar to the other action alternatives, which will be enforced.

All of the Action Alternatives would affect both prime farmlands and farmlands of statewide importance. See Exhibit 25. Farmland Effects and
Table 44. Farmland Effects for the acreage effects to farmland classifications as a result of each alternative.

Exhibit 25. Farmland Effects

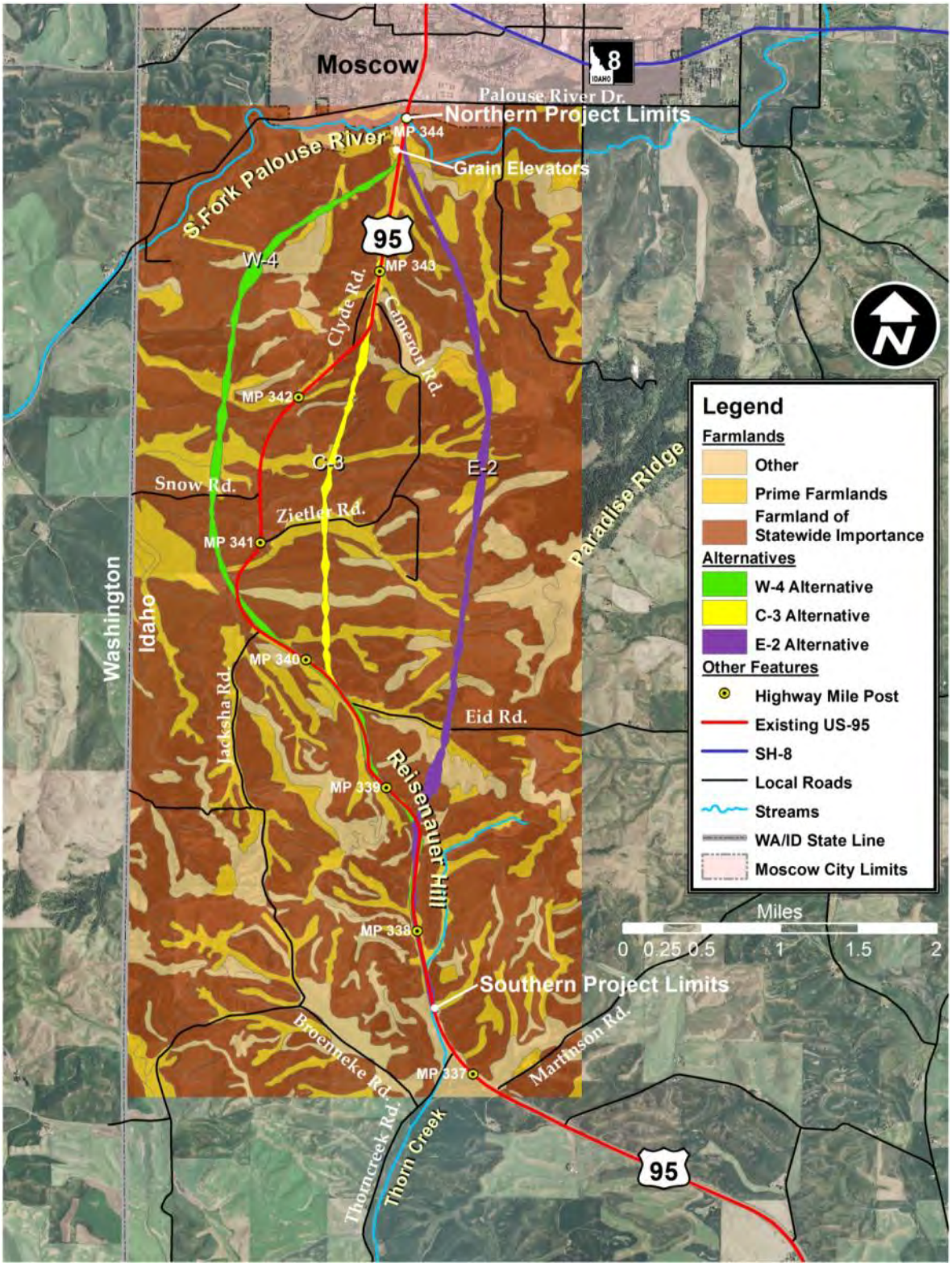


Table 44. Farmland Effects

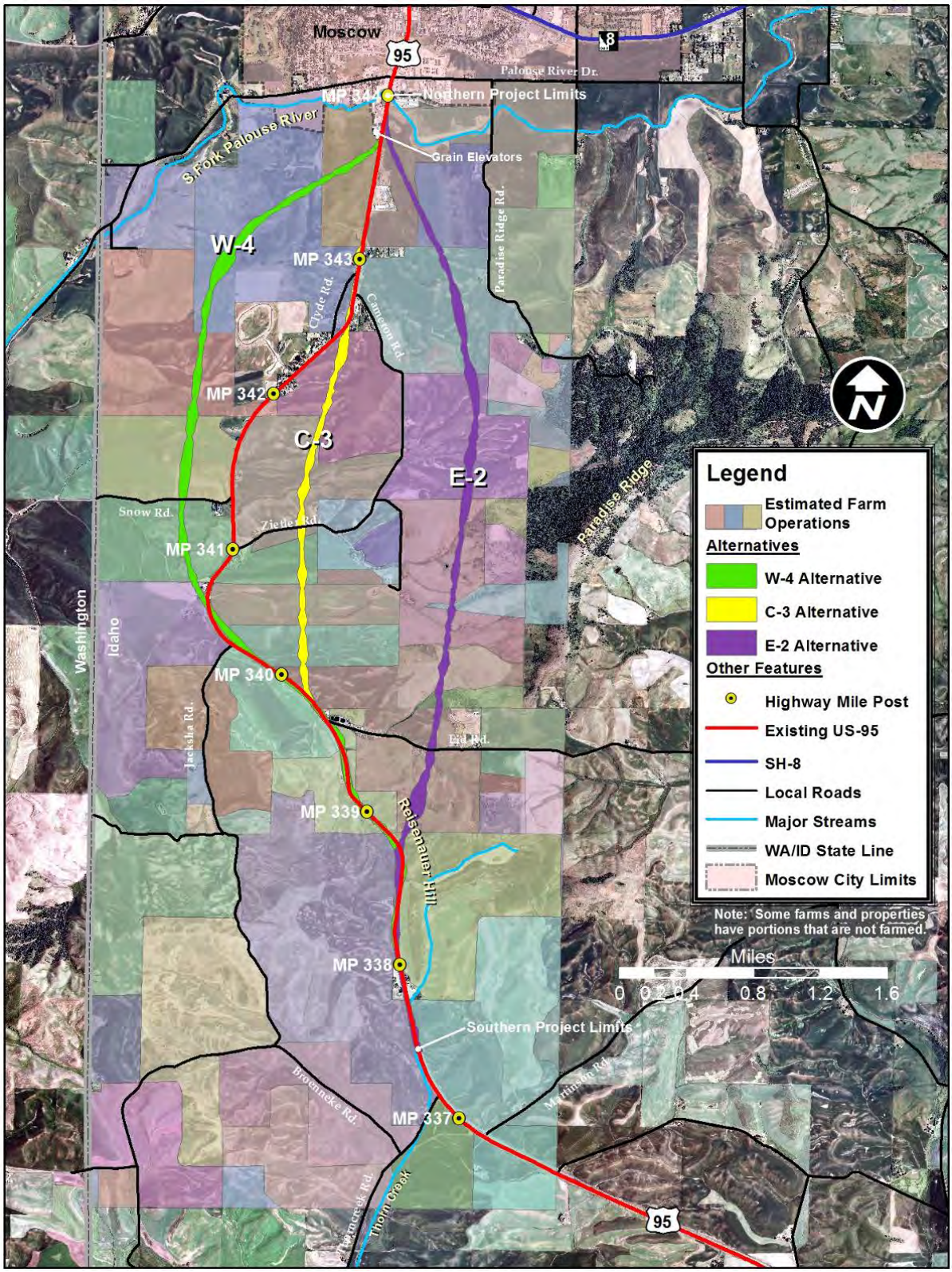
Alternatives	Farmland Conversion acres) *	Prime Farmland (acres)	Farmland of Statewide Importance (acres)	CRP Land (acres)	Other** (acres)	Segmented Farms (number of farms)	Farmland Conversion Impact Rating (points)
No Action	0	0	0	0	0	0	N/A-
Modified W-4	171.3	49.7	117.3	9	7.0	4	190
C-3	101.7	25.1	69.7	9	6.9	4	188
E-2	158.2	50.8	94.8	43.5	12.6	4	190

* This acreage excludes the existing road right-of-ways
**Other=unclassified farmland

NRCS staff completed USDA Farmland Conversion Impact Rating Forms for the three Action Alternative corridors. The form for the W-4 Alternative was updated for the Modified W-4 Alternative. All of the Action Alternatives were determined to have a Farmland Conversion Impact Rating of greater than 160 points, which is the threshold for requiring additional measures for protection from conversion of farmland to other uses. See Section 3.3.2 and the Farmland Technical Report for details regarding how the score was determined.

The most direct effects to farms would be the loss of farm production to transportation use for the area within each alternative's right-of-way. See Table 44. Farmland Effects. Direct effects would also include erosion and sedimentation from cut and fills. Construction of a highway alignment through farmland could result in farm segmentation. It could change access to fields and require farm equipment to cross the highway in order to access the segmented farms. It could also split farming operation into smaller, less economically feasible operations. Effects to farm operations are shown in Exhibit 26. Farm Operation Effects. The effects of alternatives on the ecological functions of CRP land are discussed in Section 4.8 Vegetation, Fish and Wildlife Effects.

Exhibit 26. Farm Operation Effects



Measures that would minimize the conversion of farmland to other uses include controlling access points along US-95 and working with farmers to identify necessary field accesses and to construct farmable slopes. See Chapter 9, Environmental Commitments under Farmland. See Chapter 6, Indirect and Cumulative Effects for the descriptions of effects from farm segmentation and effects to farm service operations.

No Action

This alternative would involve only minor safety and maintenance of the existing roadway and would not result in farmland conversion, segmentation or right-of-way acquisition. As congestion increases on the roadway, access to fields and farm related transport may become more difficult.

Modified W-4

The Modified W-4 Alternative would affect the greatest number of acres of statewide important farmland and the greatest number of acres of farmed land. The average farming operation in the Modified W-4 corridor is 882 acres. Approximately 5.6 percent of this assessment unit is CRP land. Modified W-4 would cross 11 farms, splitting four farming operations; however, this would not result in any farming operations less than 20 acres.

C-3

The C-3 Corridor has the fewest acres of prime and statewide important farmland. Approximately 8.8 percent of the land in this assessment unit is in CRP and planted with grasses. The C-3 Alternative would convert the least acres of prime farmland and farmland of statewide importance to other uses. The average farming operation in the C-3 corridor is 699 acres. C-3 would cross 13 farming operations and would split four farms. This would create two farming operations under 20 acres. The C-3 Alternative would utilize more existing right-of-way and would convert the least amount of farmland to other uses.

E-2 (Preferred Alternative)

E-2 would affect slightly more prime farmland than the other Action Alternatives. Approximately 27.7 percent of the land in the assessment unit is CRP land, primarily in the southern end of the corridor. However, the E-2 Alternative would affect the greatest acres of actively farmed land even after the CRP land is subtracted. E-2 would affect approximately twice as much CRP land compared to the other alternatives.

The average farm size along the E-2 Alternative is 636 acres. E-2 would cross nine farming operations and would split four farms. This would result in four farming operations less than 20 acres.

4.4 Cultural Resource Effects

There are three sites that are eligible for the National Register of Historic Places (NRHP) within the APE. The No Action, C-3 and E-2 alternatives would have no effect to cultural resources. The W-4 Alternative evaluated in the DEIS would adversely affect the Deesten/Davis farmstead. Following the DEIS publication, the W-4 Alternative centerline was shifted approximately 120 ft east to avoid the historic farmstead. This shifted alignment, the Modified W-4 Alternative, would have no effect to cultural resources. See Chapter 5, Section 4(f) Evaluation for additional detail. See Appendix 1, Key Agency Correspondence and Forms.

4.5 Floodplain Effects

Exhibit 27. Floodplain Effects displays the location of each alternative in relation to the 100-year floodplain. None of the alternatives would be located in the regulatory floodway, which is associated with the South Fork Palouse River. All Action Alternatives would be constructed with the roadbed greater than three feet above the level of a 100-year flood event. This will allow for a one-foot rise to the 100-year floodplain. Table 45. Floodplain Effects lists the type and amount of effects to floodplains for each alternative. See the Floodplain Technical Report for more information.

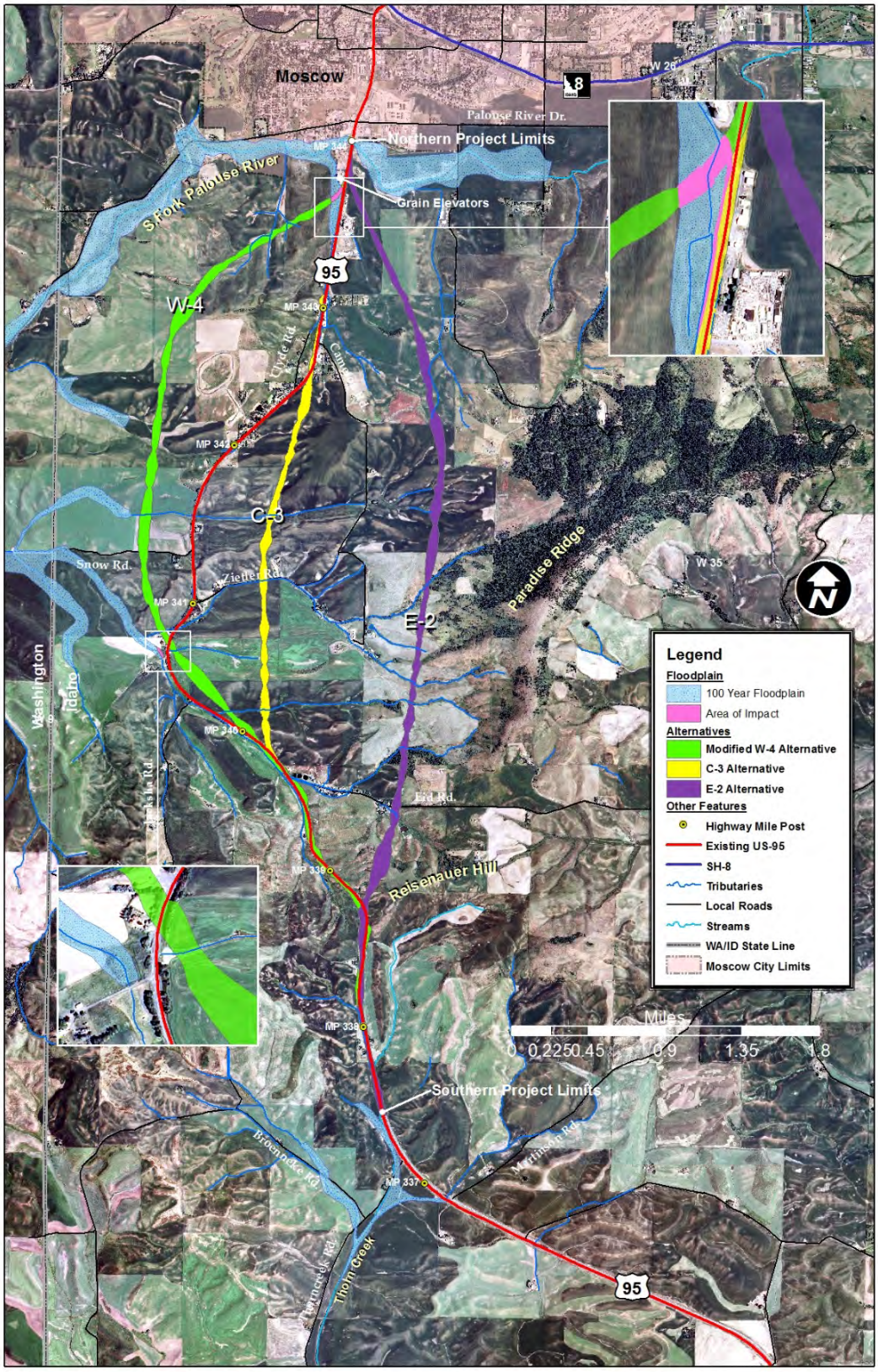
Table 45. Floodplain Effects

Alternative	100-year Floodplain Effects (acres)	Description of Effects (traverse or longitudinal)
No Action	0	None
Modified W-4	1.6	Transverse
C-3	1.8	Longitudinal
E-2	0	None

No Action

The No Action Alternative would not affect floodways or 100-year floodplains as no new roadway would be constructed.

Exhibit 27. Floodplain Effects



Modified W-4

Modified W-4 would have a transverse encroachment upon 1.6 acres of a 100-year floodplain near the South Fork Palouse River. This is a highly modified floodplain on agricultural land with degraded floodplain functions. It is associated with the headwaters of the South Fork Palouse River.

The roadway would cross the floodplain but would be designed to hydraulically pass the 25-year storm event. This could potentially impair the hydraulic flow and floodplain functions on the east side of the roadway fill, potentially resulting in an increase of flood elevations. These risks could be minimized through the use of an oversized pipe, or pipes to accommodate flood backwater. Effects to the natural and beneficial values of the floodplain would be minimal since the area is currently used as farmland. The affected beneficial values of the floodplain are further described in Section 4.6, Wetland and Tributary Effects and in the Wetland Delineation Technical Report.

C-3

C-3 would encroach upon one 100-year floodplain on the north end of the project in a headwater associated with the South Fork Palouse River. It would be a longitudinal encroachment of 1.8 acres, on agricultural land resulting from roadway widening. There are a few buildings in the vicinity of the floodplain; however, it would still be considered a low risk to buildings or other structures (ITD 2012b). Effects to the natural and beneficial values of the floodplain would be minimal since the area is currently used as farmland. The beneficial floodplain values that would be affected are discussed in Section 4.6, Wetland and Tributary Effects.

E-2 (Preferred Alternative)

E-2 would not encroach upon any 100-year floodplain and would be a practicable alternative to avoid floodplain effects.

While Modified W-4 and C-3 would encroach upon floodplains, all roadways for any of the alternatives would be designed to pass the 25-year storm event. The roadway would be designed to be three feet higher than the flood elevation to allow for a one-foot rise in elevation. Therefore, the effects would be minimized per the requirements of EO 11988 and 23 CFR 650, Subpart A.

Measures to minimize floodplain effects have been incorporated into the project, as have measures to restore and preserve the natural and beneficial floodplain values. E-2 would be the most practicable alternative under EO 11988 since it would not encroach on floodplains and would pose the least risk to the human and natural environment.

4.6 Wetland and Tributary Effects

4.6.1 Tributary Effects

All of the alternatives, including the No Action Alternative, could contribute transportation related pollutants to tributaries. Accumulated pollutants from operation and maintenance would build up on impervious surfaces such as the new alignments and existing loop road then run off as stormwater during rain events. The runoff may contain; gasoline, oil, hydraulic fluids, litter, dust, salt, sand, de-icing chemicals such as magnesium chloride, and tire and brake particulates such as zinc, copper, lead and other heavy metals. Stormwater could also contribute to increased erosion and sedimentation, increased peak flows, habitat alteration, and increased stream temperature. Stormwater is not commonly a source of bacterial pollutants or nutrients; therefore the alternatives should not contribute to increased bacteria or nutrient levels.

The degradation of water quality, effects to riparian habitat and soil disturbance could adversely affect the fish and other aquatic species that utilize the streams. Vegetation removal can increase stream temperatures and can lower the dissolved oxygen levels. Increased peak flows can increase erosion and sedimentation affecting spawning beds and fish migration. See Exhibit 28. Tributary Effects.

No Action

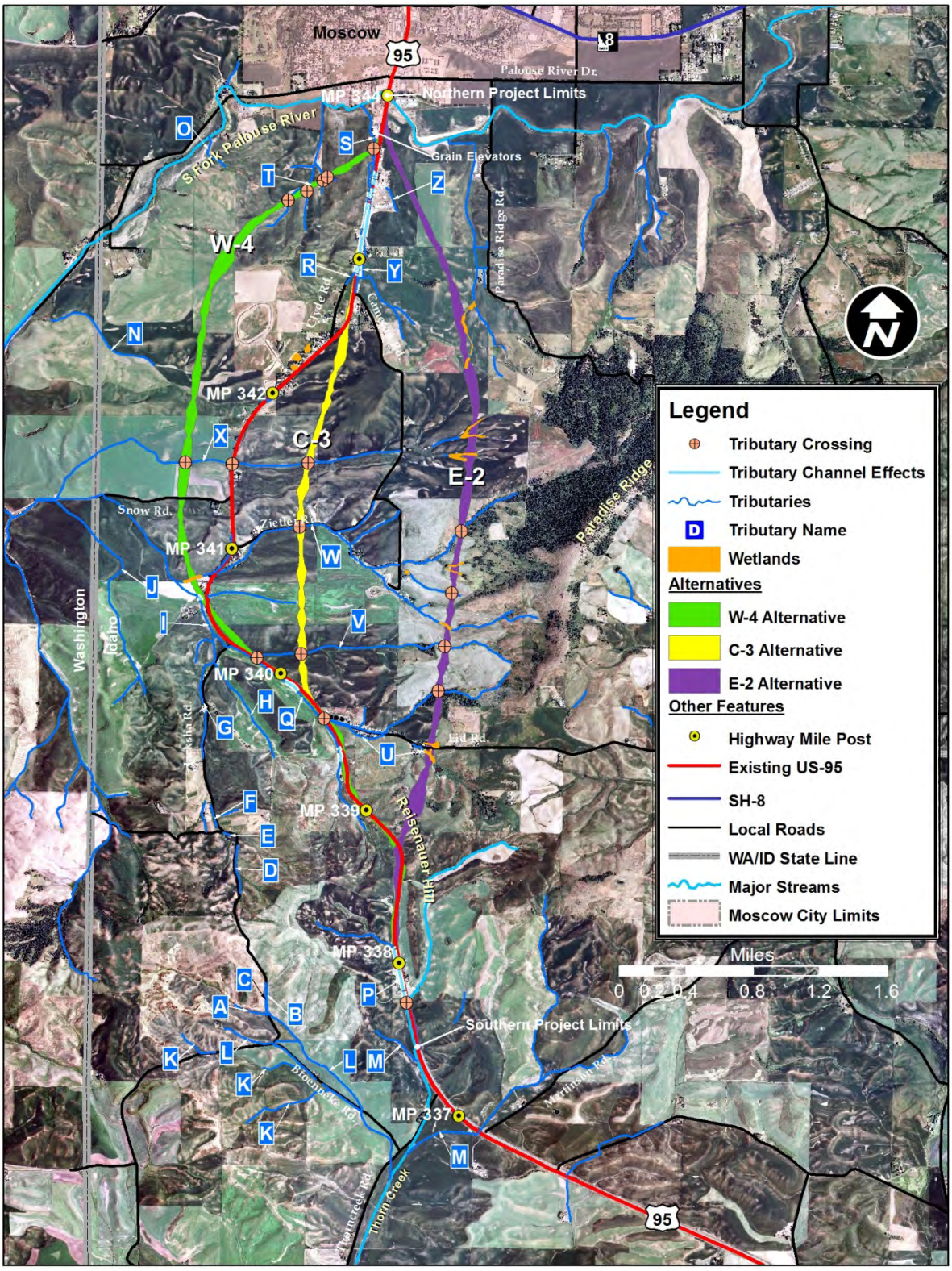
The No Action Alternative would not result in additional tributary crossings, new impervious surfaces, channel alteration, culvert removal, vegetation removal or other associated effects. However, the lack of formal stormwater collection and treatment along existing US-95 would continue to contribute to the degradation of water quality and could adversely affect fish and other aquatic species. There would continue to be temporary water quality effects due to maintenance activities.

Action Alternatives

The potential effects to tributaries common to all Action Alternatives include:

- Increased numbers of tributary crossings and lengthening of culverts
- Increased runoff due to new impervious surfaces such as roadways, parking lots or sidewalks.
- Increased erosion and sedimentation due to general construction activities near tributaries (i.e., road fill or culvert installation)
- Vegetation removal near tributary crossings and encroachments
- Utility relocations near waterways
- Placement of fill near waterways
- Improved hydraulic conveyance through culverts under reconstructed roadways

Exhibit 28. Tributary Effects



All Action Alternatives would involve construction of temporary and permanent BMPs to ensure compliance with the CGP, TMDLs and other regulatory requirements. The TMDLs and 303(d) listings for tributaries in the project area list sediment, stream alteration and temperature as pollutants. BMPs will be installed along the perimeter of the work area during construction and maintained throughout construction to reduce sediment from entering waterways. Turbidity testing will occur daily during in water work. Riparian areas that are disturbed will be reestablished with native vegetation that can provide shade, which could contribute to decreased downstream temperatures. Chemicals used during construction will be stored away from waterways or will have secondary containment measures in place to minimize the potential for contamination and spills. All of the Action Alternatives would be designed to pass a 25-year storm event.

Increasing the area of impervious surface and removing vegetation has the potential to increase water temperatures and lower dissolved oxygen levels, which could affect aquatic species. The numbers of tributary crossings, channel effects, new and total impervious surface area for each alternative is shown in Table 46. Tributary Effects.

Table 46. Tributary Effects

Alternatives	Crossings (number)	Channel Effects (linear feet)	Impervious Surface – Proposed Alignments (acres)	Impervious Surface – Remaining Loop Road (acres)	Total Impervious Surface (acres)
No Action	0	0	0	21	21
Modified W-4	10	3,592	58	10	68
C-3	5	7,808	49	9	58
E-2	5	2,592	55	17	72

Modified W-4

Modified W-4 would have the greatest number of tributary crossings but less than half the linear feet of stream impacts than the C-3 Alternative. Modified W-4 could result in greater water quality degradation compared to C-3 and E-2 due to the greater number of crossings. There may also be a corresponding effect to the aquatic species that occur in the streams. See Section 4.8, Vegetation, Fish and Wildlife Effects.

C-3

C-3 would have the same number of tributary crossings as E-2 but would affect approximately three times more linear feet of tributary channel than E-2 primarily due to the encroachment of the roadway on the sides of stream channels. It would have the fewest acres of new impervious and total impervious surface because it would follow existing US-95 for much of the alignment.

E-2 (Preferred Alternative)

E-2 would have the same number of tributary crossings as C-3 but would affect approximately one-third of the length of tributary channel; therefore, E-2 would result in less removal of riparian vegetation and less erosion and sedimentation due to channel realignments and scour. This would result in fewer effects to aquatic species and water quality in the tributaries. E-2 would affect some wetland areas that are the headwaters to the downhill tributaries or included within wetlands but are not individually classified as tributaries. The E-2 Alternative would have the greatest acres of total impervious surface but would cross the fewest feet of stream channel. The E-2 Alternative would increase the acres of impervious surface near the headwaters and tributaries which would result in increased stormwater discharge. This could result in increased scour, erosion, sedimentation and pollutant discharge into the receiving waters.

Avoidance, Minimization and Mitigation

All of the Action Alternatives would impact tributaries. Culverts would be aligned to follow the natural channel of the stream or creek whenever possible and will be designed to accommodate the hydraulic flows. Stormwater treatment will be implemented, and the SWPPP will address temporary construction measures to minimize harm. Once all practicable measures for avoidance and minimization are in place, remaining impacts will be mitigated through compensatory mitigation, which will be met through use of the Cow Creek Mitigation site, which has already been constructed. See Chapter 9, Environmental Commitments for details.

4.6.2 Wetland Effects

The FHWA requires consideration of all wetlands regardless of whether they are jurisdictional by the USACE. The wetland effects of each alternative are shown in Table 47. Wetland Effects. Only the wetlands affected by any of the alternatives are described in this section. See the Wetland Delineation Technical Report for information regarding all the wetlands.

No Action

The No Action Alternative would not directly affect wetlands.

Action Alternatives

The Action Alternatives would affect from 0.99 acres to 3.61 acres of 17 different wetlands. See Table 47. Wetland Effects and Exhibit 29. Wetland Effects. The majority of the wetlands in the project area are rated as Category III, Palustrine Emergent (PEM) wetlands. These are typically small wetlands that have been disturbed and have low vegetative diversity compared to Category I and II wetlands. Most of the wetlands that are affected drain into either the South Fork of the Palouse River or Thorn Creek, both of which are on the 303(d) list and are waters of the US.

Table 47. Wetland Effects

	Modified W-4 (acres)		C-3 (acres)		E-2 (acres)	
Wetland	PEM*	PSS**	PEM	PSS	PEM	PSS
W9	–	–	–	–	–	–
W10	0.15	–	–	–	–	–
W13	–	–	–	–	–	0.19
W20	0.36	–	–	–	–	–
W23	0.31	–	0.30	–	0.20	–
W24	0.15	–	0.16	–	–	–
W25	–	–	0.02	–	–	–
W26	–	–	0.23	–	–	–
W27	0.78	–	–	–	–	–
W28	0.04	–	0.04	–	0.04	–
W29	–	–	–	–	1.32	–
W31	0.06	–	–	–	–	–
W32	–	–	–	–	–	0.73
W35	–	–	–	–	0.75	–
W39	–	–	0.24	–	–	–
W40	–	–	–	–	0.25	–
W44	–	–	–	–	0.13	–
Subtotals	**1.85**	**0.00**	**0.99**	**0.00**	**2.69**	**0.92**
Totals	**1.85**		**0.99**		**3.61**	

*PEM=Palustrine Emergent

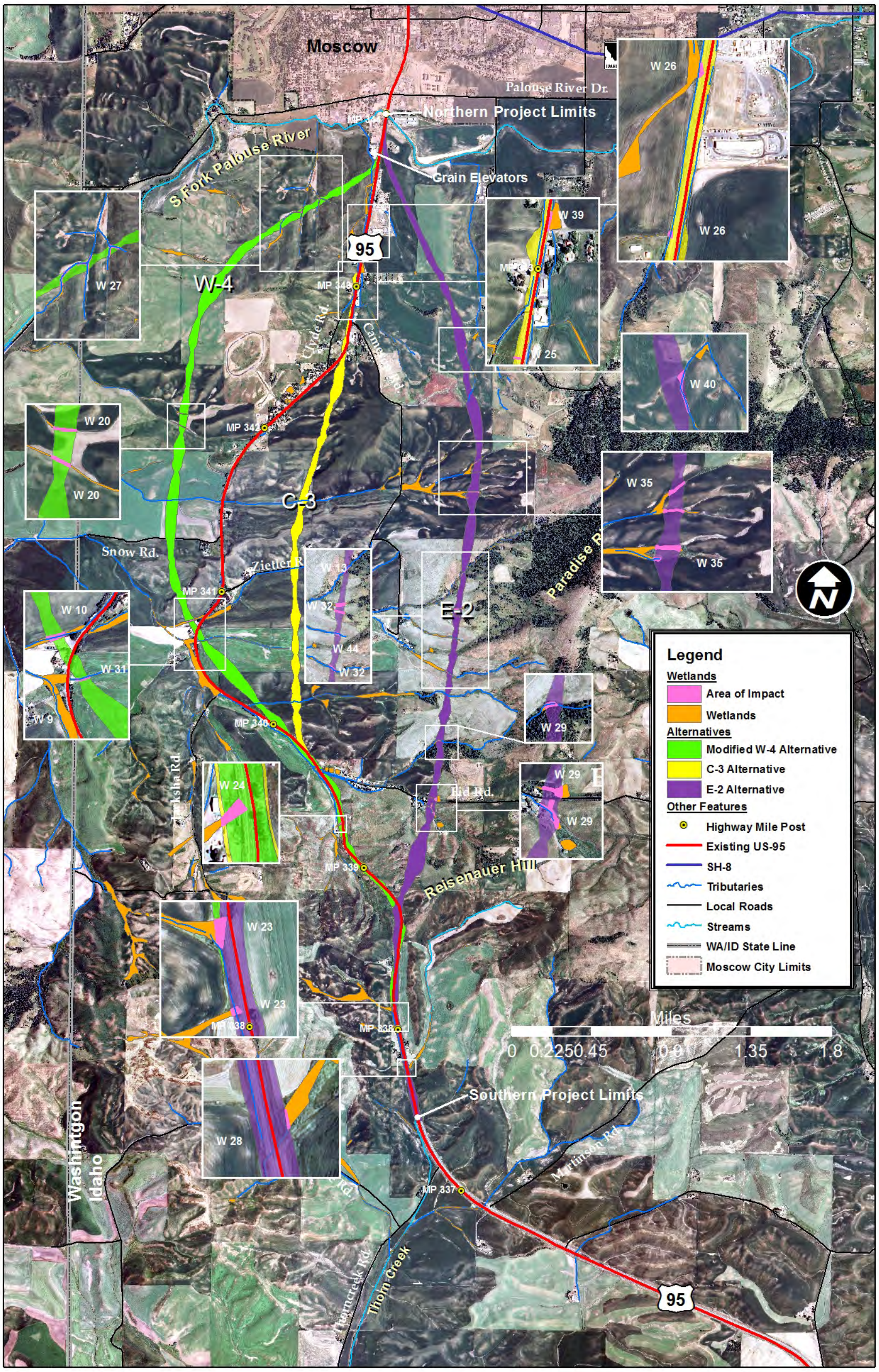
**PSS=Palustrine Scrub-shrub

Modified W-4

The majority of the wetlands affected by the Modified W-4 Alternative drain to the South Fork of the Palouse River. The remainder drains into Thorn Creek. Wetlands help to improve the water quality of these two water bodies, which are both listed on the 303(d) list. Filling wetlands could potentially increase the amount of pollutants and sediments that reach these waters.

The Modified W-4 Alternative would affect PEM wetlands all of which have been modified and are surrounded by active farming. Modified W-4 would affect 1.79 acres of Category III wetlands and 0.06 acres of a Category IV wetland. 1.48 acres of affected wetlands scored 50 percent or higher for improving water quality. Wetland 28, of which 0.04 is affected, scored 50 percent for wildlife habitat. Wetland 23 and Wetland 31 did not score over 50 percent in any of the three categories for wetland functions (Gilmore 2012).

Exhibit 29. Wetland Effects



Most of the wetland effects are the result of the new alignment crossing wetlands. Wetland 23 would have 0.31 acres of fill from widening and straightening the road on its existing alignment. The Modified W-4 would affect more wetland acres than C-3 but less than E-2.

C-3

The C-3 Alternative would have the least effects to wetlands out of the Action Alternatives. All six of the wetlands affected are Category III PEM wetlands and are either farmed or surrounded by farmland. Four of the affected wetlands (0.67 acres) scored a 50 percent or higher rating for improving water quality. There would be 0.04 acres of effects to Wetland 28 that scored 50 percent for wildlife habitat.

The wetlands affected by the C-3 Alternative are located near the existing highway and currently receive pollutants from road runoff. Four of the affected wetlands drain to the South Fork of the Palouse River. The remainder drains to Thorn Creek. The wetland effects would result from widening US-95 along its current alignment.

E-2 (Preferred Alternative)

Most of the wetlands affected by this alternative are Category III PEM wetlands. The remainder of the effect is to palustrine scrub-shrub (PSS) wetlands surrounded by farming activities. Approximately half of the wetlands affected by E-2 are associated with man-made ponds. Five of the affected wetlands (3.03 acres of impact) scored 50 percent or higher for improving water quality functions. Only one of the affected wetlands (0.04 acres of impact) scored a 50 percent or higher for improving habitat functions.

Two of the affected wetlands are PSS (13 and 32) with more diverse structure and wildlife habitat function compared to the PEM wetlands. These would be more difficult to replace compared to the PEM wetlands because woody vegetation takes longer to establish than emergent vegetation. However, because the proposed wetland mitigation involves applying mitigation credit from the Cow Creek Mitigation Area, which is already established and fully functioning, there would be no temporal loss.

Two of the wetlands affected drain to Thorn Creek and five drain to the South Fork of the Palouse River. One does not appear to have surface connection to other wetlands or tributaries. Most of the effects would be due to new sections of alignment. These wetlands are already disturbed and many of them have been altered or artificially created through the addition of ponds.

The E-2 Alternative would affect more wetlands that are functioning higher for habitat. The C-3 Alternative would have the least effect to wetlands in terms of acreage, function and value.

Executive Order 11990

Section 404(b)(1) Guidelines require all appropriate and practicable steps be taken to minimize adverse effects to the aquatic ecosystem. EO 11990, Protection of Wetlands states that wetlands may not be impacted unless there is no feasible or practical alternative to the proposed construction. All practical measures to minimize harm must be considered. The E-2 Alternative, FHWA's and ITD's Preferred Alternative, would have 3.61 acres of unavoidable wetland impacts. This evaluation of compliance with EO 11990 is for the Preferred Alternative (E-2).

During the initial screening of alternatives process, the E-1 and E-3 alternatives which had greater wetland impacts compared to the E-2 Alternative, were eliminated from further consideration. Compared to the action alternatives evaluated in the DEIS, the C-3 alternative would have the least impact and the E-2 Alternative would have the greatest impact. While the E-2 Alternative would have 2.62 acres more impact on wetlands compared to the C-3 Alternative, it would result in 43 fewer projected total crashes and nine fewer fatal and injury crashes between 2017 and 2036. This would have a significant benefit to the community and the travelling public and would best meet the project purpose and need.

Before final design, ITD will evaluate the use of crossings and other engineering solutions at the PSS wetlands to minimize harm to the more diverse wetlands and to help facilitate wildlife movement through the riparian area. This may also include evaluating slope angles to minimize wetland fill in a manner that still meets safety standards. Providing adequate temporary and permanent stormwater BMPs to comply with the CGP, TMDLs and the NPDES requirements will further minimize effects to wetlands and tributaries. Culverts in drainages will be oversized as possible to allow continued hydrological connectivity under the roadway and small mammal movement. Where practicable, trees and shrubs will be salvaged for reuse. BMPs, minimization measures and compensatory wetland mitigation measures are further discussed in Chapter 9, Environmental Commitments.

FHWA requires replacement of lost functions and values for all impacted wetlands, including wetlands non-jurisdictional by the USACE. Wetland impacts that cannot be avoided or minimized further will be mitigated through a compensatory mitigation process. Permitting will be completed in accordance with Section 404 of the CWA.

Mitigation will be implemented in accordance with 33 CFR 332 Compensatory Mitigation for Losses of Aquatic Resources and will replace any lost functions and values. A watershed approach will be used to identify compensatory mitigation for affected wetlands and tributaries.

Within the project vicinity the Cow Creek Mitigation Area has already been constructed and will compensate for effects from this and other ITD projects. The Cow Creek Wetland Mitigation Area was constructed with extra mitigation capacity in 2005 as part of the US-95, Top of Lewiston Hill to Genesee and Genesee to Thorn Creek Highway projects and is in the same watershed as the impacts. Because the site is already constructed and successfully functioning, there would be no temporal loss. The remaining credit has been approved by the USACE to compensate for the wetland impacts for the action alternatives for this project. See Appendix 1, Key Agency Correspondence.

The Cow Creek Wetland Mitigation Area included excavation, grading, irrigation, well drilling, placing brush piles, large woody debris, nest boxes, plantings for the mitigation area and other habitat features. Plantings consisted of 1,400 trees, 20,500 shrubs, 4,400 willow stakes, and 34,500 wetland species plugs. Unsuccessful plants were replaced and emergent vegetation was over-seeded with wetland mix as necessary. The site was monitored and the mitigation was considered by the USACE to be successfully completed with 80 percent plant survival and site stabilization after three years.

If an action alternative is selected, and if during the design process, more wetland is impacted than is stated in the FEIS, then additional wetland mitigation will be required. This requirement could be met by purchasing credits from the Valencia Wetland Mitigation Bank, which services the project area. The bank was assessed and was given credits based on functional units. With the USACE approval, Valencia can provide mitigation in a cost effective manner and will ensure that all of the affected functions and values are successfully mitigated because the functions and values have already been successfully established. This method would also have no temporal loss of wetland functions and values. The Valencia Wetland Mitigation Bank is approved to provide the following mitigation:

- Listed/Proposed Threatened and Endangered Species
- Idaho Natural Heritage Species Habitat
- Wildlife Habitat
- General Fish/Aquatic Habitat
- Flood Attenuation
- Short and Long Term Surface Water Storage
- Sediment/Nutrient/Toxicant Removal
- Sediment/Shoreline Stabilization
- Production Export/Food Chain Support
- Groundwater Discharge/Recharge
- Uniqueness
- Recreational/Education Potential

Other wetland mitigation measures are included in Chapter 9, Environmental Commitments. Based upon the above considerations, and in consideration of the proposed mitigation, it is determined that there is no practicable alternative that avoids all construction in wetlands and tributaries and that the proposed action includes all practicable measures to minimize harm to wetlands and tributaries which may result from such use.

4.7 Groundwater Effects

Potential transportation related effects to groundwater could include:

- Slower recharge rates due to increased impervious surface areas (such as roadways, parking lots or sidewalks)
- Hazardous material spills from the travelling public or construction equipment
- Accidental spills during utility relocation
- Discharge of untreated stormwater into underground injection wells
- Contamination during well decommissioning
- Altering groundwater discharge and recharge areas

The project is located over the Wanapam and Grand Ronde aquifers, which are overlain by rich loess soils with high water holding capacity. The potential effects of the alternatives to groundwater due to hazardous material sites and hazardous material handling are discussed in Section 4.14 Hazardous Materials Effects. A Hydrogeologic Analysis was prepared after the DEIS hearing to address concerns regarding possible groundwater impacts from construction of the alternatives (Ralston 2014).

The No Action Alternative would continue to use existing US-95, which has no formal stormwater treatment areas. It would not increase impervious surface but untreated stormwater would continue to flow to tributaries and groundwater.

The potential alternatives' impacts to groundwater are very low. All Action Alternatives would increase impervious surfaces that could contain highway related pollutants that could drain to groundwater; however, the amount of new impervious surface is a small percentage of the total recharge area. Snow accumulated along the roadway and road runoff could recharge to groundwater. The amount of this increase will be very small and is balanced by a decrease in recharge from the paved areas. In addition, the aquifers used for water supplies are generally more than 100 ft below the surface with a very limited hydraulic connection to the surface waters. The surface water crossings will be through culverts and bridges (Ralston 2014).

Most of the road alignments are underlain by granitic or metamorphic rock and any discharge to groundwater in these areas would occur in topographically low areas such as streams. The

highway in these areas would be elevated on fill or bridges and surface water would flow through culverts or under the bridges. Stormwater would be discharged to the road fill, which would treat the stormwater and minimize potential water quality impacts. The emergence of seeps could shift from under the fill to the toe of the roadway fill (Ralston 2014).

See Section 4.6.1, Tributary Effects for a description of transportation related effects. All Action Alternatives would be designed and constructed to comply with the CGP and TMDLs. A SWPPP that will identify temporary and permanent BMPs such as grassy swales or check-dams will be prepared and implemented. With the implementation of these BMPs, there would be a low risk of aquifer contamination from stormwater.

4.7.1 Affected Wells

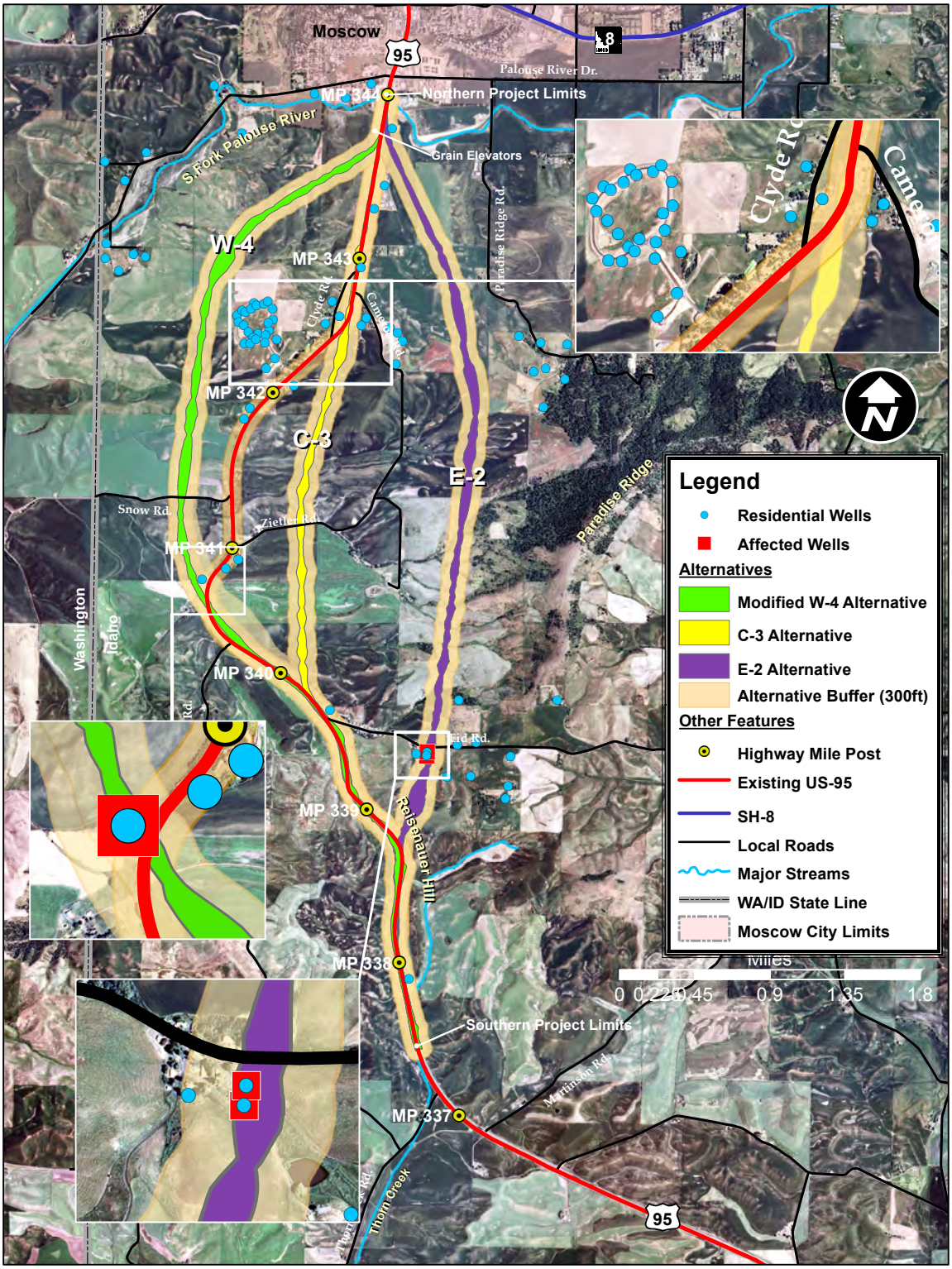
There are numerous domestic and irrigation wells within the project area. Most of these wells exceed 100 feet in depth and obtain water from a producing zone at the bottom of the well. Wells that are completed in basalt are located mostly at the north end of the project. These wells obtain water from the Wanapum Formation, which hosts the upper aquifer in the Moscow area.

The No Action Alternative would not require right-of-way acquisition or construction; therefore, it would not affect wells within the project area. The Modified W-4 and E-2 alternatives would affect wells, all of which are domestic. Both wells impacted by the E-2 Alternative are located along Eid Road but neither would be replaced because the residences would be impacted and the well would not be replaced. The well impacted by the Modified W-4 Alternative would be replaced. Well relocations may cause a short-term interruption of water service during construction. Drinking water may be temporarily affected by suspended sediments caused by well drilling. Exhibit 30. Affected Wells and Table 48. Affected Wells show the known or registered wells that would be affected by each alternative. See Chapter 9, Environmental Commitments.

Table 48. Affected Wells

Alternatives	Affected Domestic Wells	Domestic Wells within 300 ft
No Action	0	10
Modified W-4	1	3
C-3	0	6
E-2	2	5

Exhibit 30. Affected Wells



4.8 Vegetation, Fish and Wildlife Effects

4.8.1 Vegetation and Habitat Effects

All of the Action Alternatives would pass through similar agricultural or rural residential lands, which constitute low to marginal quality wildlife habitat. See Table 49. Habitat Type Effects for acres of agricultural land. The Action Alternatives also transect habitat types that support a greater diversity of vegetation, fish and wildlife species including wetlands, riparian areas, pine stands, Palouse remnants and areas with water sources. A pine stand that provides potential habitat for long-eared myotis and habitat for pygmy nuthatch would be affected by the E-2 Alternative. The ungulate impact area includes the impacts to this pine stand. See Table 49. Habitat Type Effects.

Table 49. Habitat Type Effects

Alternative	Agricultural/ Grassland (acres)*	Pine Stands (acres)	Ungulate Impact Area (acres)**	New Right-of-Way (acres)
No Action	0	0	0	0
Modified W-4	162	0	0	206
C-3	101	0	0	154
E-2	158	3.9	4.4	207

*Source: (Haagen 2006)

**Source: (Melquist 2005a)

Pine Stand Effects

The No Action, Modified W-4 and C-3 alternatives would not affect pine stands that could provide potential nesting habitat for pygmy nuthatch, long-eared myotis, northern alligator lizard or other species. The E-2 Alternative would affect a pine stand.

Melquist in his report stated that suitable habitat for pygmy nuthatch is limited along the edge of the eastern corridor. He identified pine stands along the project corridor that could offer suitable pygmy nuthatch habitat. One stand is located at the lower end of a forested draw with up to 60 mature ponderos pine trees and would not be affected by the action alternatives.

A pine stand and woodlot owned by the Dumroese family has approximately ten snags and an estimated four mature pine trees with dead tops. This pine stand is small and isolated from the larger pine stand that occurs on Paradise Ridge. It offers potential habitat for long-eared myotis, northern alligator lizard and other species. Pygmy nuthatches are reported to utilize this pine stand (Melquist 2005b).

The E-2 Alternative would affect 3.9 acres of this pine stand leaving approximately six acres of pine stand on the west side of the highway and approximately 20 acres of pine stand on the east

side of the highway. The remainders of the pine stand could still be utilized by pygmy nuthatch but use could be reduced due to fragmentation and other factors. See Section 6.1 Indirect Effects under Fragmentation. Pygmy nuthatch territory size may range from approximately one to 20 acres (0.54 to 8.15 ha) (Norris 1958, Balda 1967, Storer 1977). Territory size varies with the number of nuthatches present, pine tree density, and availability of snags or nest boxes (Ghalambor 2006). Territory size on heavily logged plots versus thinned plots (Braun and Balda 1988a) and on plots with nest boxes in snag-poor habitats is significantly larger (Brawn and Balda 1988a, Bock and Fleck 1995).

While Melquist stated there would be no direct impact to long-eared myotis or pygmy nuthatch due to construction of any of the alternatives, the loss of habitat is expected to result in indirect impacts to resident populations. (Melquist 2005b). See Section 6.1 Indirect Effects.

Melquist identified other suitable habitat nearby at Paradise Ridge and throughout Northern Idaho (Melquist 2005b). In his report Melquist states that other pygmy nuthatch suitable habitat is located near the Dumroese property, near the Robinson Lake Park in Moscow, Idler's Rest and most of the areas of the Palouse that still have ponderosa pine (Melquist 2005b; figure 3). The WCS (IDFG 2005) generally describes the Palouse Prairie Ecosystem and provides mapping of dry conifer forest, listing it as habitat for many species including pygmy nuthatch and northern alligator lizard. Dry conifer forest is shown to cover approximately 42 percent of the Palouse Prairie Ecosystem (IDFG 2005).

The pygmy nuthatch is protected under the Migratory Bird Treaty Act and no active nest sites can be destroyed or removed. Tree removal would occur outside of the nesting season (April 1 to August 1) to avoid impacts to nesting birds. Measures that would mitigate for the loss of the pine stand include adding nest boxes (Melquist 2005b) as described in Chapter 9, Environmental Commitments.

Riparian Habitat Effects

The No Action Alternative would not directly affect any riparian habitat. All of the action alternatives would cross tributaries; however, crossings would be designed to allow for hydraulic flow to continue under the roadway. Crossings may include, bottomless box culverts, culverts placed at-grade or use of stream simulation designs. Where practicable, provisions for terrestrial species movement would be incorporated into the crossing design. See Chapter 9, Environmental Commitments. C-3 would affect the greatest length of tributaries, whereas the E-2 alternative would affect the least. See Section 4.6, Wetland and Tributary Effects for additional detail. See the Wildlife Technical Reports for additional detail.

Palouse Remnant Effects

The No Action Alternative would not involve road realignment, major soil disturbing activities or removal of existing vegetation, and therefore would not directly affect the Palouse remnants.

The Modified W-4, C-3 and E-2 alternatives would not directly affect Palouse remnants. See Chapter 9, Environmental Commitments for mitigation measures. Indirect effects are discussed in Chapter 6, Indirect and Cumulative Effects.

Matrix Habitat Effects

The action alternatives would all bisect agricultural land and CRP land that can be considered as matrix habitat. These, while non-native, may still provide some level of function for wildlife and pollinators. The greater impacts to CRP lands by the E-2 alternative could affect bees, grassland birds, and other wildlife more than the Modified W-4 and C-3 alternatives; however, bees and other species would also utilize roadside weeds, Palouse remnants and the surrounding agricultural matrices. The greater proximity of the E-2 Alternative to Palouse remnants could adversely affect the native plants utilized by bumblebees but would be minimized through the implementation of mitigation measures including weed control as described in Chapter 9, Environmental Commitments.

Exhibit 31. Habitat Feature Effects

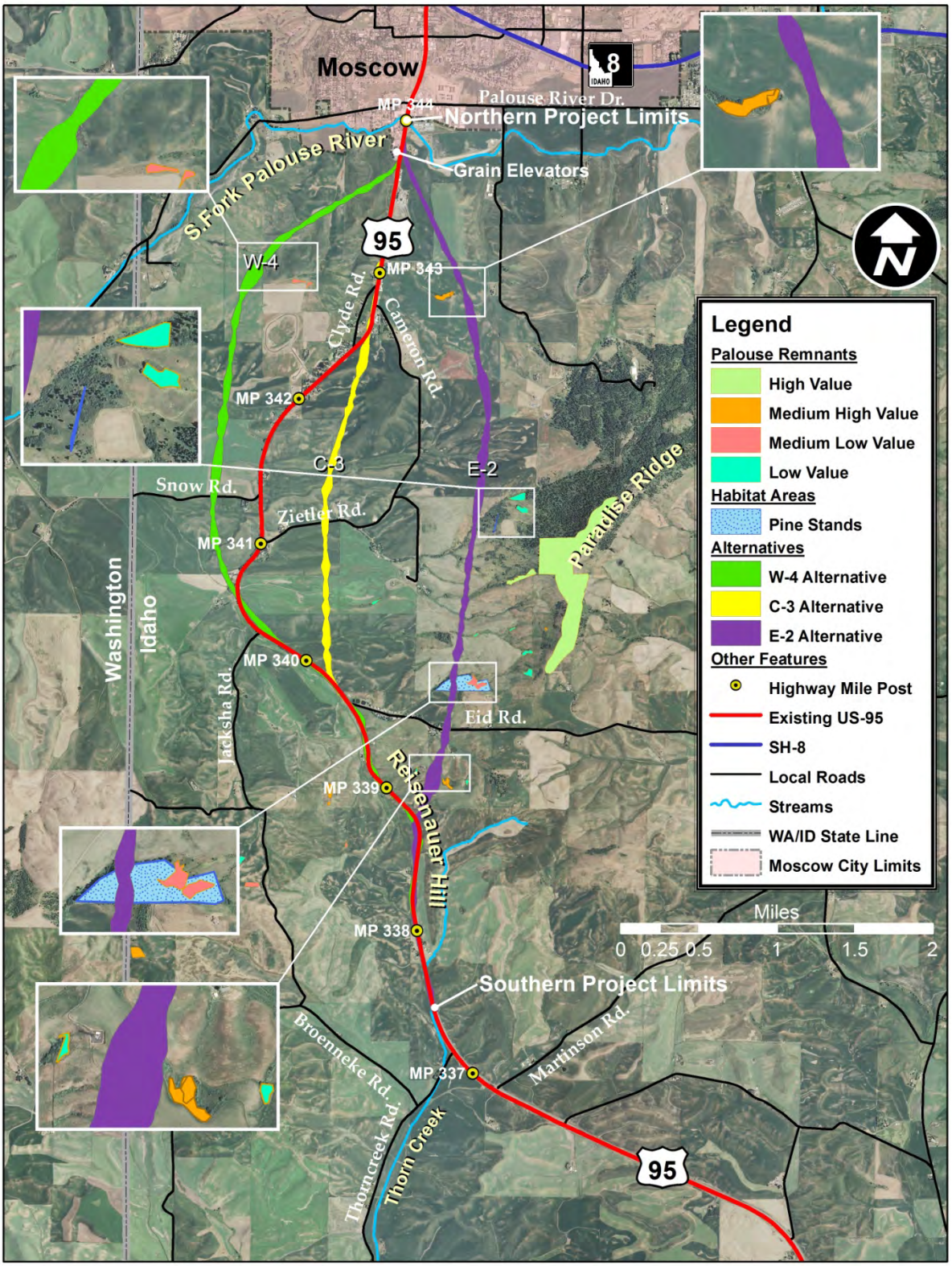


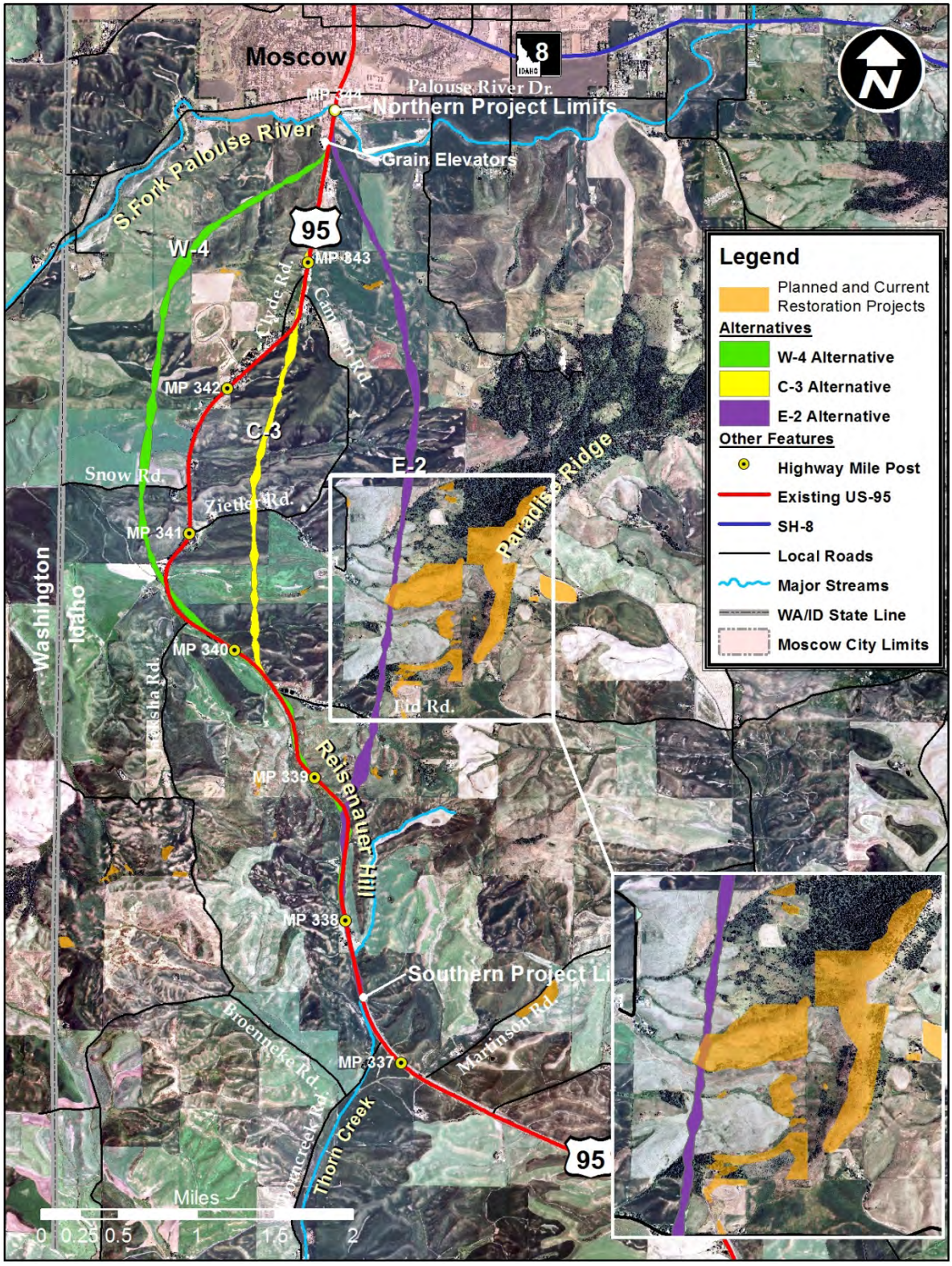
Exhibit 32. Farmed Land on the E-2 Alignment



Palouse Restoration Projects Effects

The No Action, Modified W-4 and C-3 alternatives would not directly affect planned or current restoration projects. The E-2 Alternative would directly affect a property with an easement for restoration activities under the USFWS Partners Program. However, the section of the property that would be affected is an actively producing wheat field and any on-going or planned restoration activities are approximately 200 feet from the alignment. Those restoration activities include ecological weed control (hand-pulling weeds) and planting Spalding's catchfly. While the E-2 Alternative would not directly affect the areas where restoration activities are occurring or are planned; it would bring the roadway closer to the projects compared to the other alternatives. See Exhibit 33. Planned and Current Restoration Projects.

Exhibit 33. Planned and Current Restoration Projects



ITD and FHWA recognize that there has been substantial agency and community involvement in restoration activities in the area (See Exhibit 33. Planned and Current Restoration Projects) and while none of the alternatives directly affect the projects, all could increase weed dispersal to these areas. FHWA and ITD have worked with the resource agencies involved in the restoration activities to prioritize projects on land furthest from the alignments. Indirect and cumulative effects to Palouse Restoration Projects are described in Chapter 6, Indirect and Cumulative Effects.

Rare Plant Effects

None of the alternatives would directly affect any known occurrences or populations of rare plants. Indirect and cumulative effects are discussed in Chapter 6, Indirect and Cumulative Effects.

Invasive Plant Effects

Additional information regarding weed species, weed dispersal and potential effects have been incorporated from the DEIS Technical Report titled A Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between Uniontown Cutoff and Moscow (Lass & Prather 2007) and the Biological Evaluation of Plant Species and Communities of Conservation Concern in the US Highway 95 Thorncreek Road to Moscow Project Area (Litchardt 2005).

Non-native invasive species, or weeds, may establish in the road right-of-way resulting in direct effects and may potentially continue to spread outside of the right-of-way in later years resulting in indirect effects. These effects could occur for any of the alternatives. Weeds could diminish habitat quality and adversely affect biodiversity (Parker et al. 1993) by altering the native plant communities. Weeds are already present in the project area and are predicted to spread as a result of soil disturbance and vehicular travel through the corridor.

The potential for weeds to move from the roadside into a remnant will be dependent on their dispersal methods, distance to the remnant, and the surrounding land use. Common weed sources include stockpiled material, staging areas, imported soils, construction equipment, and workers. Alignments with steep road cuts and fills with south and west aspects will be drier sites and it will be difficult to establish native vegetation resulting in more open spaces for infestation. Section 6.1 Indirect and Cumulative Effects provides more information regarding indirect and cumulative effects due to weed dispersal.

In May 2014, ITD and IDFG met to further discuss impacts and agreed on suitable mitigation measures for vegetation, fish and wildlife effects, which have been added to Chapter 9,

Environmental Commitments. ITD will continue to work with IDFG before final design to further refine the mitigation measures and help ensure their successful implementation.

4.8.2 Wildlife Species Effects

To assess the relative effects of the alternatives to all vegetation, fish and wildlife species would be difficult. IDFG prepared an assessment of project effects to Species of Greatest Conservation Need (SCGN) that were likely to be found in the project area which were identified through a filtering process and determined to be representative of wildlife species in the area. The rationale for identifying these species for evaluation is described in Section 3.8.2 Methodology and the rationale for making the effect determinations are explained in the General Wildlife Assessment (IDFG 2006).

For each of the representative species, project effects were based on occurrence of the species in the project area and the presence of suitable habitat in the area. If the species were not known to occur in the project area and no suitable habitat was present for the species, then it was determined the alternatives would not affect the species. However, if suitable habitat for the species was present, regardless of whether there were known or recorded occurrences, the project was assumed to affect the species (IDFG 2006). IDFG also assumed that all new right-of-way required by each alternative was suitable habitat for those species affected; therefore, the relative difference in right-of-way required for each alternative relates to the relative effects to the species. Based on this method, the E-2 Alternative would have the greatest effects to wildlife and would impact Northern alligator lizard, Pygmy nuthatch and Long-eared myotis because it would affect a pine stands that is considered suitable habitat for these species, whereas the other alternatives would avoid the pine stand. The C-3 Alternative would have the least effect to the wildlife because it would require the least amount of new right-of-way.

Table 50. Representative Wildlife Species Effects

Species	Potential Species Effects			
	No Action	Modified W-4	C-3	E-2
Woodhouse's toad	No Impact	No Impact	No Impact	No Impact
Mountain quail	No Impact	No Impact	No Impact	No Impact
Peregrine falcon	No Impact	No Impact	No Impact	No Impact
Yellow-billed cuckoo	No Impact	No Impact	No Impact	No Impact
Townsend's big-eared bat	No Impact	No Impact	No Impact	No Impact
Nimapuna tigersnail	No Impact	No Impact	No Impact	No Impact
Pale jumping-slug	No Impact	No Impact	No Impact	No Impact
Fir pinwheel	No Impact	No Impact	No Impact	No Impact
Salmon coil	No Impact	No Impact	No Impact	No Impact

Species	Potential Species Effects			
Lyre mantleslug	No Impact	No Impact	No Impact	No Impact
Dry land forest snail	No Impact	No Impact	No Impact	No Impact
Oregonian (2 species)	No Impact	No Impact	No Impact	No Impact
Humped coin	No Impact	No Impact	No Impact	No Impact
Giant Palouse earthworm	No Impact	No Impact	No Impact	No Impact
Northern alligator lizard	No Impact	No Impact	No Impact	Potential Impact
Ring-necked snake	No Impact	Potential Impact	Potential Impact	Potential Impact
Swainson's hawk	No Impact	Potential Impact	Potential Impact	Potential Impact
Long-billed curlew	No Impact	Potential Impact	Potential Impact	Potential Impact
Short-eared owl	No Impact	Potential Impact	Potential Impact	Potential Impact
Grasshopper sparrow	No Impact	Potential Impact	Potential Impact	Potential Impact
Pygmy nuthatch	No Impact	No Impact	No Impact	Potential Impact
Long eared myotis	No Impact	No Impact	No Impact	Potential Impact
California myotis	No Impact	Potential Impact	Potential Impact	Potential Impact
Stonefly (5 species)	No Impact	Potential Impact	Potential Impact	Potential Impact
Mayfly (2 species)	No Impact	Potential Impact	Potential Impact	Potential Impact
Spur-throated grasshopper (2 species)	No Impact	Potential Impact	Potential Impact	Potential Impact

Other Species Considered and Habitat Effects

No Action

The No Action Alternative would have no direct effect to vegetation and wildlife habitat. Wildlife collisions would continue to climb with increased traffic volumes.

Modified W-4

Modified W-4 would run primarily through agricultural land that functions as foraging and breeding habitat for many wildlife species including the Giant Palouse earthworm. The Modified W-4 Alternative would convert the greatest amount of farmland that functions as foraging and breeding habitat for many wildlife species. It would avoid the pine stands. Modified W-4 would cross 10 tributaries that provide habitat for resident wildlife species.

C-3

The C-3 Alternative would pass through some agricultural areas including potential habitat for the giant Palouse earthworm but would utilize much of the existing US-95 roadway. C-3 would result in the fewest acres of conversion of farmland that currently functions as foraging and breeding habitat for many wildlife species. It would avoid the pine stands. The C-3 Alternative would cross five tributaries that possess habitat for resident wildlife species.

E-2 (Preferred Alternative)

The E-2 Alternative would pass through cultivated agricultural lands and CRP lands located west of Paradise Ridge. The farmland along E-2 is considered more suitable for ungulates because of nearby cover and water sources. See Exhibit 32. Farmed Land on the E-2 Alignment. It would not disturb the large stands of forested habitat on Paradise Ridge but is closer to Paradise Ridge than the other alternatives. It would, however affect a planted pine stand near Eid Road that could provide suitable habitat for representative wildlife species including the northern alligator lizard and long-eared myotis and provides habitat for pygmy nuthatch. See Section 4.8 under Pine Stand Effects. It may also provide habitat for the giant Palouse earthworm. The E-2 alternative would cross fewer tributaries compared to the Modified W-4 Alternative, however; the tributaries that are affected by E-2 have greater habitat value for resident wildlife species than tributaries that are affected by either the Modified W-4 or C-3 alternatives.

Ungulate Effects

A study titled Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow (Sawyer 2010) evaluated the ungulate studies prepared for the project by Melquist and Ruediger. The study summarized the conclusions regarding quality of ungulate habitat in the project area, the potential effects of the alternatives to those habitats, and provided an independent assessment of potential impacts. The report found that the Melquist and Ruediger reports were consistent regarding general habitat quality and the relative alternatives' effects to habitat. It also made an independent recommendation for ungulate mitigation. See Table 51. Ungulate Habitat Effects. The studies concluded that none of the Action Alternatives would bisect important ungulate habitat or known migration corridors and that population-level effects from highway construction were unlikely.

Table 51. Ungulate Habitat Effects

	Habitat Quality*		
Alternative	Moose	Elk	White-tail deer
No Action	None	None	None
Modified W-4	Poor	Poor	Marginal
C-3	Poor	Poor	Marginal
E-2	Marginal	Marginal	Moderate

Source: (Sawyer 2010)

*Ungulate habitat on scale of increasing value is: none, poor, marginal, moderate and high.

Ungulates utilize and move to all types of habitat but frequently utilize areas with shelter and cover, riparian areas, and areas with water sources. Ungulates have been sighted and utilize habitat in the project area; however, only poor to moderate quality ungulate habitat is present. The primary ungulate habitat affected by all alternatives is cultivated agricultural land, much of which is presently enrolled in the CRP; however, CRP enrollment is voluntary and landowners may withdraw at any time. It offers no special or long-term protection from development. See

Section 4.10 Transportation and the Safety Technical Report for information regarding wildlife collision data factors. Future effects to agricultural lands and wildlife habitat due to development are further discussed in Chapter 6, Indirect and Cumulative Effects.

No Action

The No Action Alternative would not directly affect ungulate habitat. It could however, result in more wildlife collisions due to an increase in projected traffic volumes on US-95 by the 2037 design year. The substandard curves, steep grades and narrow typical section would not be improved making it difficult to spot and avoid wildlife. The projected increase in traffic and the density of traffic flow could result in greater numbers of wildlife collisions on this segment of US-95. The No Action Alternative would not meet the project purpose and need.

For the Action Alternatives, realigning a highway to an area where no road currently exists and clearing vegetation near the roadway would result in direct habitat loss, a visual change to the area and may displace wildlife less adaptable to human modification, fragmentation and high levels of human use such as elk and moose (Ruediger 2007). For all of the alternatives, clearing vegetation will be limited to the project right-of-way. Noise and increased human presence could displace ungulates in the area during construction and roadway operation. The Action Alternatives could result in effects to poor to moderate quality ungulate habitat. See the Wildlife Technical Reports for additional detail regarding the degrees of effects and the differing quality of the affected habitat.

A straighter roadway alignment, additional lanes and a wider roadway would improve the visibility of wildlife crossing the roadway, and would improve the ability of the driver to avoid and recover from potential wildlife collisions. Safety related to wildlife was evaluated as part of the Safety Analysis Technical Report (ITD 2013, ITD 2015b) and is discussed further in Section 4.10.1 under Wildlife-Related Safety.

Modified W-4

Modified W-4 would pass through primarily agricultural land without suitable cover near foraging areas. Therefore, it is considered poor habitat for elk and moose. This alternative would also pass through marginal white-tail deer habitat.

C-3

C-3 would pass through poor habitat for elk and moose. It would pass through marginal white-tail deer habitat. The C-3 would bring the curves and grade to AASHTO standards and would improve sight distance over existing conditions. (ITD 2013 pg 12).

E-2 (Preferred Alternative)

E-2 would pass through marginal habitat for elk and moose located in the southern half of the study area, primarily on CRP land and farmed fields. Moderate white-tail deer habitat would also be affected. E-2 would be aligned between an existing man-made farm pond that may be used by wildlife, and Paradise Ridge. E-2 could affect the movement of moose and elk that currently travel between the pond and Paradise Ridge.

Elk tend to stay closer to security and escape cover than deer. A pine stand located in the southern half of the project may be used for cover by ungulates as they forage in the nearby agricultural fields. The E-2 Alternative would affect 3.9 acres of the pine stand as well as surrounding agricultural land that is used for foraging which would affect elk. A total of 4.4 acres of suitable ungulate habitat that was identified as the Ungulate Impact Area by Melquist in 2005 would be affected by the E-2 Alternative (Melquist 2005a).

The E-2 Alternative posed the largest concern for ungulates due to its proximity to small patches of native habitats not yet converted to agriculture (i.e., pine stands and Palouse remnants) (Sawyer 2010). More suitable habitat for ungulates is available in the surrounding areas east of Paradise Ridge and in the gullies further west in Washington State (Ruediger 2007). Regionally and statewide, the area is considered to have low ungulate populations (Ruediger 2007) and low to moderate quality ungulate habitat (Sawyer 2010). While the E-2 Alternative would pass through approximately 1.98 miles of ungulate impact area; the sight distance will be greater on the E-2 Alternative because the length and radius of horizontal curvature is greater than the other action alternatives. Greater sight distance may reduce the crash potential of the wild animal crashes of the E-2 Alternative and offset the additional wild animal crash potential caused from the E-2 Alternative being in an ungulate impact area. (ITD 2015 pg. 12). See Table 51. Ungulate Habitat Effects for a summary of the alternatives' effects to ungulates. See the Wildlife Technical Reports for additional detail.

4.9 Threatened and Endangered Species Effects

This section summarizes the effects of the alternatives on federally listed threatened and endangered species and critical habitat. A discussion of federal candidate and proposed species is included in 3.8, Vegetation, Fish and Wildlife and 4.8, Vegetation, Fish and Wildlife Effects.

No Action. The No Action Alternative would not involve right-of-way acquisitions, major construction or a large amount of soil disturbance; therefore, it would have no effect to threatened or endangered species and designated critical habitat. The higher projected traffic volumes and the density of traffic flow could result in greater numbers of wildlife collisions on this segment of US-95.

Modified W-4, C-3 and E-2 (Preferred Alternative). The Action Alternatives would result in no effect to Canada lynx, water howellia, steelhead trout and its designated critical habitat. Modified W-4, C-3 and E-2 may affect but are not likely to adversely affect Spalding's catchfly due to indirect effects. The W-4 and Modified W-4 Alternative represent only a slight shift and would not differ in effects to the evaluated species or their habitats; therefore the effect determination for the W-4 Alternative is determined to be valid for the Modified W-4 Alternative. See Table 52. Threatened and Endangered Species Effects and Section 6.1 Indirect Effects. See the Biological Assessment Technical Report (ITD 2007a) for details.

Table 52. Threatened and Endangered Species Effects

Common Name	Scientific Name	Federal Status	Action Alternatives' Effects Determination
Canada lynx	*Lynx Canadensis*	Listed Threatened	No Effect
Spalding's catchfly	*Silene spaldingii*	Listed Threatened	Not Likely to Adversely Affect (NLAA)
Water howellia	*Howellia aquatilis*	Listed Threatened	No Effect
Steelhead trout	*Oncorhynchus mykiss*	Listed Threatened	No Effect
Steelhead trout Critical Habitat	*Oncorhynchus mykiss*	Designated Critical Habitat	No Effect

Canada Lynx

The Action Area is located on agricultural land less than 3,000 feet in elevation and is located greater than 20 miles from the nearest potential Lynx Analysis Unit (LAU) (i.e., the Umatilla or Saint Joseph National Forests). Haul roads, staging areas, waste sites, material sources and stockpile sites would not be located within an LAU. The project would have no effect on Canada lynx.

Spalding's catchfly

A population of Spalding's Catchfly was discovered within the project area between Alternatives Modified W-4 and C-3 near Clyde Hill; however, no plants are in the footprint of the alternatives. All of the alternatives have Palouse remnants that occur within a mile of the proposed alignment, which could be indirectly affected. This resulted in a determination that all of the Action Alternatives may affect but are not likely to adversely affect Spalding's Catchfly as a result of indirect effects.

The alternatives could increase weed dispersal to private lands that have been identified as high priority areas for Palouse prairie restoration and a key conservation area for Spalding's Catchfly establishment; however, the alignments would not go through any portion of the properties for which restoration activities are ongoing or planned. In addition, FHWA, ITD, USFWS, NRCS and the Latah County Conservation District have collaborated and future restoration activities

closer to Paradise Ridge and further from the proposed alternatives will be prioritized to minimize the possibility for weed infestation. See Chapter 6, Indirect and Cumulative Effects regarding potential weed dispersal. See the Biological Assessment Technical Report for additional details.

Water howellia

Water howellia occurs in seasonal ponds, often associated with potholes. The only potentially suitable habitat for water howellia in the action area would be the floodplain of the South Fork Palouse River. However, a field survey revealed that the floodplain is under cultivation, channelized and dominated by reed canarygrass, a non-native invasive weed; therefore, the site is not suitable for water howellia. The project would have no effect to water howellia.

Steelhead Trout and Designated Critical Habitat

No steelhead trout or designated or proposed critical habitat for steelhead trout is within the action area. Therefore, this project would have no effect to steelhead trout or its designated critical habitat.

4.10 Transportation Effects

4.10.1 Public Safety

A safety analysis was completed using the First Edition of the AASHTO Highway Safety Manual (ITD 2012a). The results show that all three Action Alternatives will be safer than the existing alignment and the No Action Alternative. The results also show that the E-2 Alternative would be the safest proposed alignment for total crashes, as well as total injury related crashes and fatalities. The Safety Analysis was revised in 2013 to include predicted crashes on the remaining US-95 loop that may be turned over to the NLHD and used for local circulation. An addendum to the Safety Analysis (2013) was prepared to evaluate the Modified W-4 (2015b). Table 53. Projected Crashes for Proposed Alternatives and Remaining US-95 Loop shows the fatal and injury and total crashes in 2017 for each alternative and for 2017 through 2036. The predicted crashes are based on the assumption that the number of approaches does not increase or decrease on any alignment. This will be ensured through ITD's enforcement of the Expressway Access Control for the proposed alternatives. See Sections 2.4.2 for additional information regarding access. The 20-year forecast for crashes was modeled using predicted traffic volumes. See the Revised Safety Technical Report (ITD 2013) and the Addendum to the Safety Technical Report (ITD 2015b) for additional information. Societal costs can be calculated for the predicted accidents using costs of crashes published by the FHWA for different crash types. Due to the shift in the W-4 Alternative, the Safety Analysis was updated to incorporate the Modified W-4 Alternative and the information is provided below. See Table 53. Projected

Crashes for Proposed Alternatives and Remaining US-95 Loop and Table 54. Economic Costs of Crashes 2017 through 2036.

Table 53. Projected Crashes for Proposed Alternatives and Remaining US-95 Loop

Alternative	Total Fatal and Injury Crashes for 2017	Total Crashes for 2017	Total Fatal and Injury Crashes from 2017 thru 2036	Total Crashes from 2017 thru 2036
No Action	11	27.4	256.5	642.5
Modified W-4	5.0	10.5	116.2	244.9
C-3	4.7	11.1	110.0	260.2
E-2	4.4	9.2	100.7	213.9

Table 54. Economic Costs of Crashes 2017 through 2036

Alternative	Cost (million $)
No Action	140
Modified W-4	35
C-3	33
E-2	29.5

All of the Action Alternatives would be designed to meet AASHTO standards. The No Action Alternative would still not meet AASHTO standards.

The two typical sections presented in Exhibit 2. Typical Section: Four-Lane Divided Highway and Exhibit 3. Typical Section: Four-lane Highway with Center Turn Lane and Curb, Gutter and Sidewalk are common to all Action Alternatives. See Section 2.4.2. Design Elements and Typical Section for All Action Alternatives.

The four-lane divided highway sections would have lower predicted crash rates than the four-lane highway with center turn lane, curb, gutter and sidewalk. The center turn lane would allow for two-way left turns, which have a higher predicted numbers of crashes than the highway section with the 34-foot median. The posted speed limit in the urban four-lane section with center turn lane, curb, gutter and sidewalk would be reduced to 35 mph or 45 mph, depending on the alternative. This would mitigate some of the safety factors associated with turning movements.

Table 55. Length of Typical Sections compares the lengths of the two different typical sections by alternative. The four-lane with center turn lane would have approximately three times more predicted crashes than the four-lane divided highway typical section and while it would still operate at a LOS A it would have higher volumes compared to the four-lane divided highway

section. The higher crash rate for the four-lane with center turn lane is primarily due to turning movements from the center turn lane.

Table 55. Length of Typical Sections

Alternative	Length of Four-lane Divided (miles)	Length of Four-lane with center turn lane, curb, gutter and sidewalk (miles)	Total Length of Alignment (miles)
No Action	0	0	6.34
Modified W-4	6.35	0.30	6.65
C-3	4.52	1.42	5.94
E-2	5.61	0.24	5.85

All of the action alternatives would improve the vertical grades through the project area. The approximate grade of the ascent near Reisenauer Hill, (the steepest hill in the project project limits), would range from 3.4 to 4.3 percent and the approximate grade of descent would range from 4.4 to 4.9 percent north of Reisenauer Hill. The Modified W-4 and C-3 alternatives would transition to a rolling hill condition as they approach Moscow. The E-2 Alternative would descend from Reisenauer Hill at a flatter grade and would not pass through the same rolling hill conditions approaching Moscow compared to the other action alternatives. See Table 56. Vertical Grades at Reisenauer Hill. See Table 56. Vertical Grades at Reisenauer Hill.

Table 56. Vertical Grades at Reisenauer Hill

Alternative	Approximate Ascending Grade (percent)	Approximate Descending Grade (percent)
No Action	4.3	6
Modified W-4	3.5	4.9
C-3	3.4	4.8
E-2	4.1	4.4

Weather Conditions

As a result of public concern expressed during the early public involvement process, a report titled Final Report for Weather Analysis of Proposed Realignments of US Highway 95 Thorncreek Road to Moscow (Qualls 2005) was prepared. The study concluded that while there may be minor variations in climatic conditions in the three corridors evaluated, they were unpredictable and not considered substantial. Unpredicted weather occurrences are included in the historical base crash rate data obtained from the safety evaluation manual and are also included as safety factors in the safety analyses.

Since the DEIS was published, clarification and supplemental data was provided in a report titled Weather Analysis and Climate Study for US Highway 95, Thorncreek Road to Moscow, Four

Proposed Alternatives, No-Build, W-4, C-3 And E-2 (Qualls 2014). Information from the revised report was used to update this section to address public comments on specific weather related conditions, elevation and conditions at Reisenauer Hill. Since the report was prepared, the W-4 Alternative was shifted and named the Modified W-4 Alternative; however, since there is no exact boundaries relating weather to the alternatives, the findings related to the W-4 Alternative are valid for the Modified W-4 Alternative.

As stated in Section 3.10 the weather stations were placed in three weather regimes and are referred to the Western, Eastern and Reisenauer Hill corridors. A Central Corridor, which runs in a north-south direction, generally encompasses the existing US-95 and the central alternatives. The West Corridor encompasses the western alternatives, and the East Corridor encompasses the east alternatives. The Reisenauer Hill corridor represents the southern sections of all the alternatives. These corridors are used to describe variations of weather and climate within the study area, but do not have precise boundaries. Except in cases referring to data from satellites and historical accident records on the existing US-95, no attempt is made to specify exact weather or climate conditions for a particular alternative, but instead general corridors are discussed. The Central Corridor does not have a specific weather station; instead the corridor was described based on interpolation of weather data from the eastern and western corridors.

Elevation, Temperature, and Ice. Weather stations were placed at different elevations within the study area to capture the elevation effects. There is an approximately 400-foot difference in elevation between the western corridor and the eastern corridor weather stations with the central corridor being slightly lower in elevation.

Elevations within the study area range from approximately 2540 feet above mean sea level (amsl) to a high of approximately 3000 feet amsl. The elevations within and near the project area are offered for reference:

- Palouse River Drive 2050 amsl
- Western Corridor weather station 2550 amsl
- Eastern Corridor weather station 2950 amsl
- Paradise Ridge 3702 amsl
- Moscow Mountain 4983 amsl

To capture the climate effects at the elevation extremes the weather stations were installed below 2600 feet and at or above 2900 feet. The topography of the region is shown in the Revised Weather Analysis Figure 1.2, Study Area Map (Qualls 2014). Horizontal and vertical grade calculations based on the conceptual level alternatives are included in Appendix 6.

The western corridor weather station was often colder than the higher eastern weather station, by 15 to 20 °F. This is due to cold air drainage, when cold air, which is denser, flows downhill and pools in low elevation areas during unmixed conditions. When the western corridor was colder than the eastern corridor, the average temperature difference is 5.4 °F and the western corridor was colder than the eastern corridor by 12 °F about five percent of the time. This creates greater potential for frost formation, freezing roads, and black ice on low areas of the western corridor compared to most of the length of the eastern corridor.

Temperatures were below freezing at the low elevation western corridor weather station when the higher elevation eastern corridor weather station was above freezing approximately three times longer compared to when the eastern corridor station was below freezing and the western corridor station was above freezing. The observations agreed well with principles of physics and thermodynamics, as well as published scientific studies (Qualls 2014).

Air temperature may decrease with increasing elevation under well-mixed atmospheric conditions (e.g., windy weather or a sunny day with strong solar heating of the ground). Across the 400 feet of elevation difference between the western corridor and the eastern corridor, this averaged about 1.8 °F if only the data when the western corridor was warmer than the eastern corridor are included. This difference exceeds 2.9 °F less than 5 percent of the time. Under these well-mixed circumstances, the eastern corridor at its highest point could average 1.8 °F cooler than the lowest point of the western alternative.

Combining all the data when either the western corridor or the eastern corridor is colder than the other, yields an overall average temperature difference of about 1 °F with the western corridor being colder on average, because of the significantly colder temperatures which occur at the western corridor due to cold air drainage compared to the mildly colder temperatures at the eastern corridor associated with well-mixed atmospheric conditions.

Precipitation and snow accumulation. Most often when snow accumulates, it occurs across the entire study area; however, snow persists longer near Reisenauer Hill than along the middle and northern portion of the study area. All alternatives would be impacted by the persistence of snow in the southern portion of the study area, since all of the action alternatives pass Reisenauer Hill and at least partially descend the north face of Reisenauer Hill with grades ranging from 4.4 percent to 4.9 percent.

The study results show that there will be slightly greater precipitation in the eastern corridor than on the western corridor. . There would be approximately five to seven inches more snowfall per year in the eastern corridor and Reisenauer Hill compared to the western corridor, or a melted snow liquid depth (also called Snow Water Equivalent, SWE) difference of 0.5 to 0.7 inches.

Landsat satellite images of the study area and the surrounding region provide an excellent picture of the spatial distribution of snow. Examples of these images spanning 2002 through 2012 are provided in the Revised Weather Analysis (Qualls 2014). The key findings based on the satellite images are:

1. When there is six to eight inches depth or more at the PSF, the satellite images show coverage over the entire study area and surrounding region by snow.
2. When the snow depth at PSF drops below about six inches during melting, the middle portion (E-2 and C-3 Alternatives) will have patchy conditions. The emergence of these patches is strongly controlled by hill slope orientation. South-facing slopes, which have much greater exposure to the sun, melt off faster than north-facing slopes. The patch quickly spreads westward, and then begins to melt off north-facing slopes in the central area defined above and including west of US-95.
3. Snow persists substantially longer south and east of the ridgeline of Paradise Ridge, including the ridgeline as it passes Reisenauer Hill, which during the winter months is usually the downwind side of the ridgeline. Snow also persists down the north-facing slope of Reisenauer Hill, particularly from the existing US-95 toward the west. Additionally, snow persists on the north end of the study area on north-facing slopes north of Clyde Hill and the east-west power lines of the eastern alignment, though it does not persist there for as long as on either the north face or the south side of Reisenauer Hill.
4. Regional coverage snowfall of a few inches can provide relatively complete coverage of the study area, and it begins to melt off following the pattern described in 2 and 3 above.

The distinction between alternatives considered road alignment characteristics such as length, slopes, and curvature. The E-2 Alternative would descend Reisenauer Hill at a relatively flatter grade further north where there is less snow accumulation. The C-3 and Modified W-4 Alternatives would descend Reisenauer Hill at slightly steeper grades further south than the E-2 Alternative where snow accumulation is greater; however, all action alternatives are designed to meet AASHTO standards and are therefore safe. Vertical grades of the alternatives are further described in Section 4.10.1 Public Safety.

Fog. The western corridor and Reisenauer Hill showed Reisenauer Hill to have the poorest visibility conditions, followed by the eastern corridor and then the western corridor. The Revised Weather Analysis (Qualls 2014) explains that with the exception of one accident related to a tire defect, none of the accidents during foggy conditions occurred at high elevations such as near the top of Reisenauer Hill, where measurements show the worst visibility conditions in the study area. More accidents occurred in mid to low elevation areas of the study area. The report

concluded that fog should not be a primary factor for selecting an alternative, because there were few accidents reported during foggy conditions and other contributing circumstances were reported, specifically, negotiation of tight radii curves in on icy roads. This indicates that the locations of the fog related accidents were controlled by the location of challenging road characteristics (e.g. curve radii and slopes rather than the spatial distribution of reduced visiblitity conditions). Since all roadway alternatives pass Reisenauer Hill, all alternatives will be subject to the poorest visibility conditions of the area. However, with the improved typical section the safety of the Action Alternatives would be greatly improved over the No Action Alternative.

Wind. Wind speeds were similar between all-weather corridors. Measurements at the eastern corridor showed winds were modestly lower than at the western corridor for high wind speeds. The fastest individual gusts and highest average wind speeds were at Reisenauer Hill. Gust speeds of 30 mph or greater correspond to sustained wind speeds of 25 mph or greater. This would be typical of wind speeds warranting a Wind Advisory from the National Weather Service. Gusts generally come from a westerly direction except Reisenauer Hill, which have some gusts up to 38 mph from the east. However, all the alternatives must pass through the Reisenauer Hill area (Qualls 2014). Consequently, the direct effect of wind on vehicles and large trucks should be no worse than existing US-95 for any of the alternatives. The improved typical sections with wider roadways, increased shoulder widths, and medians will greatly improve the safety over existing conditions. There is no detectable difference in wind effects to fill sections between alternatives and weather is already sufficiently considered in the safety analysis. Additional information regarding weather is provided in the Revised Weather Analysis (Qualls 2014).

Microclimates. The local microclimates have been captured through weather station measurements, evaluation of the satellite remote sensing images, consideration of principles of physics and thermodynamics, and published scientific studies.

The weather study included measurements from a weather station installed west of Paradise Ridge on the bench traversed by the E-2 Alternative which represents the eastern corridor. There were also weather stations that collected data for the Reisenauer Hill and the western corridor.

Summary of Findings. All the action alternatives would be an improvement over the No Action Alternative, which has an approximate six percent grade on descent. The Modified W-4 and C-3 alternatives would both descend at least 300 feet on the north side of Reisenauer Hill and include the 3 (Modified W-4) or 4 (C-3) shortest radii curves of the respective alternatives on this descent. E-2 would descend approximately 100 feet with only two, longer radii curves on Reisenauer Hill and make its primary descent further north where snow is less persistent.

The spatial distribution of weather-related accidents on the existing US-95 from Thorncreek Road to Moscow is predominantly associated with the spatial distribution of road characteristics such as tight radii curves located down slope on hills, and ingress/egress associated with road junctions and driveways, rather than due to spatial distribution of weather. Since all proposed alignments are designed to current AASHTO standards, all will result in a great improvement over existing conditions and will be safe. Because the road characteristics, rather than the spatial distribution of weather dominate the distribution of accidents, the prescribed Safety Analysis (ITD 2013) for each of the proposed alternatives, reflects the relative safety between alternatives. The road alignment characteristics such as length, slopes, and curvature, are already considered in the Safety Analysis (ITD 2013).

The findings in the Safety Analyses as they pertain to weather remain valid for the following reasons:

- The five-month data set used to rank the larger 30+ year data set is an accepted method for correlating the data.
- Satellite-based remote sensing of snow cover was collected to further verify conditions.
- A Revised Weather Analysis, *Weather Analysis and Climate Study for US Highway 95, Thorncreek Road to Moscow, Four Proposed Alternatives, No-Build, W-4, C-3 and E-2* (Qualls 2014) has been prepared to incorporate additional data.
- Higher elevations are not always colder and the eastern corridor is more often 10-15 degrees F warmer than the western corridor. The western corridor was sub-freezing while the eastern corridor was above freezing twice as often (3.8 percent) as the converse situation (1.9 percent).
- For this area, cold air drainage frequently results in lower temperatures with associated ice in the lower elevations.
- There is little variability in snow accumulation, fog, wind and microclimates between the western corridor and eastern corridor.

Safety in relation to winter road conditions is more significantly a factor of the steepness of the grades, the curvature, the locations of the descent, amount of north facing slopes, and safety elements in the roadway (Qualls 2014). The small variability in weather conditions and microclimate are mitigated through the improvement of the existing roadway to meet AASHTO standards and is already considered in the assumptions in the Safety Analysis and reflected in the predicted crashes (ITD 2013 and 2015b). Additional information is provided in Sections 3.10 and in the Revised Weather Analysis (Qualls 2014).

Wildlife-related Safety

The frequency of wild animal crashes in the project area is much less than many other sections of US-95 and many other highways in Idaho (Ruediger 2007). In addition, wildlife crashes are not typically severe. Based on the low frequency, randomness and low severity for drivers due to wildlife crashes, they are not considered to be a major contributor to the crash rates (ITD 2013). The improvements to the roadway curvature and grade as well as the wider typical section, would improve the ability for drivers to spot wildlife and maneuver if wildlife enter the roadway (Couch 2010). All of the action alternatives would be designed to AASHTO standards and would be safe.

Wild animal crash potential is expected to be greater on the E-2 Alternative based on opinions of wildlife experts because it would pass through 1.98 miles of low to moderate quality ungulate habitat. Design features such as improved typical sections (i.e. wider roadways with additional lanes, shoulders, clear zones, and wide medians) as well as the straighter alignment and improved sight distance may also mitigate crashes by allowing drivers more time to spot wildlife and react to wildlife (ITD 2013). The use of oversized culverts and wildlife crossings may provide wild animals the opportunity to cross under the roadway and further mitigate the wild animal crash potential.

Sight distance on E-2 is greater than Modified W-4 and C-3 due to its straighter roadway geometry and may offset the higher wild animal crash potential in that corridor caused from E-2 being in an ungulate impact area. Roadside clearing is predicted to greatly reduce wild animal crash potential on all action alternatives, because brush and vegetation where wild animals can hide would be removed close to the highway. This would also improve driver reaction time. The roadside clearing technique was found to reduce wild animal crashes up to 90 percent as described in the Revised Safety Analysis (ITD 2013).

4.10.2 Highway Capacity

This segment of US-95 currently has an ADT of 5,364 and operates at a Level of Service (LOS) C. It would reach an average of 8,524 ADTs by 2037 and would operate at a LOS D, which has restricted movements and delays during peak volume.

The No Action Alternative would have a LOS D. All of the Action Alternatives would add a travel lane in each direction, widen shoulders, clear zones and upgrade the roadway to meet the ITD Design Manual and AASHTO standards. All the Action Alternatives are projected to have a LOS A in both the rural area and urban areas just south of Moscow by the 2037 design year.

4.10.3 Access Effects

Access control on the State Highway System is based on the type of facility, its functional classification, highway safety, vehicle operations, and preservation of highway utilities, zoning, and route consistency. The functional classification would determine the type of access control applied to the highway. With the Action Alternatives, US-95 would be a multi-lane principal arterial with a rural functional class.

This segment of existing US-95 is designated as Statewide Access Control. The proposed Action Alternatives were re-designated as Expressway Access Control within the project limits through an Idaho Transportation Board action on January 15 & 16, 2014. (See the Safety Analysis Technical Report for the agenda and board minutes). Expressway Access Control is a segment of a highway designated by the Idaho Transportation Board for use as a through highway, with partially controlled access, accessible only at locations specified by ITD, and characterized by medians, limited at-grade intersections, and high speeds. An existing segment of state highway may only be designated as an expressway if payment is made to adjacent property owners for the restriction of existing access rights [IDAPA 39.03.42].

The FHWA and ITD would purchase access rights in accordance to Idaho Board Policy-4005, which incorporated the recently revised IDAPA rule 39.03.42 *Rules Governing Right-of-Way Encroachments on State Rights-of-Way* and *Management of Department-Owned Property*. The appraiser will perform a before and after appraisal that will specifically address the access. The deed for the properties will specify the access points at specific locations discussed with the property owner stating width, location, and the type of use of the access.

While the District Engineer has the authority to approve a decrease in the spacing requirements for other access types, the Expressway Access Control does not have spacing requirements; therefore, access is allowed only at locations designated by ITD in collaboration with the landowner during the right-of-way process. Existing approaches[18] would be allowed to remain at locations where construction of joint access is not economically justified.

In the event that the Ring Road concept proceeds to design, ITD will coordinate and negotiate with the City of Moscow regarding access. The access to the proposed Ring Road is expected to be through an interchange located at the north end of the project where growth is expected to

[18] IDAPA 39.03.42 definition of approach is a connection between the outside edge of the shoulder or curb line and the abutting property at the highway right-of-way line, intended to provide access to and from said highway and the abutting property. An approach may include a driveway, alley, street road or highway".

occur. An interchange would be the safest type of access and would result in similar effects to safety between the Action Alternatives.

See Section 2.4.2 and Table 76. General Responses to Issues under Access for additional detail.

The Action Alternatives would have fewer accesses onto US-95 compared to existing conditions. See Table 57. Access Types for the types and numbers of access points per alternative.

Table 57. Access Types

Alternative	Field	Residential	County Road	Commercial	Total Access Points
No Action	14	28	7	17	66
Modified W-4	17	10	4	5	36
C-3	11	14	5	17	47
E-2	9	6	2	5	22

The alternatives would have differing effects to access due to alignments locations.

The No Action Alternative would maintain the existing accesses and would have the highest number of access points of all the alternatives. It would not meet the ITD Design Manual, AASHTO Standards, or ITD's Spacing Policy.

C-3 would have the greatest number of approaches; five public road intersections, the most residential and commercial approaches. E-2 would have the fewest number of public road intersections, residential and commercial approaches.

4.10.4 Mobility Effects and User Cost

All Action Alternatives would shorten the projected travel times through this section of US-95 compared to the No Action Alternative; however, E-2 would result in the greatest travel time reduction. Shortened travel times could improve the economic vitality of the area and could benefit freight transport, emergency service response, school access, bicyclists/pedestrians, and mail delivery. All Action Alternatives would have an overpass structure and would change access onto US-95 at these locations, which could affect travel times (ITD 2013). See Table 58. Overpass Structures and Total Travel Times, which was updated with new information based on the Mobility and Road User Cost Study (ITD 2014a).

Table 58. Overpass Structures and Total Travel Times

Alignment	Overpass Locations	Total Travel Time by 2037 (minutes: seconds)
No Action	None	6:49
Modified W-4	Snow Road	6:16
C-3	Zeitler Road	6:05
E-2	Eid Road	5:31

Source: ITD 2014

Cost of travel time, cost of time related vehicle depreciation, and vehicle-operating costs are components of road user cost that were calculated in the Mobility and Road User Cost Study (ITD 2014a). Crash costs are also a component of road user cost. Table 59. Total Road User Cost shows the total calculated cost over a 20-year period based on all motorists making the entire trip from Thorncreek Road to Moscow. All action alternatives have less travel time than the No Action Alternative, which may be translated to a monetary cost. The E-2 Alternative has the lowest total road user cost. The C-3 and Modified W-4 alternatives are expected to cost approximately 3.5 and 5.5 million dollars more than the E-2 Alternative between 2017 and 2036, respectively.

See the Mobility and Road User Cost Study (ITD 2014a) and the Community Impact Technical Report.

Table 59. Total Road User Cost

Alternative	2017 ($)	2036 ($)	Total 20 Year ($)
No Action	14,600,000	19,700,000	339,000,000
Modified W-4	14,300,000	19,500,000	336,000,000
C-3	13,300,000	18,000,000	311,000,000
E-2	12,600,000	17,200,000	295,000,000

Source: (ITD 2014a; ITD 2014b)
Includes travel time cost, time related vehicle depreciation and vehicle operating costs.

4.10.5 Bicyclists and Pedestrians

Currently the roadway has substandard shoulders and is not striped for bicycles and pedestrian use. All Action Alternatives would improve safety and access for bicyclists and pedestrians by constructing wider shoulders and improving sight distance. The four-lane highway with center turn lane, curb, gutter and sidewalk sections would provide sidewalks that would be designed to meet the Americans with Disabilities Act (ADA) requirements. The C-3 Alternative would have the greatest length of the four-lane with center turn lane, curb, gutter and sidewalks. The

shoulders on the outside lanes of the highway on the rural and urban sections would be shared use but would not be specifically marked for bicycle use.

4.10.6 Emergency Response Time

No need was identified for additional emergency service facilities as a result of construction of any of the alternatives. The ability for emergency service providers to turn around within the project limits to access the on-coming lanes is critical. All of the alternatives would improve the ability to patrol the highway (HDR 2006).

The C-3 Alternative would provide the most convenient access and best emergency response times to the population on the existing US-95, while the E-2 and Modified W-4 alternatives would provide improved access and quicker response times to some of the more outlying areas and cities. The C-3 Alternative would have a longer four-lane with center turn lane section that would allow for easier access and more frequent opportunities to turn around in the urban areas. The E-2 Alternative would have the greatest improvement on mobility (10 percent) (Arnzen pers. comm. 2012). The segments of existing US-95 that may be turned over to the NLHD would be utilized for local circulation and emergency service access.

4.10.7 Safety of Alternatives

No Action

The No Action Alternative would have the highest crash rates of the alternatives. It would include maintenance and minor safety improvements along existing US-95; however, it would not correct the substandard curves and grades, reduce access points or widen shoulders or clear zones. The roadway would still not meet the current AASHTO standards. As ADT's between Thorncreek and Moscow grow and the two-lane highway approaches its capacity, passing opportunities will decrease and crashes on US-95 are expected to increase. Travel times and access for freight, emergency services, postal delivery, schools, and commuting would be longer than current conditions. The No Action Alternative would worsen safety for all users and would not meet the project purpose and need.

Modified W-4

Modified W-4 would be the longest alignment of the alternatives with four proposed public road intersections; Eid Road, Jacksha Road, North Old US-95 and South Old US-95. While the Modified W-4 Alternative is predicted to reduce fatal and injury crashes by more than half of the No Action Alternative, it has the highest fatal and injury crashes of the Action Alternatives from 2017 thru 2036. The Modified W-4 Alternative would have the highest cost to both human life and societal monetary costs associated with crashes of the action alternatives.

C-3

The C-3 Alternative would have the highest predicted total crashes of all the Action Alternatives but fewer fatal and injury crashes than the Modified W-4 Alternative. The greater number of intersections, approaches, and longer suburban section compared to the other action alternatives would create turning traffic across US-95. This would still reduce the predicted crashes by half compared to the No Action Alternative over the 20-year period (2017 through 2036).

It would have the longest suburban five lane section with center turn lanes, which would have higher crash rates than the rural four lane section with a divided median. Crashes for the suburban section are predicted at a rate of 3.4 crashes per mile while the rural four-lane divided section has a predicted rate of 1.1 crashes per mile.

The C-3 Alternative with frontage roads added along the five-lane suburban section was evaluated after the DEIS comment period to determine if safety could be further enhanced. If frontage roads are added to the C-3 Alternative, the five-lane section would be changed to a four-lane section with two-lane frontage roads on each side of US-95 from the top of Clyde Hill to the grain elevators. The C-3 Alternative even considering additional frontage roads would have less safety benefit than the E-2 Alternative. Each frontage road would have two 12-foot lanes with curb, gutter and sidewalk, with a minimum of two-foot shoulders. The width of the C-3 Alternative would increase from 120 feet (for the five-lane section), to 250-300 feet (for the C-3 Alternative with frontage roads). The wider right–of-way footprint would result in approximately $7.2 million additional cost for construction, which does not include the additional right-of-way or relocation costs. Adding the frontage roads would result in greater impacts to 11 businesses, six of which were not originally considered impacted by the C-3 Alternative. There would also be greater impacts to floodplains, prime farmland and more impervious surface compared to the original C-3 Alternative.

Adding frontage roads to the C-3 Alternative would reduce the number of predicted crashes because the length of the five-lane suburban section with a two-way left turning lane would be reduced and the four-lane divided highway would be increased. The five-lane suburban section with a two-way left turning lane generates 3.4 crashes per centerline mile and the four-lane divided highway generates 1.1 crashes per mile. However, the C-3 Alternative would still have a higher crash rate than the E-2 Alternative because it would still have more county road intersections than the E-2 Alternative.

E-2 (Preferred Alternative)

The E-2 Alternative would have the shortest alignment, the fewest public road intersections, the fewest commercial and residential approaches compared to the action alternatives. Furthermore, safety in relation to winter road conditions is more significantly a factor of the steepness of the

grades, the curvature, the locations of the descent, amount of north facing slopes, and safety elements in the roadway (Qualls 2014). The small variability in weather conditions and microclimate are mitigated through the improvement of the existing roadway to meet AASHTO standards and is already considered in the assumptions in the Safety Analysis and reflected in the predicted crashes. Wildlife crashes while predicted to be greater for the E-2 Alternative, may also be mitigated through the improvements of the typical section. However, all action alternatives would meet AASHTO standards and would be safe. E-2 would also have the greatest length of the four-lane divided highway. These factors all contribute to E-2 having the lowest predicted crashes compared to the other alternatives. The E-2 Alternative is predicted to reduce the crash rate of the existing alignment by about 69 percent over the 20-year study period (2017 through 2036).

4.11 Visual Quality Effects

Construction of the US-95 project may have direct effects to visual quality. Effects are likely to occur in locations where construction of the proposed project would affect undisturbed landscapes, in close proximity to sensitive viewers (e.g. residences), and along areas where additional development is proposed. These effects are directly related to new cut and fill slopes, bridges and new linear features created by the road itself (Visual Genesis 2005). Visual quality effects as perceived by the community are discussed in the Community Impact Technical Reports. The W-4 and Modified W-4 Alternatives centerlines are a maximum of 120 feet apart for less than a quarter mile and pass through similar environments; therefore the findings for the W-4 are valid for the Modified W-4 Alternative.

4.11.1 Visual Quality Assessment Findings

Visual effects may vary depending on each person's perception of the view, their values and their perception of the change in the landscape. The degree of visual effects were categorized as low, moderate, moderate high and high as defined below.

Low. These conditions occur where viewers are less sensitive to change or the project follows existing portions of transportation routes or other heavily altered landscapes. Effects may cause no change or minimal change to existing visual resources. These effect levels were established to create a context for evaluating potential effects of alternative alignments to visual resources.

Moderate. These conditions occur where viewers would be sensitive to changes to the landscape, where changes are visible, but the project does not dominate the viewshed. Effects may cause some adverse change to visual resources.

Moderate High. These conditions occur where viewers are sensitive to change to the landscape, changes are moderately visible and they may dominate the viewshed. Effects may be adverse but not substantial.

High. These conditions occur where viewers are sensitive to changes to the landscape, changes may be highly visible, and they may dominate the viewshed. Because these conditions may result in a substantial or substantial change to visual resources, they may warrant mitigation.

Table 60. Visual Quality Effects shows the estimated percentages of visual effects to different visually sensitive areas. See Visual Resources Technical Report for more information.

Table 60. Visual Quality Effects

Alternative	Degree of Visual Effect	Percent of Alignment
No Action	0	0
Modified W-4	Low	11
–	Moderate	58
–	Moderate High	23
–	High	8
C-3	Low	9
–	Moderate	68
–	Moderate High	15
–	High	8
E-2	Low	3
–	Moderate	47
–	Moderate High	25
–	High	25

No Action

The No Action Alternative would only involve minor improvements and would not involve major soil disturbing activities, large structures, and realignments in new areas. Therefore, the No Action Alternative would have no effect to visual quality.

Modified W-4

Modified W-4 would traverse a relatively undisturbed pastoral landscape. Direct effects would occur where residences are within the foreground or middle ground views of other residences and are not screened by terrain. This would occur near the City of Moscow, Snow Road, Jacksha Road, and Thorncreek Road. A new bridge at Snow Road would create a long-term visual effect. During interviews with community representatives during the Delphi Panelist interviews, concern was expressed regarding the W-4 Alternative's light pollution effects on the University

of Idaho Observatory and general visual effects to the University of Idaho Arboretum, surrounding neighborhoods, and planned recreational and residential facilities. This would be similar for the Modified W-4 Alternative.

C-3

C-3 would follow existing US-95 along some of its alignment. It traverses both disturbed and relatively undisturbed pastoral landscapes. Effects are anticipated to occur where US-95 leaves the existing US-95 corridor and is within the foreground and middle ground views of residences and not screened by terrain. This would occur near South Clyde Road, Zeitler Road and near Eid Road. A new bridge at Zietler Road would create a long-term visual effect. This would affect the residential and recreation viewpoints located near the alignment, particularly the residences along Eid Road and the residential developments from near MP 342 to Cameron Road along the northern end of the alignment.

E-2 (Preferred Alternative)

E-2 would traverse both disturbed and relatively undisturbed pastoral landscapes. It would also traverse landscapes along the base of Paradise Ridge and could affect recreational viewpoints from Paradise Ridge and views from the University of Idaho Golf Course. Direct effects are anticipated to occur where US-95 leaves the existing US-95 corridor and is within the foreground and middle ground views of residences and not screened by terrain. This would occur at the residential viewpoints near the City of Moscow, Cameron Road, and Eid Road. A new bridge at Eid Road would create a long-term visual effect to residences. See Exhibit 34. View from E-2 Alignment Near Eid Road (facing north). See the Visual Resources Technical Report for additional detail.

Exhibit 34. View from E-2 Alignment Near Eid Road (facing north)



4.11.2 Community Perceptions

There are strong differing opinions regarding the visual effects of the Modified W-4 and E-2 alternatives. The Citizens for a Safe Highway 95, claiming to represent people collectively owning 80 percent of the land along E-2, were in favor of the E-2 Alternative due to the "spectacular view" of the Palouse and of the City of Moscow for travelers as the route traverses just west of Paradise Ridge. They believe that the beauty of Paradise Ridge could transform the highway into a gateway for Moscow, and that E-2 could promote and preserve the Palouse landscape through scenic highway status. The group opposed the W-4 Alternative stating that it would disrupt westerly views and promote farmland conversion disrupting the agricultural setting (HDR 2005a). This is expected to be similar for the Modified W-4 Alternative.

The Paradise Ridge Defense Coalition, who opposed the E-2 Alternative, felt the expansion of the roadway should follow the existing route as much as possible in order to minimize the ecological footprint of the road. The argument against the E-2 Alternative centered on Paradise Ridge as a unique and valued feature in the community. In the view of those opposed to an E-2 alignment, the ridge should remain untouched because it provides both aesthetic and environmental value as the last remaining natural prairie in the area. As a focal point for community pride, Paradise Ridge serves as a reason both for and against the E-2 Alternative (HDR 2006).

The views of some individual property owners will be impacted differently compared to existing conditions. The visual impacts of the roadway on the community was assessed from various perspectives and illustrated using simulated photographs which replicated the view of each of the three action alternatives from seven locations. The locations were assessed at 30-ft above the ground to provide a "worst case scenario," since none of the locations are expected to have views from that height. See the Community Impact Assessment (HDR 2006) for additional detail (HDR 2006). See Exhibit 35. Community Visual Impacts, Exhibit 36. Community Visual Impacts (Location 1), Exhibit 37. Community Visual Impacts (Location 2), Exhibit 38. Community Visual Impacts (Location 3), Exhibit 39. Community Visual Impacts (Location 4), Exhibit 40. Community Visual Impacts (Location 5), Exhibit 41. Community Visual Impacts (Location 6), and Exhibit 42. Community Visual Impacts (Location 7).

Exhibit 35. Community Visual Impacts

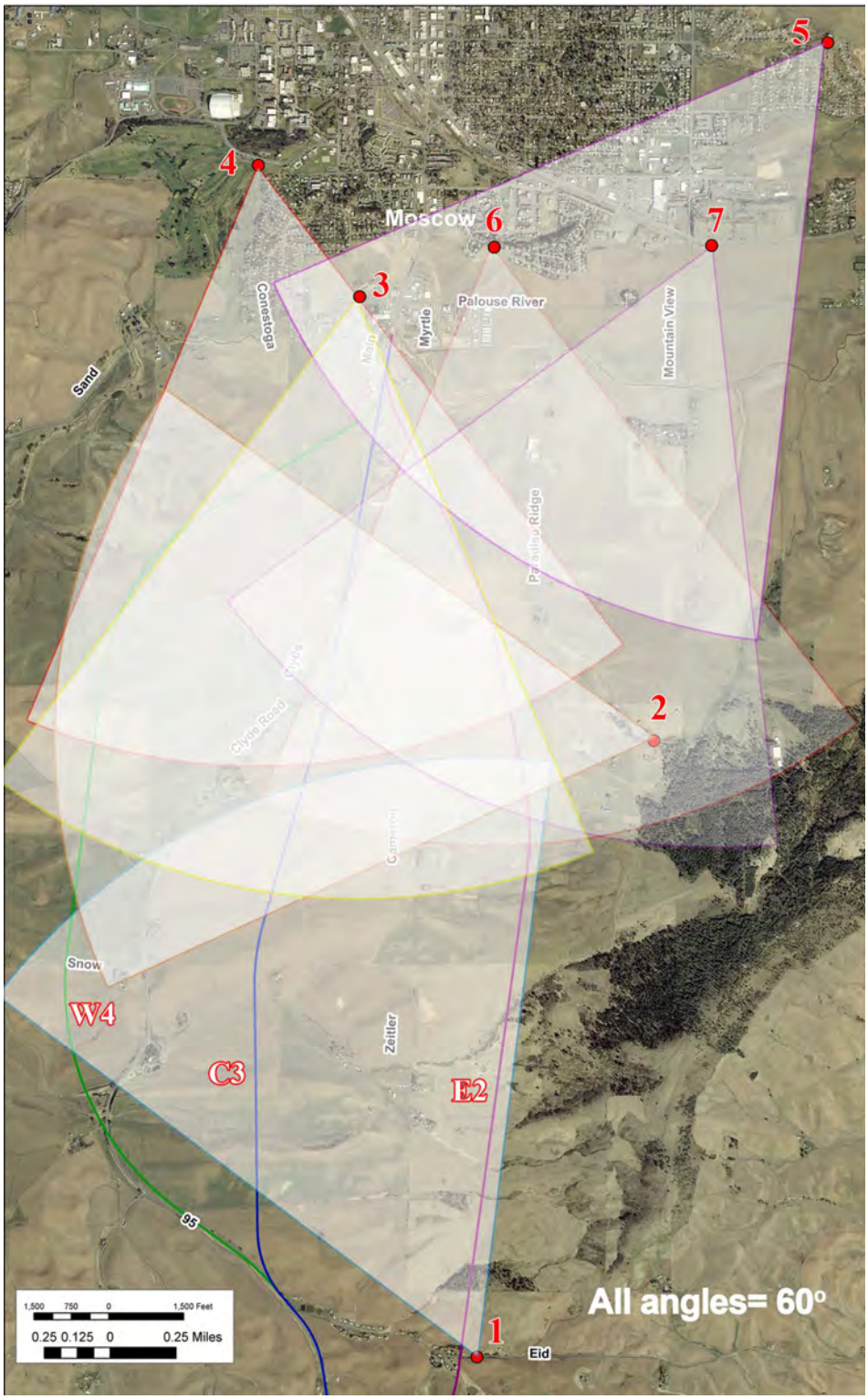


Exhibit 36. Community Visual Impacts (Location 1)

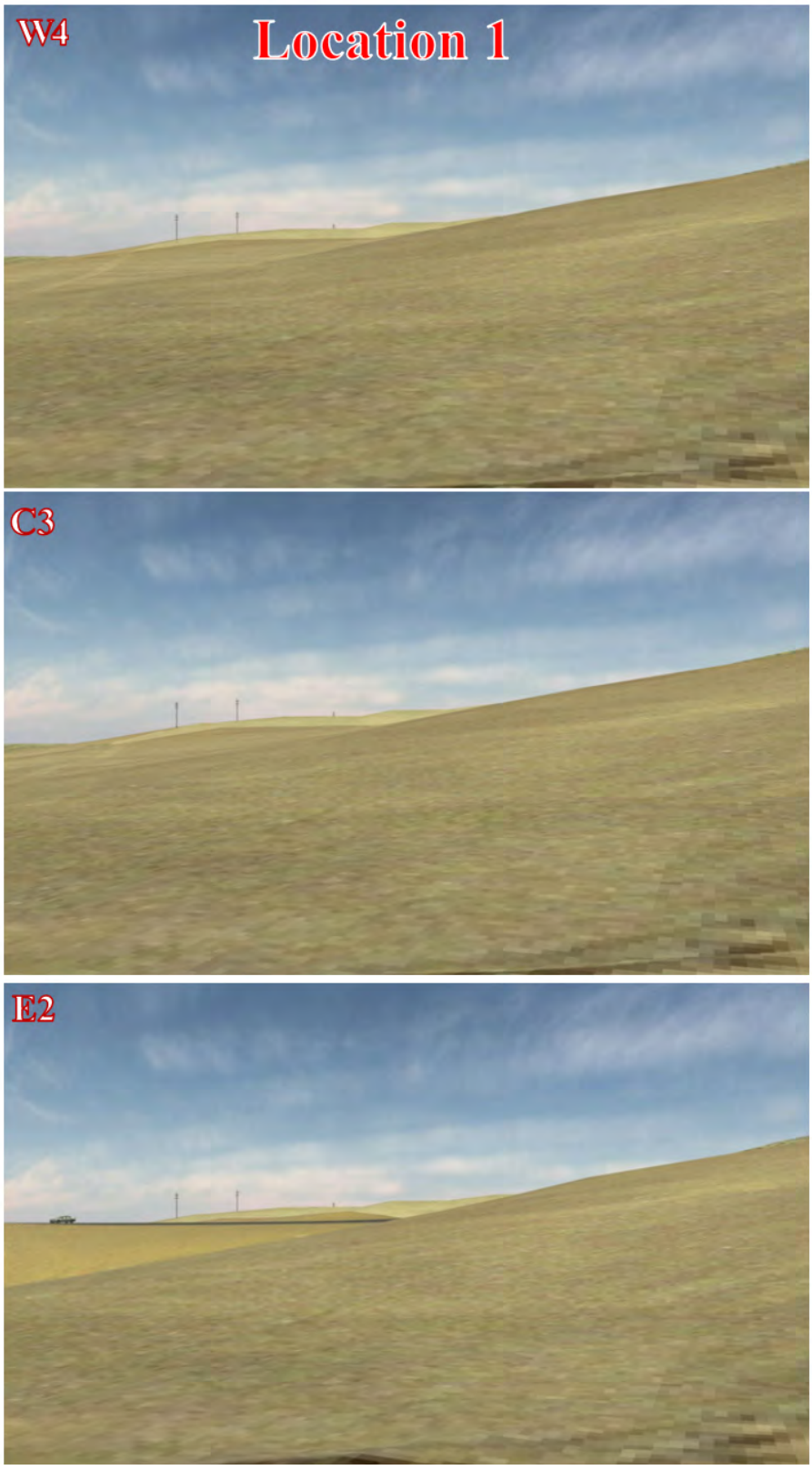


Exhibit 37. Community Visual Impacts (Location 2)

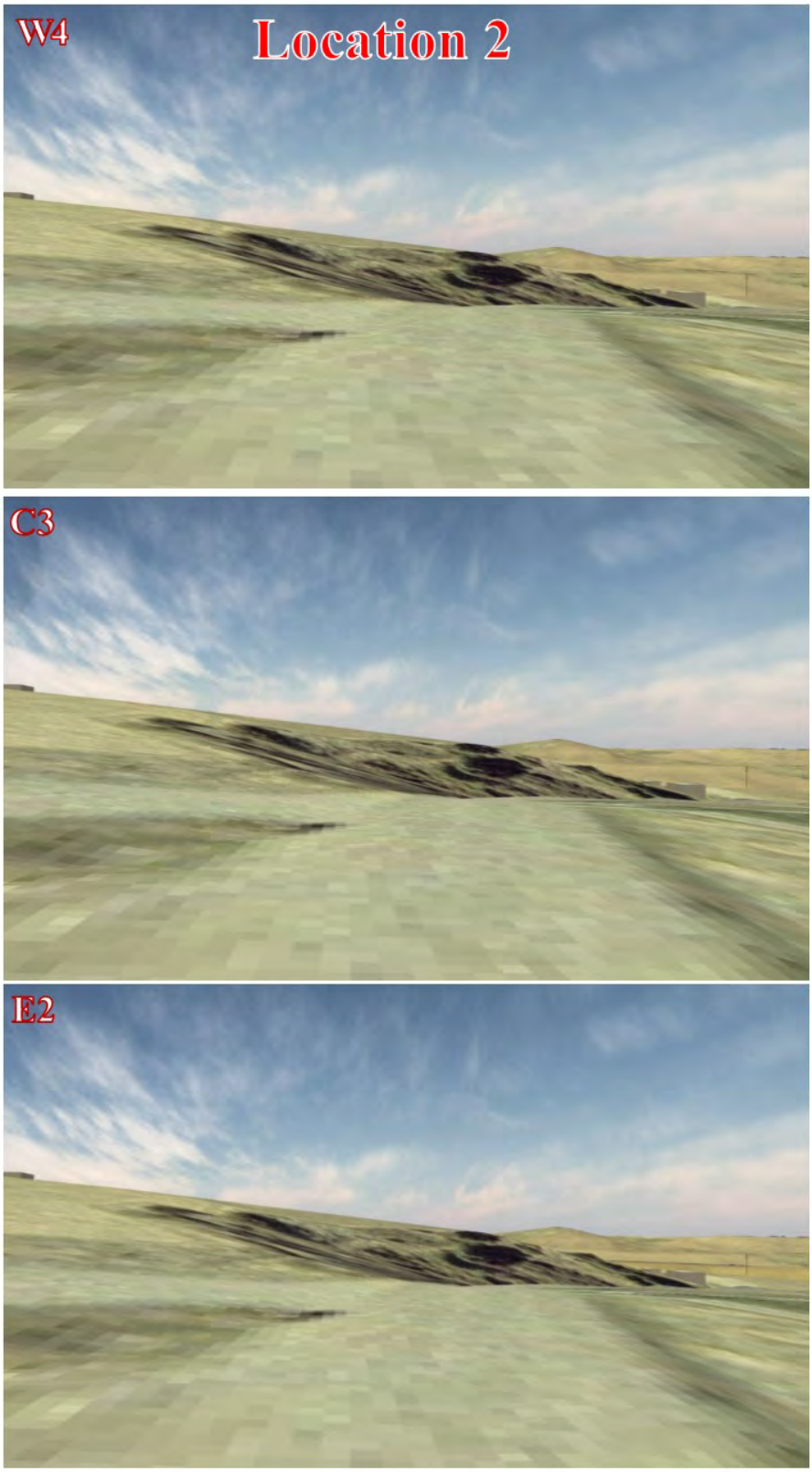


Exhibit 38. Community Visual Impacts (Location 3)

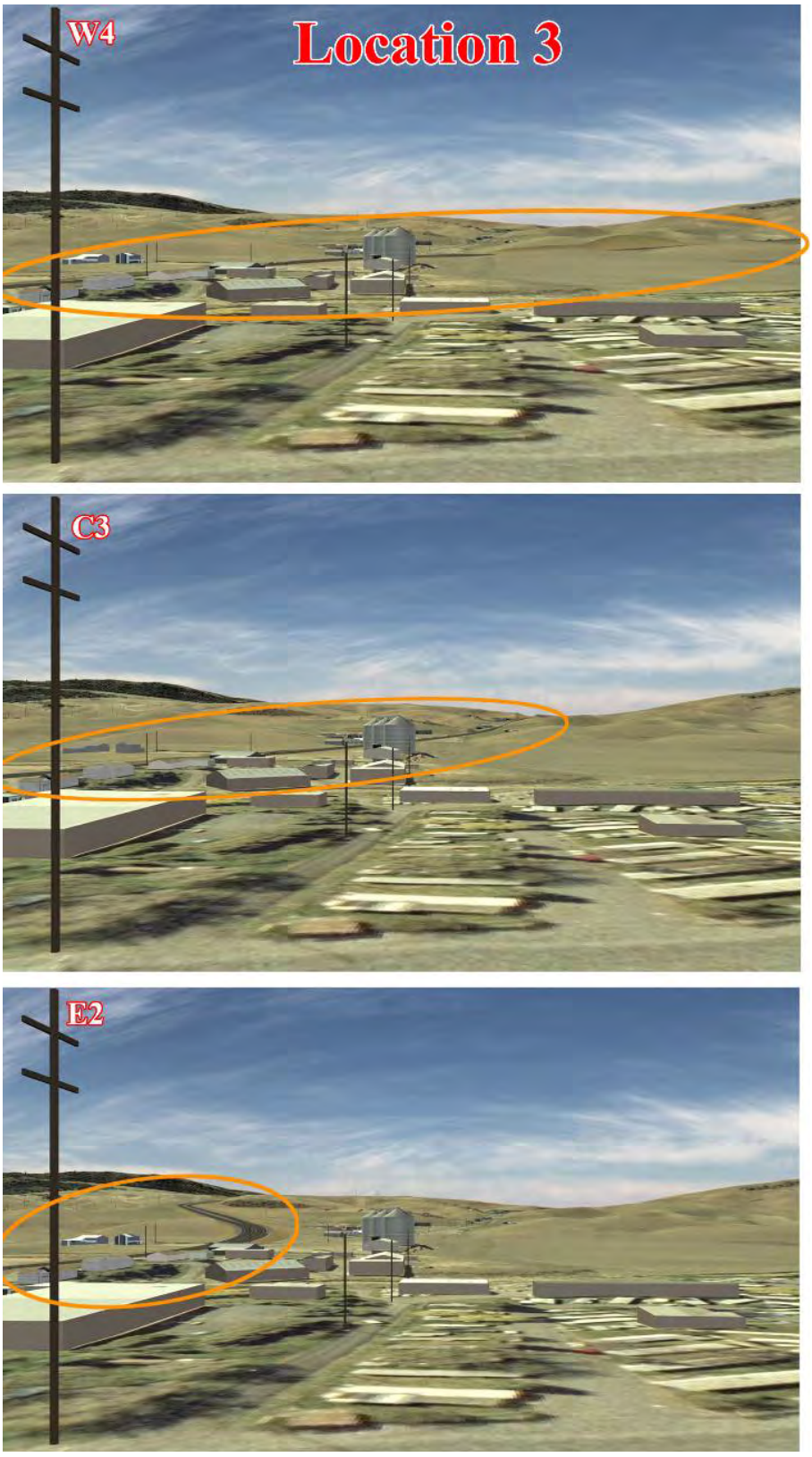
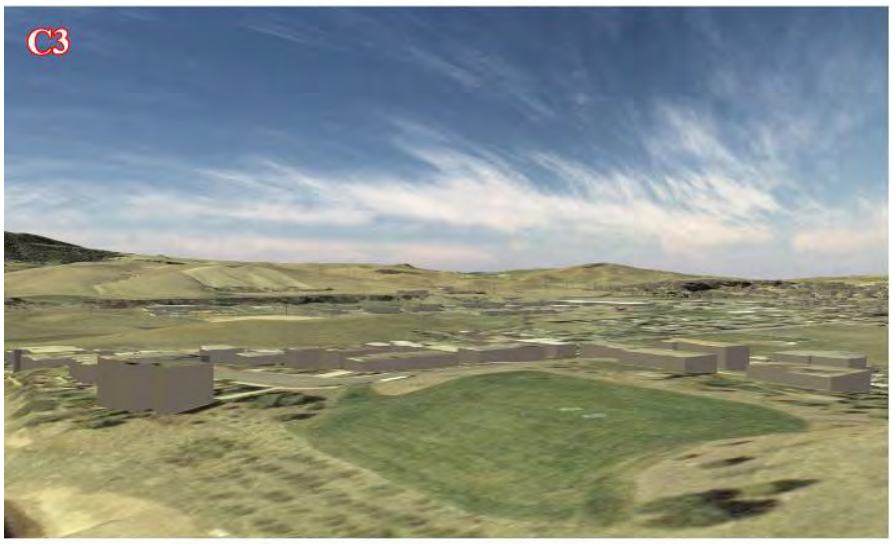


Exhibit 39. Community Visual Impacts (Location 4)



Exhibit 40. Community Visual Impacts (Location 5)





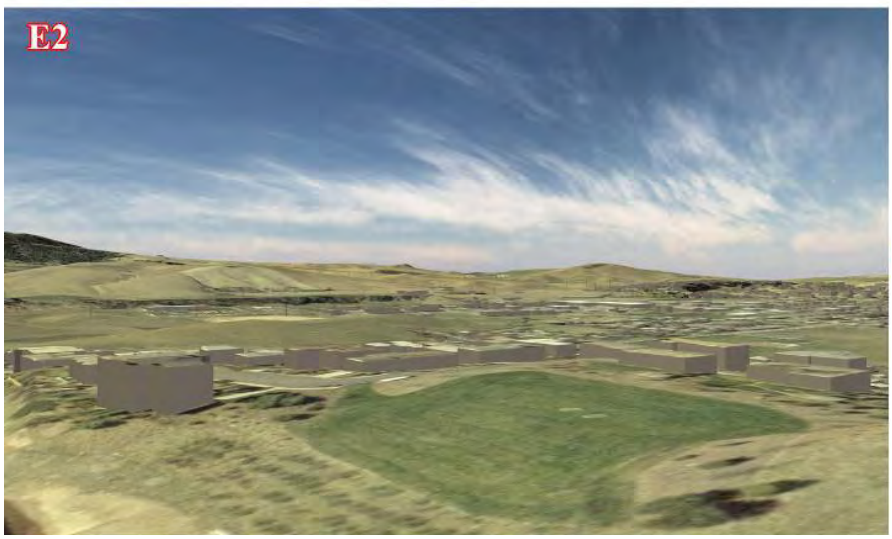


Exhibit 41. Community Visual Impacts (Location 6)

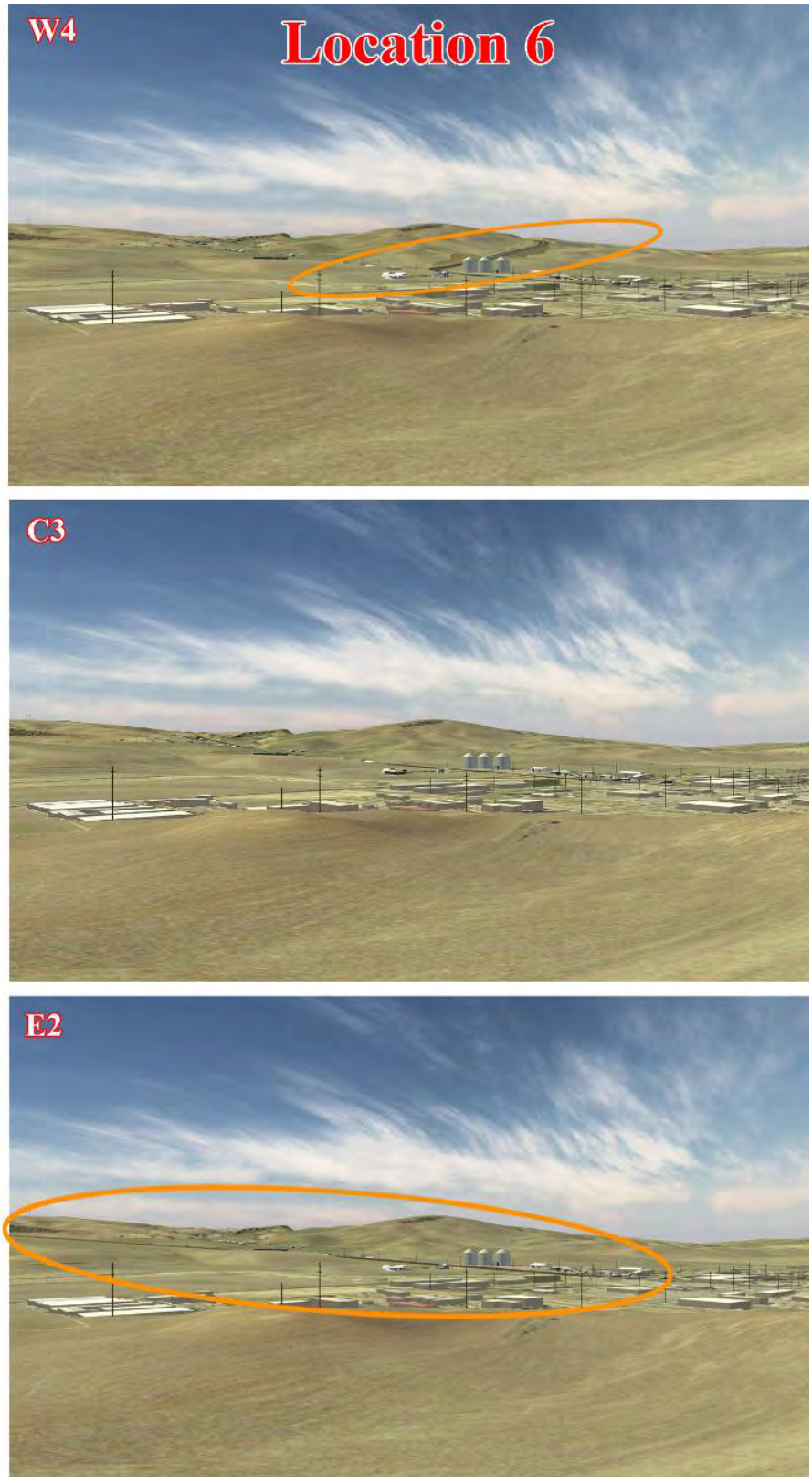
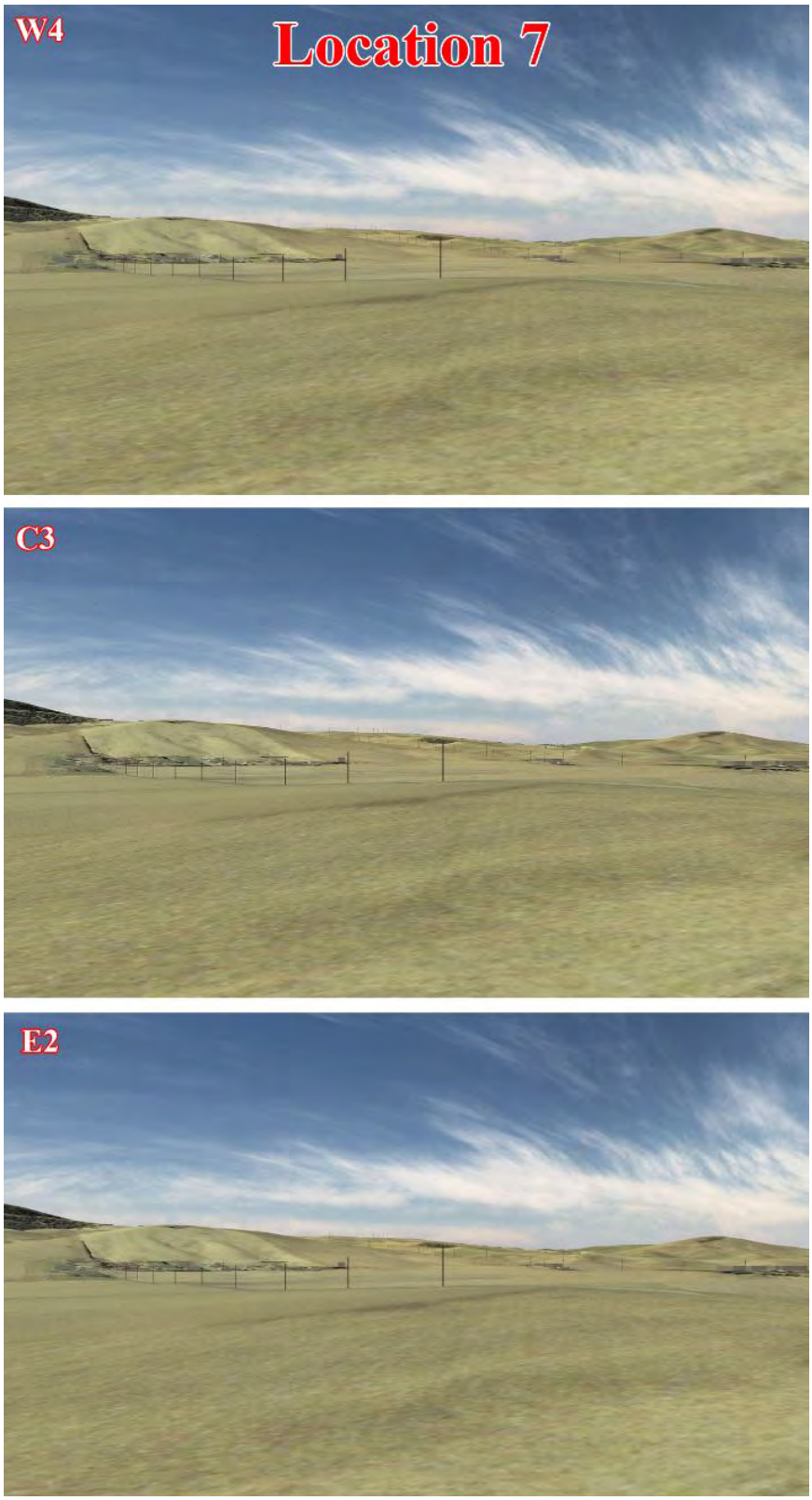


Exhibit 42. Community Visual Impacts (Location 7)



4.12 Traffic Noise Effects

4.12.1 Traffic Noise Impacts

The FHWA has established NAC standards for several categories of land use activities, which are shown in Table 36. FHWA Noise Abatement Criteria (NAC). See Table 61. Predicted Noise Effects. A traffic noise impact occurs when the existing or future noise levels approach (1 dBA below the FHWA NAC) or exceed the FHWA Noise Abatement Criteria (NAC) or when the predicted future traffic noise levels substantially exceed the existing noise levels, even if the predicted noise levels may not approach or exceed the FHWA NAC. The ITD Noise Policy for a substantial increase is 15 dBA over existing conditions, which would be considered over twice as loud to the human ear. A Leq, A-weighted, one-hour, (Leqah) noise measurement is used as the basis to assess the impacts that a roadway has on the sensitive receptors that are located along the proposed road.

Table 61. Predicted Noise Effects

No.	Address	Category	Existing Leq dBA	No Action Leq dBA	2037 Modified W-4 Leq dBA	2037 C-3 Leq dBA	2037 E-2 Leq dBA
1	3336 US 95***	B	59.3	61.2	62.6**	62.5**	62.2**
2	3335 US 95	B	55.6	57.4	59.0	58.5	59.4
3	3379 US 95	B	58.9	60.8	62.1	62.0	61.8
4	3455 US 95	B	57.9	59.8	58.0*	57.1*	41.6
5	3460 US 95	B	55.2	57.1	58	57.6	42.3
6	1010 Eid Rd	B	58.9	60.8	62.3**	62.4**	39.5
7	1071 Eid Rd #3	B	37.2	39.1	39.4	39.5	**56.9****
8	1071 Eid Rd, #5	B	37.3	39.1	39.5	39.6	**57.9***
9	1071 Eid Rd, #7	B	37.2	39.1	39.4	39.4	**58.9***
10	1071 Eid Rd, #9	B	37.1	39.0	39.3	39.3	**62.3***
11	1071 Eid Rd, #8	B	36.9	38.8	39.1	39.1	**60.9***
12	1071 Eid Rd, #2	B	36.9	38.8	39.1	39.2	**59.2***
13	1084 Eid Rd	B	36.8	38.7	39.0	39.1	**57.9***
14	3621 US 95	B	58.2	60.0	60.5*	38.5	32.9
15	3625 US 95	B	55.4	57.3	**69.7***	38.5	32.9
16	1005 Zeitler Rd	B	58.4	60.3	45.1	41.2	33.7
17	Undeveloped	G	34.5	36.3	35.3	38.5	42.7
18	Undeveloped	G	38.9	40.8	52.7	36.2	32.2
19	3672 US 95	B	60.1	62.0	42.9	40.7	33.7
20	3693 US 95	B	61.8	63.7	41.9	40.3	34.0
21	3125 US 95	B	54.5	56.4	41.8	40.2	34.0
22	3096 US 95	B	61.5	63.4	39.5	44.3	35.0

No.	Address	Category	Existing Leq dBA	No Action Leq dBA	2037 Modified W-4 Leq dBA	2037 C-3 Leq dBA	2037 E-2 Leq dBA
23	3094 US 95	B	63.7	65.6	39.5	44.4	35.0
24	3098 US 95	B	**67.1**	**69.0**	39.7	44.0	34.9
25	3082 US 95	B	60.7	62.6	39.4	44.8	35.1
26	3080 US 95	B	62.5	64.4	39.4	44.8	35.1
27	3060 US 95	B	62.6	64.5	39.1	45.7	35.4
28	3055 US 95	B	58.7	60.6	39.5	44.4	35.3
29	3045 US 95	B	59.4	61.3	39.0	44.8	35.9
30	3015 US 95	E	65.8	67.7	38.6	47.3	36.6
31	2979 US 95, #22	B	**66.7**	**68.6**	38.3	49.2	36.9
32	2979 US 95, #23	B	63.7	65.6	38.3	49.6	37.0
33	2979 US 95, #20	B	59.1	61.0	38.4	48.4	36.8
34	2979 US 95, #21	B	57.1	59.0	38.4	48.3	36.9
35	2979 US 95, #24	B	57.3	59.2	38.3	48.6	37.0
36	2979 US 95, #26	B	60.2	62.0	38.3	49.7	37.1
37	2979 US 95, #25	B	**67.0**	**68.9**	38.2	50.7	37.1
38	2979 US 95, #03	B	63.8	65.7	38.2	50.6	37.2
39	2979 US 95, #05	B	59.8	61.7	38.2	50.5	37.3
40	2979 US 95, #02	B	62.8	64.7	38.1	52.2	37.4
41	2979 US 95, #01	B	63.2	65.1	38.1	52.7	37.5
42	2949 Clyde Rd	B	58.5	60.4	38.1	52.5	37.6
43	2946 US 95	B	62.3	64.2	37.7	**69.0***	38.7
44	2936 US 95	B	59.6	61.5	37.7	60.1	39.2
45	2940 US 95	B	59.2	61.1	38.1	59.4	38.6
46	2922 US 95	B	**67.7**	**69.6**	38.1	64.8	39.4
47	2921 Cameron Rd****	C	**67.1**	**69.0**	38.3	64.1**	39.7
48	2921 Cameron Rd****	C	**67.2**	**69.1**	38.3	64.1**	39.7
49	2921 Cameron Rd****	C	**67.4**	**69.3**	38.4	64.2**	39.7
50	2921 Cameron Rd****	C	59.2	61.1	38.2	58.1**	39.9
51	2921 Cameron Rd****	C	59.2	61.1	38.2	58.0**	40.0
52	2921 Cameron Rd****	C	59.0	60.9	38.1	57.9**	39.9
53	2880 US 95	B	65.5	**67.4**	39.1	62.9**	40.5
54	2880 US 95	F	65.4	67.3	39.0	62.8**	40.5
55	2860 US 95	F	64.4	66.3	39.0	62.3**	40.7
56	2850 US 95	F	65.9	67.8	39.2	63.3**	40.8
57	2848 US 95	B	65.8	**67.7**	39.4	63.6**	41.1
58	2845 US 95	B	59.8	61.7	39.8	60.3**	40.3

No.	Address	Category	Existing Leq dBA	No Action Leq dBA	2037 Modified W-4 Leq dBA	2037 C-3 Leq dBA	2037 E-2 Leq dBA
59	2820 US 95	F	65.3	67.2	39.8	63.4**	41.6
60	2822 US 95	B	55.7	57.6	39.7	55.7	42.4
61	2805 US 95	B	60.4	62.3	41.0	60.7	41.7
62	2740 US 95	F	59.0	60.9	43.0	58.6	45.8
63	2726 US 95	F	58.5	60.4	46.2	57.3	49.0
64	2720 US 95	F	64.0	65.9	52.0	62.4	52.2
65	2710 US 95	F	61.6	63.5	49.5	60.1	51.0
66	2670 US 95	F	64.4	66.3	54.6	62.8**	54.0
67	2650 US 95	F	64.8	66.7	56.3	63.2**	54.9
68	2650 US 95	F	66.1	68.0	59.2	64.5**	56.8
69	2551 US 95	F	62.2	64.1	62.4	60.8	54.9
70	2555 US 95	F	54.8	56.7	54.3	54.0	53.1
71	2500 US 95	B	54.5	56.4	54.3	53.8	57.8
72	2305 US 95	F	63.2	65.1	61.6	61.6	60.4
73	2205 US 95	F	62.8	64.7	61.4	61.4	60.7
74	2205 US 95	B	61.4	63.3	60.5	60.4	60.3
75	2113 US 95	F	59.6	61.5	59.7	59.3	59.7
76	2113 US 95	B	56.2	58.1	57.6	56.6	57.8

Bolded numbers indicate a noise impact

*Receptor/residence will be impacted by the project right-of-way and assumed to no longer exist after project construction. These are not considered in the totals for noise-impacted receptors.

Residential or business structure(s) potentially impacted by the project right-of-way but residence or business assumed to exist after construction.* Only garage is impacted by the project. Residence is assumed to remain.

****Receptors 47-52 are Green Acres RV Park spaces and considered one business impact.

The details regarding predicted noise levels at receptors by 2037 are shown in in Table 61. Predicted Noise Effects. Table 62. Summary of Noise Effects summarizes the noise impacted receptors by alternative.

Several noise receptors (residences and businesses) may be physically impacted or potentially impacted by project right-of-way. The noise receptors that are physically impacted by right-of-way are assumed to no longer exist after project construction. Potentially impacted receptors (residences and businesses) could result in removal of residential or business structures but not the actual residence or business. These receptors are assumed to be present after the project is constructed. In addition, four empty trailer spaces, a garage and a shop were considered as potential residential or business impacts but they are not included as noise receptors and therefore not listed under this section.

If the residence or business impacts would approach or exceed NAC but would result in relocation due to right-of-way impacts, it was not counted as noise impacted receptors as they would no longer exist after project construction. Residential and business impacts will be determined more accurately during the design process when more detailed topography, design detail and survey data are available. This is indicated with the astrices in the table below.

The seven noise impacted receptors for the E-2 alignment would result from substantial increases from the existing noise levels of 15 dBA or more. Six of these noise-impacted receptors are impacted and removed due to right-of-way acquisition. The remaining receptor (Receptor 7) would be impacted by traffic noise and would remain after construction.

The Modified W-4 and C-3 alternatives would have no remaining noise impacted receptors after construction. Receptor 18 shows a substantial increase with the Modified W-4 alignment, however it is a Category G receptor, undeveloped and unplatted lands; therefore it has no NAC threshold and is not considered an impact.

Table 62. Summary of Noise Effects

Alternative	Number of Noise Impacted Receptors in 2037 (number of impacted receptors after ROW acquistion)
No Action	9
Modified W-4	1* (no noise impacted receptors would remain after construction)
C-3	1* (no noise impacted receptors would remain after construction)
E-2	7** (one noise impacted receptor would remain after construction)

*This receptor exceeds FHWA NACs but is impacted by ROW and would no longer exist.
** Six of these impacted receptors are residences impacted by ROW and would no longer exist.

Compression brakes could be used on the prominent hill descents and increase noise for any of the alternatives.

4.12.2 Traffic Noise Abatement

23 CFR 772 requires that if a noise impact is identified then noise abatement must be considered. Measures which are determined to be both reasonable and feasible should be incorporated into

the project. The ITD Traffic Noise Policy uses Noise Barrier Abatement Checklists and Noise Abatement Decision Checklists as the basis for determining if traffic noise abatement measures are reasonable and feasible. The checklists are included in the Traffic Noise Technical Report.

The required considerations for abatement include:

- Acquisition of property rights for construction of noise barriers
- Construction of noise barriers
- Noise insulation of public use or non-profit institutional structures

Optional considerations for abatement include:

- Traffic management measures
- Alteration of horizontal and vertical alignments
- Acquisition of real property or interests therein for buffer zones

The required and optional abatement measures were not considered feasible and reasonable for the impacted receptors. However, any future receptors should be required to adhere to setback regulations deemed appropriate by the local jurisdiction. The remaining receptor that is not impacted by the E-2 Alternative right-of-way, receptor 7, is located along Eid Road. The E-2 Alignment would be on an elevated bridge structure near the receptor. Construction of a noise wall on the bridge structure would be feasible but would not be reasonable based on the cost benefit calculations. See the Traffic Noise Technical Report for details.

4.13 Air Quality Effects

4.13.1 Air Quality

The project is not within a federally designated air quality non-attainment or maintenance area, nor is it within an IDEQ air quality area of concern. Therefore, the project has minimal likelihood of exceeding federal air quality standards.

4.13.2 Mobile Source Air Toxins (MSAT)

The realigned and additional travel lanes resulting from the Action Alternatives would move some traffic closer to nearby homes, schools, and businesses. Therefore, each alternative may have localized areas where ambient concentrations of MSAT could be higher than the No Action Alternative. The localized increases in MSAT concentrations would likely be most pronounced along the realigned roadway sections that would be built as part of alternatives Modified W-4 and E-2. The magnitude and the duration of these potential increases resulting from the Action

Alternatives compared to the No Action Alternative cannot be reliably quantified due to incomplete or unavailable information in forecasting project-specific MSAT health effects.

Effects could be offset with increased speeds and reduced congestion that is associated with lower MSAT emissions for the Action Alternatives. Also, MSAT would be lower in other locations such as near the existing US-95 alignment when the majority of the traffic shifts away from most of the sensitive receptors in the area. On a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, would over time, in almost all cases, cause region wide MSAT levels to be significantly lower than today.

4.13.3 Greenhouse Gas Emissions (GHG)

While there are no accurate methods for predicting project effects to climate change, climate change is believed to be associated with the emissions of greenhouse gases (GHG) such as CO2. GHG emissions, including CO2, are directly related to energy consumed. Surface transportation-related emissions can be related to VMT. Table 63. Estimated Vehicle Miles Traveled (VMT) shows the calculated and projected VMTs for the No Action and Action Alternatives. Fuel consumption by alternative is in Section 4.15 Energy Effects.

Table 63. Estimated Vehicle Miles Traveled (VMT)

Alternative	Existing 2010 VMT	Projected 2037 VMT
No Action	34,008	54,042
Modified W-4	35,671	56,685
C-3	31,862	50,633
E-2	31,433	49,951

E-2 is expected to have the lowest projected VMT and to generate the least amount of GHGs by 2037. E-2 would result in a 7.6 percent decrease in VMTs compared to the No Action Alternative.

Examples of strategies being implemented to reduce GHG levels include providing alternatives to driving alone (such as carpooling, vanpooling, and transit); developing transportation facilities that encourage transit, high-occupancy vehicle (HOV), bike, and pedestrian modes; supporting land use planning and development that encourage such travel modes (such as concentrating growth within urban growth areas); and optimizing system efficiency. While the project would not preclude implementation of these strategies, due to the rural nature of the project area they are not included as part of the project alternatives.

4.14 Hazardous Materials Effects

The Hazardous Materials Scan prepared for the project identified sites with Underground Storage Tanks (USTs), Aboveground Storage Tanks (ASTs), and other sites containing hazardous materials and requiring cleanup. Table 64. Hazardous Material Sites Effects summarizes the effects by alternative. Exhibit 43. Hazardous Material Site Effects shows the location of the hazardous material sites relative to the Action Alternatives. See the Hazardous Materials Technical Report for more detail. Mitigation measures are discussed in Chapter 9, Environmental Commitments.

Table 64. Hazardous Material Sites Effects

Alternative	Number of Affected Sites	Location and Description of Affected Sites
No Action	0	None
Modified W-4	4	Four 200 to 500 gallon tanks with propane or petroleum
		3460 Hwy 95 (Private-propane)
		2500 Hwy 95 (Private-AST*)
		2211 Hwy 95 (Boat shop-removed UST**)
		1010 Eid Rd (Private-propane)
C-3	13	Thirteen properties with 200-500 gallon tanks with propane, petroleum or oil tanks. The Goodman Oil property also has 3 bulk storage ASTs and a subsurface plume could be affected if acquired.
		3460 Hwy 95(Private-propane)
		2500 Hwy 95 (Private-AST)
		2211 Hwy 95 (Boat shop-removed UST)
		2710 Hwy 95 (Gary's Heating & Oil-petroleum)
		2710 Hwy 95 (Goodman's Oil-Petroleum pumps & AST)
		2922 Hwy 95 (Johnson's Trucking-UST & AST)
		2880 Hwy 95 (Mr. Cabinet Mfg.-propane)
		2850 Hwy 95 (Private-propane)
		2848 Hwy 95 (Upholstery shop-propane)
		2820 Hwy 95 (Private-propane)
		2650 Hwy 95 (Business-propane)
		Hwy 95 (Mundy's Machine and Welding-propane)
		1010 Eid Rd. (Private-propane)
E-2	4	Four 200-500 gallon tanks with propane or petroleum
		2500 Hwy 95 (Private-AST)
		2211 Hwy 95 (Boat shop-removed UST)
		1071 #7 Eid Rd. (Private-propane)
		1084 Eid Rd. (Private-propane)

*AST=Aboveground Storage Tank ** UST=Underground Storage Tank

No Action

The No Action Alternative would not require right-of-way acquisition or major construction. Therefore, there would be no effects to hazardous material sites.

Modified W-4

This alternative would affect four sites, primarily ASTs associated with farms and residences such as propane tanks and petroleum tanks of 500 gallons or less. These would be properly handled and disposed of during right-of-way acquisition and would pose a low risk.

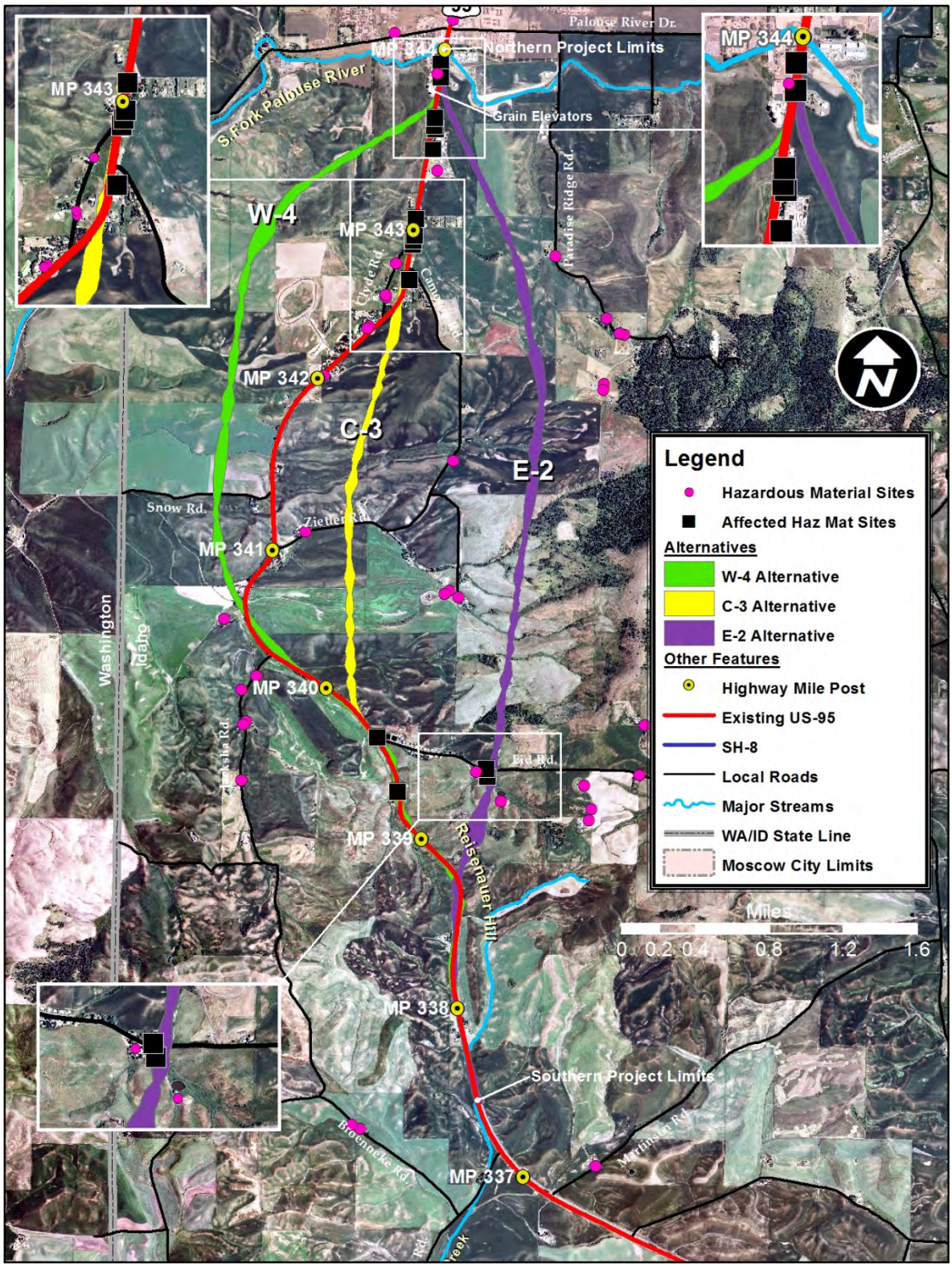
C-3

C-3 would affect 13 sites, one of which is Goodman Oil, a listed site with a contaminated plume. This would need to be remediated if acquired. Acquisition, liability and remediation of this site would result in greater cost but it would result in an environmental benefit after the clean up or abatement. Goodman Oil would pay the cost of cleanup but the liability for cleanup could also transfer to ITD if ITD purchases it. The remaining sites are low risk because there are no records of leakage and they are easily visible.

E-2 (Preferred Alternative)

E-2 would affect four sites, primarily ASTs that contain primarily propane or petroleum in tanks of 500 gallons or less. These would pose a low risk to the project because they are not leaking and are easily visible. The vast majority of homes built before 1950 contained substantial amounts of lead-based paint. Due to the age of many of the existing structures there is the potential risk of lead-based paint and asbestos contained in the structures that would be demolished by each alternative.

Exhibit 43. Hazardous Material Site Effects



4.15 Energy Effects

The alternatives are expected to result in slightly different operational energy usage. The alignments presented have been designed utilizing the same criteria. All have a posted speed of 65 mph in the rural section and 35 mph or 45 mph, depending on the alternative, at the north end, in the urban section. All alternatives would traverse the rolling terrain of the Palouse and have similar maximum grades and curvature for the purposes of estimating energy usage.

Operational energy usage by alternative was estimated by projecting the alternatives' ADTs for the 2037 design year then calculating the projected VMTs. The fuel usage per alternative was based on vehicle type (heavy truck or passenger vehicle) consumption rates and the highway length for each alternative. Table 65. Estimated Operational Energy Use summarizes the results per alternative.

Table 65. Estimated Operational Energy Use

Alternative	Alternative Length (miles)	Projected 2037 VMT	Projected 2037 Fuel Use (gal/day)
No Action	6.34	54,042	2,939
Modified W-4	6.65	56,685	2,955
C-3	5.94	50,633	2,753
E-2	5.86	49,951	2,716

Total fuel consumption for this segment of US-95 is currently estimated to be 1,773 gallons per day. The No Action Alternative is estimated to utilize 2,939 gallons of fuel per day by the 2037 design year. Based on the results, E-2, which is the shortest alignment, would result in the least fuel usage through the project corridor.

ITD will negotiate the transfer of the remaining US-95 loop to the NLHD who will be responsible for the safe maintenance of the roadway. NLHD budgets consist of revenues from local, state and federal funding sources which are used for road maintenance, such as plowing, dust control, equipment maintenance and labor costs. The existing US-95 loop will be within the county road system and traffic volumes will decrease by 95 to 97 percent compared to current volumes. Significantly lower traffic volumes will result in less maintenance. NLHD already travels US-95 to access country roads for snow removal so snow removal energy for mobilization is not expected to rise dramatically.

4.16 Relationship between Local Short-Term Uses of the Environment and the Maintenance and Enhancement of Long-Term Productivity

Council for Environmental Quality (CEQ) NEPA Regulations [40 CFR 1502.16] requires discussion of the "relationship between short term uses of the environment and the maintenance and enhancement of long-term productivity" as part of an EIS. The proposed action was evaluated to determine whether long-term benefits are worth the short-term effects. Short-term effects are anticipated with the construction of any Action Alternative. These include, but are not limited to, travel delays, traffic congestion, restricted access to residences and the commercial establishments in the project area, visual intrusions to residents and motorists, noise to residents and other effects. The C-3 Alternative would have the greatest short-term effects because a greater portion of it is located along existing US-95 and adjacent to businesses and residences resulting in greater delays, congestion, noise, visual effects and access restrictions. The need for short-term and long-term transportation improvements is analyzed in an iterative, on-going planning effort at all levels of government.

The maintenance and enhancement of long-term productivity of resources of an area is based on a number of different factors, including transportation systems. The need for present and future transportation improvements is programmed and analyzed as part of the compilation of the Idaho Transportation Investment Program (ITIP). These plans take into account the requirements for long-term productivity of the transportation system. There would be a long-term benefit to the travelling public due to improved safety and capacity, increased mobility, and maintenance of the long-term economic viability locally, regionally and state-wide due to availability of safe and reliable transportation and reduced road user costs.

The improvement of the aging transportation infrastructure contributes to the maintenance and enhancement of long-term productivity of the communities in the project area and would outweigh the short-term effects. Additionally, US-95 is identified as a NAFTA route, which connects Canada to Mexico through Idaho and other western states, and contributes beyond the local and regional long-term productivity of this community. ITD is committed to mitigating both short- and long-term effects to the environment.

4.17 Irreversible and Irretrievable Commitment of Resources

CEQ's NEPA regulations require discussion of any irreversible or irretrievable commitment of resources in implementing a federally funded project [40 CFR 1502.16]. This applies primarily to use of nonrenewable resources, such as minerals or cultural resources, or to those factors, such as soil productivity, that are renewable only over long periods of time. The irretrievability of those resources applies to the loss of production, harvest, or use of natural resources. The implementation of any of the Action Alternatives would require a commitment of a range of

natural, physical, human, and fiscal resources. The conversion of private land from existing residential, agricultural, commercial, and native habitat uses to public highway is considered an irreversible commitment of resources. Despite that, if at some future time a greater need arises for use of the land or if the proposed public highway is no longer needed, the land could be converted to another use. The Action Alternatives would utilize existing right-of-way (ROW) where possible. Existing ROW would be used to differing extents between alternatives to meet the project purpose and need. See Table 66. Right-of-Way Effects.

Table 66. Right-of-Way Effects

Alternative	New ROW (acres)	Existing ROW (acres)	Total ROW (acres)
No Action	0	0	0
Modified W-4	206	45	251
C-3	154	55	209
E-2	207	22	229

Regarding fiscal resources, the Action Alternatives would require the commitment of funds for constructing, operating, and maintaining the proposed roadway. Funds would be required for right-of-way acquisition, construction, mitigation, and long-term maintenance of the new facilities. Maintenance of the existing US-95 loop would also be required but would be less due to the reduction in traffic volumes on that roadway by 95 to 97 percent compared to existing volumes. The use of public funds for the proposed action would be irreversible and irretrievable. Considerable amounts of labor, fossil fuels, and highway construction materials would be expended and would not be retrievable. Concrete, aggregate materials used in concrete and asphalt production such as sand and gravel, along with steel, water, and bituminous material, would all be used for the proposed action. Additionally, large amounts of labor and natural resources would be used in the fabrication, preparation, and transportation of construction materials. Such expenditures generally are not retrievable. The proposed action has the potential to change land use patterns in the project area by increasing visibility of, and accessibility to, developable land. Such change in land use patterns could result in different effects on the social, built, and natural environment, than otherwise would occur with existing development patterns.

Where historic resources are adversely affected such use would be irretrievable but would be minimized and mitigated. The proposed action also would replace land currently functioning as wildlife habitat, riparian areas, and wetlands with highway lanes and approaches. Where wetlands or floodplains cannot be avoided or effects cannot be further minimized, the proposed action would compensate for lost functions and values through compensatory mitigation. While wetland and floodplain mitigation are intended to create additional wetlands or floodplains that restore functions, the loss of the actual habitat affected is considered irreversible. The

commitment of the aforementioned resources is based on the concept that residents in the immediate area, region and state would benefit from the improved facility, as would NAFTA related travel. These benefits would consist of improved safety, and increased capacity to accommodate current and future traffic demand.

5 SECTION 4F EVALUATION

5.1 Regulatory Framework and Policies

Section 4(f) Resources are governed by the following:

- 23 CFR 774-Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites (Section 4(f))
- 49 USC 303-Policy on Lands, Wildlife and Waterfowl Refuges, and Historic Sites

Section 4(f) of the United States Department of Transportation Act of 1966, codified in Federal law at 49 USC 303, states that "It 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 "The Secretary [of Transportation] may approve a transportation program or project…requiring the use of any publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance (as determined by the federal, state or local officials having jurisdiction of the park area, refuge, or site), only if:

- There is no prudent and feasible alternative to using that land, and
- The program or project includes all possible planning to minimize harm to the park, recreational area, wildlife and waterfowl refuge, or historic site resulting from the use."

Section 4(f) further requires consultation with the Department of the Interior and, as appropriate, the involved offices of the Departments of Agriculture and Housing and Urban Development. Section 4(f) "use" is defined as:

- When Section 4(f) land is permanently incorporated into a transportation facility;
- When there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose; or when there is a constructive use of a Section 4(f) property. Constructive use occurs when the transportation project does not incorporate land from a Section 4(f) resource, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features or attributes of the resource are substantially diminished [23 CFR 774.17].

5.2 Proposed Action and Purpose and Need

The purpose of this project is to improve public safety and increase highway capacity on US-95 south of Moscow between Thorncreek Road (MP 337.67) and the South Fork Palouse River

Bridge (MP 344.00). Within the project limits, US-95 does not meet current American Association of State Highway and Transportation Officials (AASHTO) Standards. The primary deficiencies of the roadway are described in detail in the DEIS, Chapter 1, Introduction and Section 3.10, Transportation.

5.3 Section 4(f) Properties

The Deesten/Davis Farmstead is the only National Register of Historic Properties (NRHP) eligible cultural resource that could be affected by the Action Alternatives presented in the DEIS and is the only Section 4(f) resource considered in this Section 4(f) Evaluation. See Exhibit 44. Deesten/Davis Farmstead as viewed from US-95.

Exhibit 44. Deesten/Davis Farmstead as viewed from US-95



The Deesten/Davis Farmstead (Field #US-95-22) is located immediately west of US-95 and approximately four miles south of Moscow between Zietler Road and Jacksha Road. It consists of eight primary buildings: a farmhouse, garage, barn, granary, chicken house, smoke house, shop, equipment shed and groves of trees. Within the historic site boundary, the property is estimated to be 10.43 acres and is surrounded by actively cultivated Palouse farmland.

The Civilian Conservation Corps planted the two groves of trees in the 1930s. There is also an orchard, cottonwoods, a conifer windbreak and a black walnut tree from Germany. The farm was originally patented to William Plummer in 1882 as a cash entry land claim (BLM 2005) and

is remarkably intact with the house, barn and other primary buildings in good condition with no intrusive modern elements. The property is eligible for NRHP listing under Criterion A, for its association with regional agricultural development. The property is also eligible under Criterion C as an excellent example of early twentieth century farmstead architecture and layout.

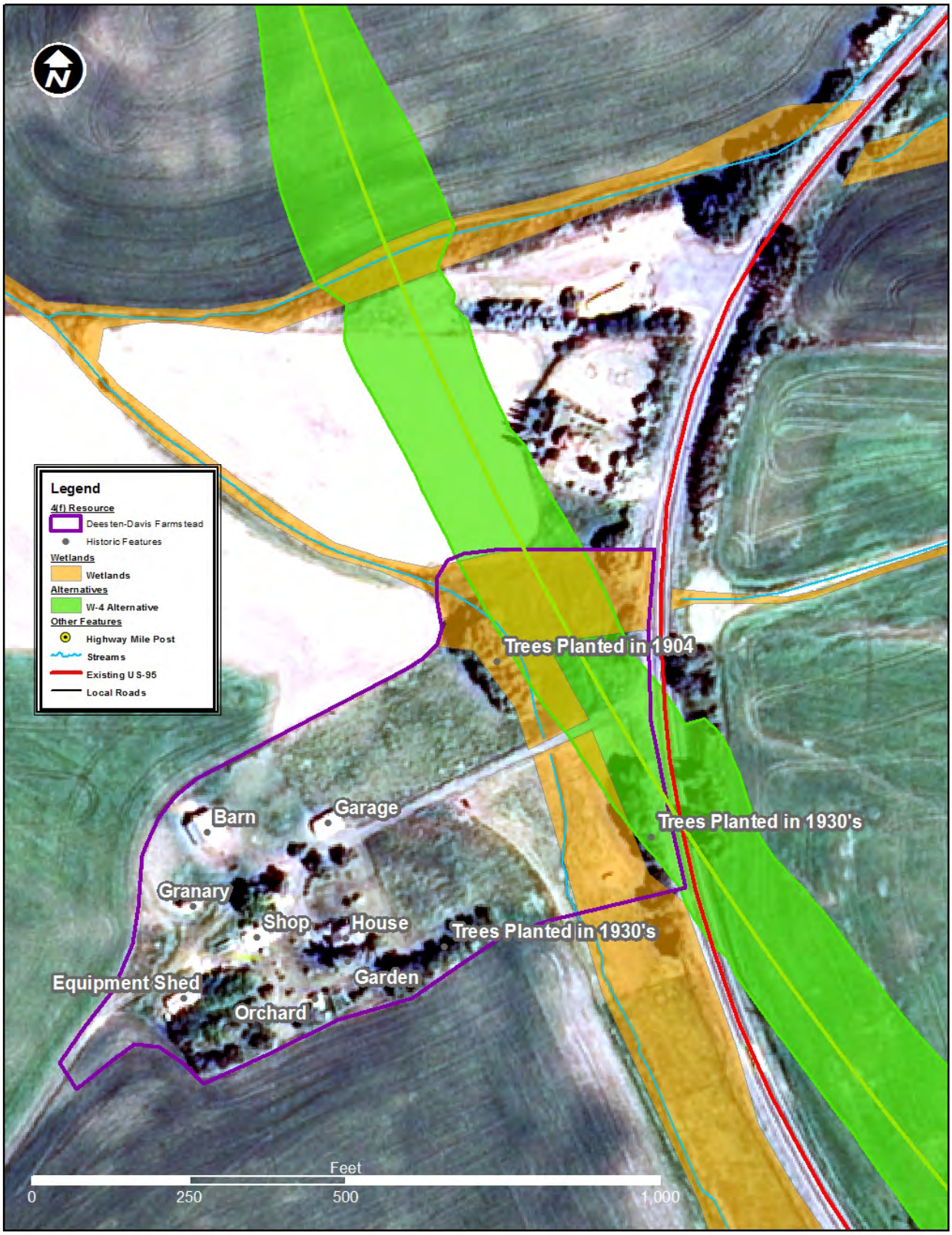
5.4 Section 4(f) Use

The W-4 Alternative as presented in the DEIS would result in an adverse effect to the Deesten/Davis Farmstead under Section 106 of the NHPA and would constitute a use under Section 4(f) of the USDOT Act. The No Action, C-3 and E-2 alternatives would not result in Section 4(f) use.

The DEIS W-4 Alternative would encroach upon approximately 1.73 acres of the Deesten/Davis Farmstead. This encroachment would not adversely affect any of the historic buildings but would remove several of the trees, which were planted in the 1930s by the Civilian Conservation Corps. These trees provide a partial visual screen between the roadway and the farmstead. Removing the trees could alter the views of the farmstead adversely affecting the setting. Acquiring right-of-way and removing the trees would result in a Section 4(f) use.

There are approximately 2.23 acres of Wetland 9 within the boundary farmstead. The DEIS W-4 Alternative would affect 0.84 acres of the wetland located on the farmstead. See Sections 3.6 and 4.6 for a discussion of wetlands. See Exhibit 45. Deesten/Davis Farmstead Section 4(f) Use by DEIS W-4 Alternative.

Exhibit 45. Deesten/Davis Farmstead Section 4(f) Use by DEIS W-4 Alternative



5.4.1 Avoidance Alternatives

Based on the DEIS, the avoidance alternatives would include using either the C-3 or E-2 Alternatives. Shifting the roadway approximately 300 feet to the east in the vicinity of the farmstead would also avoid the historic site boundary. This would require W-4 to follow the existing alignment in this area, which experiences many accidents due to the substandard curvature. Realigning the W-4 Alternative in this location to follow the existing US-95 alignment would not improve the substandard curvature of roadway in that area and while constructible, it would not meet the project purpose and need and would not be prudent.

Modified W-4 Alternative

During the development of the FEIS, the DEIS W-4 Alternative centerline was shifted approximately 120 feet east for approximately 2000 ft to avoid the historic farmstead boundary. This realignment begins south of MP 340 and extends to Snow Road. This alternative is feasible and constructible using accepted engineering standards (AASHTO). This new avoidance alternative is referred to as the "Modified W-4 Alternative". See Exhibit 46. Modified W-4 and DEIS W-4 Alternatives.

The Modified W-4 Alternative is 0.04 miles shorter than the DEIS W-4 Alternative. The safety analysis for the Modified W-4 Alternative shows no substantial difference in projected crash rates and the road user costs would not change noticeably. There would be no severe social, economic or environmental impacts as a result of the avoidance alternative. The primary differences between the W-4 alternatives are shown in Table 66. Comparison of W-4 Alternatives.

As shown in Table 67. Comparison of W-4 Alternatives, the Modified W-4 Alternative compared to the DEIS W-4 Alternative would have slightly more than one less predicted crash, less right-of-way needs, less wetland and floodplain impacts and would avoid cultural resources and Section 4(f) use. However, it would have one additional well impact, one additional impact to a tributary but less stream channel would be affected. It would also have more impervious surface and more prime farmland effects. This avoidance alternative in this location does not result in a severe impact and is prudent.

The Modified W-4, C-3 and E-2 alternatives are feasible and prudent avoidance alternatives; therefore, no further Section 4(f) evaluation or approval is required.

Exhibit 46. Modified W-4 and DEIS W-4 Alternatives

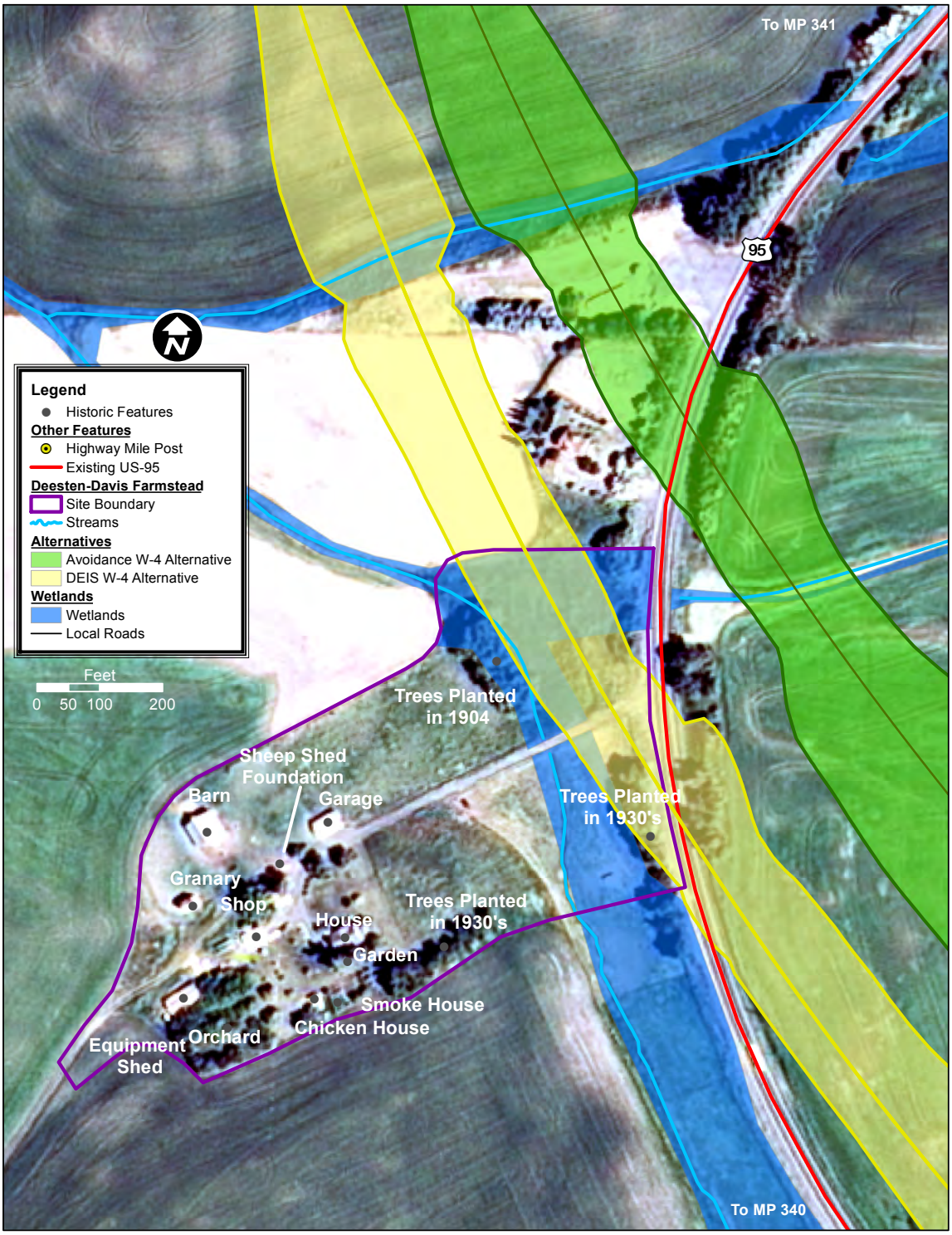


Table 67. Comparison of W-4 Alternatives

Resource	Modified W-4 Alternative	DEIS W-4 Alternative
Length (miles)	6.65	6.69
Predicted Crashes (total crashes 2017 through 2036)	244.9	246.2
Right-of-Way new/existing/total (acres)	206/45/251	210/49/259
Prime Farmland (acres)	49.7	46.7
Cultural Resources/Section 4(f)	0/0	1/1
Impervious Surface (acres) New alignment/New alignment plus US-95 Loop	58/68	57/67
Wells (#)	1	0
Wetlands (acres)	1.85	5.45
Tributaries (#/length (ft))	10/3,592	9/5,517
Floodplain (acres)	1.6	3.6

5.5 Coordination

The following coordination relevant to Section 106 of the NHPA and Section 4(f) of the DOT Act of 1966 has been completed. See Appendix 1, Key Agency Correspondence and Forms for associated documentation.

- ITD consulted with the Nez Perce Tribe, the Nez Perce Tribal Historic Preservation Office (THPO), and the Idaho SHPO regarding the cultural resources APE for all of the proposed alternatives.
- Cultural resource prefield investigations, field surveys, subsequent reports and report addendums were completed between 2003 and 2015. See Section 3.4. Cultural Resources.
- Tribal consultation letters and meetings were held annually between 2003 and 2015. See Chapter 7, Public Involvement and Agency Coordination.
- The report titled *Cultural Resources Surveys of Idaho Transportation Department Proposed US-95, Thorn Creek Road to Moscow, Phase 1; Project Latah County Idaho* (AHS 2006) was submitted to the Idaho SHPO. SHPO concurred with the finding of NRHP eligibility and determination of effects for the alternatives on January 2, 2007.
- The report titled *Historic Resources Survey update to An Historic Buildings/Structures Survey for the Idaho Transportation Department's Proposed US 95, Thorn Creek Road to Moscow, Stage 1 Project, Latah County, Idaho* (November 2011) was submitted to SHPO. SHPO determined that one additional resource; the Mountain Mart or Goodman Oil building is eligible for listing on the NRHP.
- During the 30-day public review period for this FEIS, the Department of Interior (DOI) and SHPO will have an opportunity to review the FEIS and Section 4(f) Evaluation.

- ITD consulted on the Modified W-4 Alternative with both the Nez Perce THPO and Idaho SHPO during the spring of 2015. After consultation with both parties, FHWA and ITD prepared a memo report describing the Modified W-4 Alternative on April 20, 2015, which was submitted to the Idaho SHPO. On June 16, 2015, the Idaho SHPO concurred with the finding that the Modified W-4 Alternative will result in No Effect to historic properties.

6 INDIRECT AND CUMULATIVE EFFECTS

6.1 Indirect Effects

This section evaluates the potential indirect effects of the alternatives.

6.1.1 Regulatory Framework and Policies

Relevant laws, regulations and guidance that pertain to indirect effects include:

- 40 CFR 1500-1508-CEQ Regulations
- 40 CFR 1508.8- Effects
- 23 CFR 771-FHWA Environmental Impact and Related Procedures
- FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents
- FHWA Interim Guidance: Indirect and Cumulative Impacts in NEPA
- FHWA Position Paper on Secondary and Cumulative Impact Assessment

6.1.2 Methodology

This chapter evaluates the indirect (secondary) effects of the alternatives, which might occur in the reasonably foreseeable future. Indirect effects may include highway-related growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems [40 USC 1508.8].

In this analysis, indirect effects are primarily resulting from land development, which could occur due to improved accessibility and mobility in the area as a result of the project. Indirect effects can have either beneficial or adverse effects on communities and natural resources.

The Delphi process was used to evaluate the project's indirect effects resulting from induced development. The process relies on the opinions of a panel of experts to provide their assessment of likely future outcomes by responding to several rounds of questions. This process included:

1. Collecting information about factors that are the most likely to influence future land development patterns
2. Making an estimate of the probable magnitude and direction of change in development patterns (i.e., indirect land use effects)

Several types of data were used to identify factors that would affect development patterns:

- Socio-economic conditions (population, employment by sub-area, and household characteristics)
- Land use patterns (location, type and extent of land development in the study area vacant land, building permits by type and location, development capacity)
- Transportation system characteristics
- Public services (primarily the availability of water and sewer connections) and
- Public policy (land use plan designation and zoning, economic development)

The induced growth analyses and findings are presented in the Community Profile and Induced Development Technical Report (December 2005). Additional interviews were conducted in November 2011 and the findings were summarized in a supplemental report (HDR 2011a). After the DEIS comment period, Latah County and the City of Moscow were contacted regarding new permits and growth in the project area.

6.1.3 Existing Conditions

Growth Trends and Land Use

The majority of the study area is agricultural with accompanying farmhouses and accessory buildings. There are clusters of residential development along portions of the corridor (Zeitler Road, Cameron Road, Eid Road, and Clyde Road) and two areas that have a concentration of residences (Woodland Heights Mobile Home Court and Hidden Village/ Benson Mobile Home parks). The northern portion of the corridor is more highly developed with a mix of uses emphasized on auto-oriented businesses.

Paradise Ridge consists of privately owned parcels with a mix of residential and commercial developments. Paradise Ridge Road provides the primary access to Paradise Ridge. There are approximately 55 existing residential and commercial developments on and around the ridge based on aerial photography and county parcel data. The developments have associated disturbances such as roads, driveways, soil disturbance, fences, pets and human disturbance. These developments as well as other developments in the project corridor would be regulated under the city and county land use regulations. The Latah County portion of the Thorncreek corridor is primarily zoned AF –Agriculture/Forest with some RR-Rural Residential along US-95 by Clyde Road. Paradise Ridge is zoned AF. The purpose of AF is to continue agriculture and forestry use in the county.

Low-density residential development is the only type of residential development allowed in unincorporated Latah County. Until 1997, the maximum density was one dwelling unit per acre. That requirement has been changed to one single-family residence per eligible parcel and the

minimum size for eligible parcels is one acre. The Latah County Ordinance details permitted uses, conditional use permits and other regulatory requirements. With a conditional use permits existing single-family dwellings may have additional dwellings at a density of one per 40 acres.

The northern project limit extends into the City of Moscow Area Of Impact, which is zoned commercial and industrial. South of Moscow, the area was recently rezoned for auto-related commercial. The rural, southern portion of the project area is zoned to support continued agricultural and forestry use in the county. Development along existing US-95 is concentrated at the main county and private roads.

Indirect Effects

South of Moscow all the Action Alternatives would have a moderate to low potential to induce development in the corridor. Land use in the study area is expected to remain very similar to current conditions. Eighty-three percent of the Delphi panelists acknowledged that development is already occurring at a slow rate in the project area. They acknowledge that once the final alternative is selected, pace and intensity would increase due to the alleviation of uncertainty as to the location of the alignment.

The Delphi panelists felt that the growth would occur in the area approximately one mile south of the Moscow city limits, regardless of the alternative selected. Due to the proximity to Moscow this growth would be consistent with planning documents and existing land uses. Panelists also felt that additional development is likely to occur along the US-95 alignments that are transferred to the NLHD.

The No Action Alternative would only include safety improvements on the existing alignment and would not induce development or result in substantial indirect effects.

Any of the Action Alternatives would benefit regional trade and could facilitate new commercial and industrial uses locating to the south of Moscow in areas which are already zoned for these purposes. They would all have increased development along their alignments, however, they would be limited by the City and County land use and zoning designations. All alternatives would tie into existing county and private roads and therefore, the trend of development at these intersections and roadways would continue.

A majority of the Delphi panelists felt that the type and pace of development along the county roads of Eid, Zeitler, Snow, and Sand roads would remain constant due to the lack of direct access to the proposed alignments. Property values in the general corridor area for all of the Action Alternatives would be expected to increase immediately south of Moscow and would remain unchanged in the rest of the corridor.

To promote an efficient and safe transportation system and to maintain the agricultural and rural character of the area, the Latah County Comprehensive Plan requires that limits be placed on the number of access points to state and federal highways; and encourages bike and pedestrian routes and mass-transit as transportation options. See Chapter 9, Environmental Commitments.

Highway-induced development and other indirect effects are expected to be moderate due to the following:

- The Action Alternatives would have Expressway Access Control that would limit the number and spacing of approaches and access points.
- Latah County would continue to enforce the zoning regulations, which only allow low-density residential development.
- The agricultural and rural character of the corridor will be maintained and will ensure consistency with the existing land use plans.

Indirect Effects by Resource

Social. The indirect effects of development may include increased noise, light and visual effects on surrounding areas; however, visual effects are very subjective and may be perceived differently by different individuals. Visual quality could be degraded due to exposed soils, erosion, unnatural slopes, the addition of new roadways and structures, and changes in vegetation. There could be increased use of recreational facilities, public resources, schools, and emergency services, utility distribution, buildings and traffic along the highway and south of Moscow.

Areas south of Moscow and adjacent to the existing highway that are currently identified for development may experience higher noise levels over time. ADT volumes on this section of US 95 are expected to increase and noise levels would increase proportionately. However, they would not result in noise levels that would approach or exceed FHWA noise impact levels.

Modified W-4 would have increased noise and visual effects to the University of Idaho Arboretum, located on a hill approximately three-quarters of a mile north of Modified W-4. Modified W-4 could have potential noise and visual effects to a master-planned community approximately one-quarter mile north of Modified W-4. A new development planned near the C-3 Alignment could potentially increase traffic and traffic related conflicts and access issues in the area. In early 2015, these planned developments had not yet been constructed. C-3 would be closer to more businesses and affect more approaches along the existing US-95 alignment compared to the other alternatives.

The C-3 alternative is already close to many residences and businesses compared to other alternatives, except on the area of new alignment,. This could have increased visual, noise and access effects to the greatest numbers of businesses; however, as described in the Economic section that follows, maintaining businesses with similar access and visibility along existing US-95 is preferred by many business owners (HDR 2006).

The primary indirect social effect of E-2 would be a visual effect to residents on Paradise Ridge due to the roadway alignment and acceleration of development south of Moscow and at intersections. See Community Impact Technical Reports for more details.

Economic. Indirect effects to economic conditions could involve changes to visibility and access or result from declining sales or client bases that may cause existing businesses to move to new locations or cause new businesses to locate in other areas. Vehicular access is important for customers to access the business establishments and for suppliers and shipment ingress and egress. Temporary disruptions to access could adversely affect businesses. Visibility could affect retail businesses requiring drive-by traffic but could also affect non-retail businesses.

C-3 is believed by business owners to have the least indirect effects because the access would be similar, although it would be changed to a limited access facility. Traffic would continue to pass by the existing businesses, which would encourage businesses to stay or locate in the area. The Modified W-4 and E-2 would have greater effects to visibility and access to existing businesses. These new alignments could potentially encourage new growth in the area. This new growth would be limited because direct access would be limited by the enforcement of Expressway Access Control. While safety and direct routes to and from Moscow and Lewiston are also believed to be important considerations for area businesses and goods movement, the travel times and safety between Action Alternatives do not differ substantially for goods movement. Road user costs, which estimate the cost of the delays to travelers, were calculated after the DEIS was published to determine economic effects of the alternatives. See the US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward (ITD 2014a).

Farmland. There could be more conversion of farmland up to one mile south of Moscow where growth is predicted with any of the alternatives. The Modified W-4 could result in greater indirect effects compared to the other alternatives because there are larger tracts of farmed land and the highest yielding fields on the western corridor compared to the farmland near the E-2 corridor. The rate of farmland conversion for the Modified W-4 could also be expected to be higher because it would be closer to the universities, more accessible to the cities and closer to planned developments.

Increased development could result in farmland fragmentation for any of the alternatives. Farming smaller fields and having to transport equipment across roadways or between separated fields could decrease efficiency and affect the viability of farming. Additional expenses to the producer caused by smaller operational units and the increased demand for development property could result in the land being used for purposes other than agricultural production. The loss of agricultural land would also be felt by farm services within the area. The effects to farmland would be minimized through the implementation of Expressway Access Control. For additional information regarding indirect effects to farmlands see the Farmland Technical Report.

Wetlands and Tributaries. Wetlands and tributaries are present throughout the corridor including at the north end of the project within the City of Moscow area of impact. Development is already expected to occur within the City of Moscow area of impact regardless of the project. Sections 401, 402 and 404 and of the Clean Water Act regulate activities in waters of the US and would require the replacement of lost functions and values of waters of the US including wetlands.

Development could increase the amount of impervious surfaces, thus increasing the potential for high peak flows, increased sediment, incised banks, pollutants, and increased water temperatures. Since development is likely to be concentrated south of Moscow, developers would also be required to comply with City stormwater ordinances, TMDLs and other stormwater requirements to minimize those effects. See the Wetland Technical Report for more detail.

Floodplains. Indirect effects to floodplains may result from induced residential and commercial growth. These may involve placing fill in the floodplains/floodway, vegetation removal, soil tilling, grading, and channel modification. These actions would degrade floodplain function including flood storage.

The floodplains (and a regulatory floodway) in the project area are concentrated at the north end of the project within the Moscow Area of Impact where growth is expected and along the W-4 alternative. There is no floodplain along the southern parts of the C-3 and E-2 alternatives. Development is required to comply with local floodplain regulations which would not allow a more than a one-foot rise in base flood elevations; therefore, none of the alternatives would likely result in indirect effects to floodplains.

Groundwater. The groundwater in the project area could be indirectly affected by the increase in impervious surface, increased development primarily south of Moscow where induced growth is anticipated. Development impacts to groundwater will be minimized through the compliance with the NPDES Construction General Permit and BMPs, which will require quantity and quality

treatment for most new developments. Limited access to US-95 would also minimize the potential induced growth and would minimize potential impacts to groundwater.

Vegetation. Vegetation may be affected indirectly through development, weed establishment, dispersal, and degradation of native habitats, rare plant populations and restoration areas. Thirty-two areas were identified as Palouse remnants during the 2005 inventory (Litchardt 2005). Many of these are known to support species of concern that could be affected by degradation of the remnants. The primary threat to the persistence of Palouse remnants in their present state is colonization by weeds; expansion of those present as well as invasion by new arrivals. Pesticide drift is also a threat. All remnants identified in the project area are bordered completely or partially by weedy vegetation; however, even with weed populations, many of the identified remnants are high-ranking. See the Vegetation Technical Reports and the Biological Assessment Technical Report.

New roadway alignments induced development and weed dispersal by vehicles can contribute to the establishment and spread of weeds and could contribute to the degradation of nearby Palouse remnants. Environmental effects of roads including the spread of weeds can extend more than 300 feet from the roadway (Forman 2000). However, other studies indicate that remnants within 0.6 miles of the highway are at greatest risk to weed invasion. (Lass and Prather 2007).

There are no known Palouse remnants within one mile south of Moscow; however, two remnants are within 1.25 miles south of Moscow and could potentially be affected by induced development.

Since the Modified W-4 alternative requires the greatest total right-of-way, it would have the greatest amount of soil disturbance and exposed soils; therefore, the greatest degree of weed establishment. The numbers of Palouse remnants near the alignments are presented in Table 68. Palouse Remnants Near Alternatives.

Table 68. Palouse Remnants Near Alternatives

Alternative	Palouse Remnants near Alignment
No Action	0
Modified W-4	12
C-3	14
E-2	24

C-3 would be within 1000 feet of the nearest remnant. The distances from the Modified W-4 Alternative to the nearest remnants was measured and the Modified W-4 Alternative would also be within approximately 1000 feet of the nearest remnant and would have similar findings as the W-4 Alternative. This could introduce new weeds contributing to the degradation of the remnant. Six Palouse remnants occur within 1000 feet of alternative E-2 and the closest is within 300 feet (Lass and Prather 2007). This includes the South End Paradise Ridge Conservation Site documented by the Idaho Conservation Data Center (CDC) in 1996 and a smaller remnant documented by CDC in 2005 as a conservation site. The Paradise Ridge area is already being affected by new residential development independent of the proposed project with approximately 55 homes and businesses on or around the ridge. The CRP land could be affected by weed invasion.

The E-2 Alternative would have the greatest indirect effects to Palouse remnants and rare plant restoration projects due to its proximity to more remnants and to the South Paradise Ridge Remnant, which is a high quality remnant but is not weed free. The E-2 Alternative is also closer than the other alternatives to ongoing rare plant and prairie restoration projects.

The E-2 Alternative would not go over the top of the ridge, but would parallel the grasslands on Paradise Ridge, about 0.7 mi from the summit and about 0.25 mi from the large Palouse remnant associated with the ridge summit. The E-2 Alternative would not directly impact any rare plants, threatened or endangered species or Palouse prairie remnants. Weed populations could affect potential habitat for rare and native plant species affecting their future success.

Noxious weeds that are known to occur in and around Moscow, which are known to be a threat to bunchgrass grasslands, but are not currently in the delineated remnants include yellow-star thistle (*Centaurea solstitialis*), spotted knapweed (*Centaurea maculosa*), teasel (*Dipsacus fullonum*), and Dalmatian toadflax (*Linaria dalmatica*).

There are many others that could prove to be threats (Tim Prather, pers. comm. 2005). Spalding's catchfly is the only federally listed plant known to occur in the project area. The USFWS determined that all of the alternatives may affect, but are not likely to adversely affect Spalding's catchfly based on potential indirect effects including degradation of habitat by weeds, as stated in the DEIS and FEIS Section 4.9. An additional survey for Spalding's catchfly in the project area was conducted in the summer of 2013 and no new populations were identified (Lichthardt 2014). The project area is within a key conservation area for Spalding's catchfly recovery with planned and existing restoration projects that could be indirectly affected by weeds. Indirect effects from the alternatives will be mitigated as described in Chapter 9, Environmental Commitments.

There are sites in the project vicinity for which restoration activities (ecological weed control, native plant establishment and establishment of Spalding's catchfly) are occurring or planned. The E-2 Alternative would not directly affect these areas but it would bring the roadway closer compared to the other alternatives. While invasive weeds are already present to differing extents on the sites, the closer alignment could contribute to weed establishment in sites near the road. The number of road cuts and fills and the amount of soil moved to construct the road will directly affect introduction of weeds. Planning and implementing successful revegetation may minimize weed establishment and spread. Measures that will minimize impacts due to potential weed infestations include, limiting access through the corridor which will limit future development, constructing farmable slopes, implementation of the SWPPP, and development of a weed control plan and seed mixes that will minimize weed establishment during and after construction. BMPs will be used to stabilize and vegetate bare soils. Grass cover will be patchy initially, allowing weed seeds to germinate. Intensively managed cropland is believed to provide a more efficient buffer to new weed invasion compared to native vegetation or CRP plantings. ITD will implement their Vegetation Management Plan, which includes ensuring successful establishment of roadside vegetation, pesticide and fertilizer application, erosion control and maintenance of native vegetation. ITD will consult with USFWS, IDFG, NRCS and Conservation District staff during the project design to develop measures to further minimize weed establishment and spread, particularly to Palouse remnants and restoration sites within 0.6 miles of the selected alternative that could be degraded by weeds. ITD will also monitor the effectiveness of the weed control measures and make corrective actions as needed. See Chapter 9, Environmental Commitments.

While none of the alternatives would directly affect federally listed threatened or endangered plants, they would bring the road closer to the Spalding's catchfly population and Palouse remnants. This could introduce weeds or have other indirect effects that could affect Spalding's catchfly plants found near the project area. The distance of each alternative from the Spalding's catchfly plants is shown in Table 69. Alternative Distances to Spalding's Catchfly. The Modified W-4 Alternatives' distance to Spalding's catchfly populations and Palouse remnants would be similar to the W-4 Alternative. The project May Affect but is Not Likely to Adversely Affect (NLAA) Spalding's catchfly due to these potential indirect effects. See Biological Assessment Technical Report. There could also be effects to the Spalding's catchfly Key Conservation Area and associated restoration efforts.

Table 69. Alternative Distances to Spalding's Catchfly

Alignment	Approximate Distance to Spalding's Catchfly Population (ft)
No Action	1,640
Modified W-4	1,573
C-3	2,102
E-2	4,757

ITD will implement its Vegetation Management Plan in conjunction with USFWS, IDFG and landowners within the project area, this may include providing funds to landowners for weed control in prairie restoration sites, constructing farmable slopes to minimize weed establishment and spread, and revegetating slopes and fills with native grasses and forbs to minimize weed establishment and spread along the roadway. Species will be determined in consultation with USFWS and NRCS to help ensure compatibility and successful establishment. The Action Alternatives will have Expressway Access Control, which would help minimize future development along the roadway and associated indirect effects. Additional information regarding indirect and cumulative effects to Palouse remnants and Paradise Ridge has been added to FEIS Chapter 6, Indirect and Cumulative Effects. The full list of mitigation measures as well as applicable standard specifications and BMPs for weed control are provided in the FEIS Chapter 9, Environmental Commitments.

Fish and Wildlife. Growth would occur with or without the project. There would likely be more dense development at the north end of the project, which is already more developed and has little suitable wildlife habitat.

Development in suitable wildlife habitat and movement corridors or increased development density could further restrict migration across the US-95 corridor. The types of developments that could have the greatest effect to wildlife movements are commercial, industrial, and higher density residential (i.e. subdivisions or apartment complexes) that would occur in or near Palouse remnants, pine stands, ungulate habitat, wetlands or water resources. Any residential development however, would have an effect. This development could reduce habitat connectivity, increase habitat fragmentation, and create isolated blocks of habitat. It could also displace wildlife causing them to move to other available habitats. For elk, which are a species that appear to be severely disrupted by roads and highways, Ruediger estimated the reduced use to be equivalent to the loss of approximately 732 acres of habitat. The effects of displacement are complex and likely influenced by the species of animal, terrain, vegetation, harassment factors (like hunting), traffic volume and how the highway is designed. In the long-term, displacement

and the minimal landscape fragmentation could result in more isolated subpopulations and reduction in genetic diversity (Ruediger 2007). See the Wildlife Technical Reports for more information.

Roads constructed due to indirect development can introduce weeds and transportation related pollutants like salt and automobile emissions. Historically, concentrations of lead in vegetation tended to be higher near roadways and could be ingested by deer. Today, lead is no longer an issue due to use of unleaded gasoline.

Fragmentation

While it is known that highways fragment landscapes, most of the native landscapes in the project area are already fragmented with the exception of the Paradise Ridge remnant (Lichthardt 2005). The E-2 Alternative would come closer to Paradise Ridge and could affect some local deer and elk winter range and other seasonal or year-round habitat. The Bald Butte area, a few miles west of existing US-95, has limited amounts of coniferous habitat and remnant Palouse Prairie, and it is already separated from Paradise Ridge and other similar habitat.

The alternatives would increase fragmentation for ungulates as well as other smaller wildlife, in an already fragmented environment. However, there is little evidence that significant habitat fragmentation will occur with any of the three action alternatives, even the E-2 Alternative (Ruediger 2007). Elk and moose habitat is limited in quantity and quality and confined to the Paradise Ridge vicinity. Since nearly all the elk and moose habitat is on Paradise Ridge and eastward, habitat fragmentation for these species is minimal. There will be some fragmentation of habitat, mostly along drainages and draws for small terrestrial species such as raccoon, skunks, coyotes, amphibians and reptiles (Ruediger 2007).

Deer move throughout the entire project area and are not confined to the timbered areas of Paradise Ridge. While development and associated road improvements may fragment the properties and temporarily displace deer, they are highly adaptable to human activities (Melquist 2005a). The development in areas that might serve as suitable habitat would have minimal effects and no measurable indirect effects are anticipated.

Elk tend to stay closer to security and seek cover more than deer. Therefore, induced growth along the E-2 corridor would have the greatest effect on elk because the route passes through existing cover and foraging areas in agricultural fields or CRP land adjacent to cover. Modified W-4 passes to the east of an area of suitable habitat near the Idaho-Washington border; therefore, any development in that area could also result in indirect effects to elk. However, no long-term indirect effects on elk populations are expected to occur as a result of corridor construction within the project area (Melquist 2005a). While elk are not nearly as tolerant of humans as

whitetail deer, elk have become more plentiful and expanded their range into more populated areas in recent years, and in doing so, they have become more tolerant of humans and human activity (Melquist 2005a). Elk will continue to move between Paradise Ridge and the patches of habitat along the Washington border (Rand per. com. 2005).

Elk have been shown to use habitat adjacent to roads less than similar habitat that is not affected by roads (Rowland et al. 2005, Wisdom 1998, Johnson et al. 2000, Ager et al. 2003, Perry and Overly 1977, Lyon 1979). Elk responses to highways and roads vary by topography, vegetation, traffic volumes, how the highway is designed and whether or not elk are hunted. Generally, elk use decreases as the proximity to roads and highways increases. (Rowland et al. 2000) found that there was a measurable decline in elk use up to 5,500 feet from roads. (Roloff 1998) and (Rowland et al. 2000) suggest assessing elk habitat using distance band approaches (Ruediger 2007).

There are likely other species also impacted, such as deer, moose and birds that would be included within the elk displacement impact described by Ruediger, however, the deer, moose, and birds are more widespread and less sensitive to human development; therefore, displacement and loss of habitat is expected to be low for either the species involved (at a population level) or on the total amount of habitat available in Latah County, the region or state (Ruediger 2007).

Movements of moose west of US-95 are less common, as habitat is limited and separated by three to four miles of agricultural fields. Nonetheless, exploratory movements by moose are likely to occur throughout the project area. The greatest indirect effect of development in this corridor might be the restriction of western movement by moose. However, their movement is random and occasional and there is ample suitable habitat outside of the area. See the Wildlife Technical Reports for more detail.

Approximately 3.9 acres of a pine stand will be affected by the E-2 Alternative leaving approximately six-acres on the west side of the highway and approximately 20 acres on the east side of the highway. The roadway would increase fragmentation of this forest habitat due to tree removal, and having a roadway located between remaining pine stands. This could affect wildlife including pygmy nuthatch.

Pygmy nuthatches are known to be sedentary and young birds may move an average of 286 meters (m) or 938 ft from their natal area, but have been observed to move up to 533 m or 1,749 ft (Ghalambor 2006). Tree removal for road construction or other development may increase the distance between habitats (Ghalambor 2006) and could affect access to patches of pine stands. Research in Europe shows that habitat fragmentation affects the dispersal process in the closely related European nuthatch (*Sitta europea*) (Matthysen and Currie 1996). The rate of territory

settlement was rapid and associated with rapid pair formation in a large forest tract, nuthatches fill vacant territories at a slower rate and experienced lower pairing success in the small forest fragments (Matthysen and Currie 1996). The expected use of the remainder of the segmented pine stand is described in Section 4.8 under Pine Stand Effects.

Melquist in his report states that pygmy nuthatch suitable habitat, mature ponderosa pine stands, are located nearby near the Dumroese property, near the Robinson Lake Park in Moscow, Idler's Rest and most of the areas of the Palouse that still have ponderosa pine (Melquist 2005b; figure 3). The remaining fragments of the pine stand along the E-2 Alternative may still offer pygmy nuthatch habitat. See Section 4.8 under Pine Stand Effects. The remaining pine stands locally, regionally and statewide are expected to be sufficient to continue to support pygmy nuthatch populations.

The alternatives could also have effects to birds due to traffic noise. A study of the effects of busy roads on wildlife indicated that traffic noise from busy roadways could affect communication for grassland birds (Foreman, 2000); however, the effects of noise on birds vary with traffic volume, speed, wildlife species and habitats. The study was based on a road with traffic counts measured between 45,000 to 150,000 vehicles per day, which is between five and 18 times greater than the Thorncreek Road to Moscow project. The study also did not measure the noise levels. The predicted traffic volumes and predicted noise levels for the roadway in the study are much higher than the predicted levels for this section of US-95.

In a Massachusetts study highways with moderate traffic volume (8,000-15,000 ADT) showed no effect on bird presence, although breeding was affected for 400 m (Foreman et. al 2003). For relatively light traffic volumes (3,000-8,000 ADT) there was no significant effect on grassland bird distribution (Foreman et. al., 2003). The volumes of the action alternatives are predicted to have 8524 ADT in 2037.

6.2 Cumulative Effects

This section evaluates the potential cumulative effects of the Action Alternatives.

6.2.1 Regulatory Framework and Policies

Relevant laws, regulations and guidance that pertain to indirect effects include:

- 40 CFR 1508.7 Cumulative Effects
- FHWA Interim Guidance: Indirect and Cumulative Impacts in NEPA
- FHWA Position Paper on Secondary and Cumulative Impact Assessment

- FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents
- CEQ Guidance on the Consideration of Past Actions in Cumulative Effects Analysis
- CEQ Considering Cumulative Effects under the National Environmental Policy Act

6.2.2 Methodology

The methodology for determining the cumulative effects of the proposed project is based on Considering Cumulative Effects under the National Environmental Policy Act (CEQ 1997).

Cumulative effects (impacts) are defined by the CEQ regulations as "the impact on the environment which results from the incremental impact of the [proposed] action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time" [40 CFR 1508.7]. Cumulative impacts include the direct and indirect impacts of a project together with the reasonably foreseeable future actions of other projects. According to CEQ's cumulative impacts guidance, the cumulative impact analysis should be narrowed to focus on important issues at a national, regional, or local level. The analysis should look at other actions that could have similar effects and whether a particular resource has historically been affected by cumulative actions.

During the scoping period, letters were sent to the resource agencies asking them to identify issues to be studied in the EIS. Ongoing coordination with the resource agencies has continued to evaluate the potential resource effects and to address agency concerns. Based on the concerns identified during the scoping process and the potential for direct and indirect effects from the project, the cumulative effect analysis focuses on four key resources.

- Farmland - This includes conversion of farmland to other uses.
- Wildlife and Vegetation – This includes barriers to wildlife movement, fragmentation of habitat and loss of habitat for wildlife, fish and vegetation.
- Wetlands and Tributaries - This includes degradation of water quality, loss of wetlands, effects to tributaries and effects to floodplains.
- Visual effects - This includes effects to the aesthetics of the area.

6.2.3 Cumulative Effects to Resources

Development

All of the Action Alternatives would have a moderate to low potential to induce development. Land use is likely to remain very similar to current conditions in the project area. The area immediately south of Moscow within the area of impact is zoned for more dense land uses and is being developed accordingly. The southern part of the project is designated for agricultural and rural residential land uses; therefore, the existing farmland is expected to be retained. US-95 is currently designated as a Statewide Access Control highway and the Action Alternatives were desigated as Expressway Access Control, which restricts future access to US-95 and limits induced development along the highway corridor.

The key past, present and reasonably foreseeable future development projects that were considered are discussed in the Community Impact Technical Reports. Potential developments that are considered in the City of Moscow Comprehensive Plan and considered in the evaluation of cumulative effects include: the Ring Road concept, a proposed rezoning and annex for a ball park, auto-urban commercial land use along US-95 south of Moscow, auto-urban residential growth south of Moscow and an industrial park north of the South Fork of the Palouse River. See Section 3.2.3 for additional information.

Wildlife and Vegetation

Past Effects. The project is within the Palouse Bioregion. Historically, the area had scattered Ponderosa pine stands with shrubs and native bunchgrasses. Beginning in the early 1800s, with the settling of the area, the native vegetation was cleared and converted to agricultural use, grazing, and urban development. Currently up to 99 percent of the Palouse have been converted and only remnants of the Palouse Prairie vegetation remain. The remaining Palouse remnants continue to be eliminated through weed invasion and residential development. The remnants are primarily located in isolated, rocky, unproductive farmland soils and have been degraded to varying extent by weeds. Degradation of Palouse remnants through weed infestation is the greatest threat to the remnants. Rare plants including Spalding's catchfly also historically occurred in this area and have suffered from decline.

Ongoing human impacts to Palouse remnants in the study area include 1) herbicide drift from adjoining cropland, 2) tracking by farm and recreational vehicles, 3) invasion by perennial pasture grasses from adjoining retired fields, and 4) invasion of exotic species in general. Effects of pesticide use on pollinators could be added to this list, assuming pollinators are limiting to reproductive success. (Lichardt 2008).

Big game was relatively scarce in the early 1900s, but agricultural crops and construction of stock ponds created desirable browsing areas, which attracted elk and deer. This newly created habitat, in combination with a reduction in predators allowed continued growth of deer and elk populations through the mid-1950s, when populations peaked. The number of homes in the wooded areas and areas on and near Paradise Ridge continues to increase. The continual elimination of trees and shrubs that provide suitable cover for browsing ungulates and other wildlife has degraded the availability of quality habitat in the project area.

Project Effects.

Palouse remnants and rare plants. There would be no direct effects to Palouse remnants or rare plants from the project. There could be indirect effects to Palouse remnants, rare plants where project-induced development such as roads are constructed near (approximately 300 feet) from remnants, which could spread weeds. The potential for those weeds to move from the roadside into a remnant will depend upon dispersal methods, distance to the remnant and the intervening land uses. Intensively managed land such as cropland might provide a more efficient buffer for new weed invation than native vegetation or Conservation Reserve Plantings. New highway construction could accelerate weed introduction due to bare soils, although revegetation will be implemented. However, planting perennial pasture grasses or species and invasive species in the right-of-way could accelerate weed infestation. The chance of weed invasion decreases with increasing distance from the development or roadway. (Lichthardt 2005).

Pine stands. There would be direct effects to 3.9 acres of pine stands as described in Section 4.8 under Pine Stand Effects. This habitat provides habitat for many wildlife species including pygmy nuthatch, long-eared myotis and northern alligator lizard. The construction of the E-2 Alternative may have indirect effects to species using the pine habitat through habitat fragmentation, noise and closer human activity. See Section 6.1 Indirect Effects. Remaining pine stands could be indirectly affected due to induced development on the north end of the project and near county road intersections where pine stands occur.

Ungulates. The southern section of the project is considered to have the highest occurrences of ungulates in the project area. It is within the Thorncreek (ID2-04) linkage area, an area identified in an IDFG and ITD wildlife corridor study as a highway segment that intersects a movement corridor for deer, elk, moose and small mammals. However, the linkage area is determined to be low priority compared to other linkage areas in the IDFG Linkage Database (ITD 2013).

Impacts to moose and elk would include direct loss of poor to marginal habitat, increased risk of collisions, possible loss of connectivity to habitats, and displacement (Melquist 2005a). Impacts to white-tailed deer would include direct loss of habitat, increased risk of vehicle collisions, and

possible loss of connectivity to marginal habitats between E-2 and the existing alignment (Sawyer 2010).

The increased projected traffic volumes through the area could deter wildlife movement and increase wild animal crashes in the area; however, the effects would be mitigated by the wider typical section that would allow for improved sight distance and recovery. . See Section 4.8 Vegetation, Fish and Wildlife Effects and Wildlife Technical Reports for more detail.

Future Effects.
Delphi panelists predicted growth would primarily occur just south of Moscow, west of existing US-95 and along the highway alignments near county road intersections. Habitat loss and fragmentation resulting from the increased development on Paradise Ridge will continue, irrespective of the construction of the highway.

Palouse remnants and rare plants. Foreseeable future human impacts to Palouse remnants and rare plants include land development and invasion by weed species –those that have been introduced to the area, but have not yet spread. Land development is expected to spread outward from Moscow, into the north end of the study area, affecting Palouse remnants, grassland communities and pine stands where present.

Current agricultural practices are expected to continue through the study area. Cumulative effects may include pesticide drift from adjoining cropland, tracking by farm equipment and RVs, which can lead to sedimentation and weed dispersal. Harvesting and plowing may also affect grassland nesting bird species and functions of matrix habitat. However, agricultural operations are not expected to significantly affect bumble bee populations or giant Palouse earthworms due to the types of crops being planting and the fact that past earthworm occurrences were not in active agricultural lands.

A private loop road for development was constructed near Clyde Hill. Increased development on or near Spalding's catchfly plants in this area may adversely affect this federally protected plant as well as the private lands that are identified for restoration efforts within the key conservation area. Weed dispersal and infestation may also adversely affect the populations of Spalding's catchfly.

Numerous weed species that currently exist in the Moscow area were not found in any of the remnants (Lass and Prather 2007) and represent a future threat to remnants in the study area. Some are known to be a threat to bunchgrass grasslands and others are too recently introduced to predict their impacts. Based on the number of weed introductions and rapidity of their expansion

in recent years, it is easy to foresee new species entering and degrading remaining remnants (Lichthardt 2008)

Ungulates. Because deer commonly feed on lawns, ornamental plants, and fruit trees, the effects on deer would be minimal as deer thrive near humans. However, moose would likely be negatively affected as complaints by homeowners that moose are eating ornamental shrubs in their yards or tearing down fences often lead to the removal of animals. In the Paradise Ridge area, if removal exceeds replenishment from immigration, moose would become temporary and intermittent residents.

Habitat fragmentation and habitat loss as a result of continued rural residential development on Paradise Ridge would have the greatest effect to elk. (Melquist 2005a). There are approximately 55 residences and commercial operations on and around Paradise Ridge; however, there are were no new permits for developments recorded with Latah County when researched in 2014 year (ITD 2014b).

The cumulative effects of primarily current and future residential development and fragmentation and loss of habitat could be sufficient to eventually discourage elk use of the Paradise Ridge area. However, more important to the presence of elk in the Paradise Ridge area is maintaining connectivity to larger tracts of suitable habitat to the north and east, and ensuring the suitability of eastern corridor habitat patches. Unlike deer, elk are more sensitive to both temporary and permanent human intrusion into their habitats (Melquist 2005a).

Cumulative Effects. Changes in land use as a result of the project would largely determine cumulative effects to wildlife. Potential increases in the rate of development due to the project and development unrelated to the project, added to the past effects of development and farming, which initially eliminated most of the native plant communities, could result in cumulative effects to native plant cummunities including Palouse prairie, rare plants and pine stands. There is a high probability of cumulative effects of future weed movements. Minimizing the proximity of the disturbance to remnants, especially high quality remnants, will minimize the degree to which species and communities of conservation concern are affected. (Lichardt 2008).

Further loss of Palouse remnants, rare plants and pine stands can be prevented by encouraging landowners, government entities, or conservation groups who value the habitats to purchase the parcels and preserve them or place land use restrictions on developing such sites. (Lichardt 2008).

Many of the wildlife species that would occur in the project area are non-native species and habitat generalist species like raccoon, white-tail deer and a variety of other common species.

These species, while important locally, are mainly species already adaptable to habitat modifications and high levels of human use (Ruediger 2007).

Elk and moose are more sensitive to human use patterns such as development compared to deer. Regardless, the suitable habitat for elk and moose is limited in quantity and quality and confined to the Paradise Ridge vicinity. While they may forage in the agricultural fields, they typically stay close to cover (Melquist 2005a). Since nearly all of the suitable elk and moose habitat is on Paradise Ridge and eastward, the cumulative effects to their habitat and to their movement is expected to be minimal.

The effects of this project when combined with effects of past, present and future private and public developments in the area could result in cumulative adverse effects to wildlife habitat and movement. It could also result in cumulative effects to Spalding's catchfly. These cumulative effects would include habitat loss, increased mortality, increased habitat fragmentation, and decreased habitat connectivity. However, IDFG expects that overall healthy populations would continue (USFWS 2007). Finally, thousands of acres of public lands with more suitable wildlife habitat are available north and east of Paradise Ridge and just over the Washington State Line. Because of the availability of suitable habitat and species, there is not expected to be substantial cumulative effects to wildlife and the effects would not reduce population viability.

Farmland

Past Effects. The project is located in the rolling Palouse hills of southwestern Latah County. It lies on the eastern margin of the Columbia Plateau where lava flowed into low-lying areas leaving higher hills exposed. Over succeeding millennia, streams cut into the bedrock, wind-blown loess was thickly deposited over the surface, and seasonal flooding added alluvial sediments to valley floors (Bush, Provant, and Gill 1998; Othberg 1982). Highly fertile silt loam soils developed in the wind-deposited loess (Barker 1981). These geologic conditions created the basis for the highly productive Palouse soils, which are farmed today.

Prior to Euro-American agricultural encroachment, the area was native grasslands and ponderosa pine, Douglas fir, and other tree species occurring in riparian zones and on some north-facing slopes (Franklin and Dyrness 1988). Today most of the region is farmed, with wheat and legumes being the primary crops. There are also agricultural lands, typically low yielding areas that are voluntarily enrolled in CRP and removed from farming. These lands are planted with native grasses and vegetation but landowners may withdraw from this program at any time. See Section 3.3 Farmlands for a characterization of the farmland in Latah County and the project area.

Project Effects. Direct and indirect effects of the alternatives to farmland are discussed in Section 4.3 Farmland Effects and 6.1 Indirect Effects. The effects include conversion of farmland to other uses, farm fragmentation and creation of smaller less efficiently farmed areas.

Future Effects. Future development south of Moscow and near planned developments in the western corridor could increase property values and encourage conversion of farmland to other uses. However, the Latah County Comprehensive Plan designates much of the area as agricultural. Those areas that are not zoned agricultural are closer to Moscow where growth has already been planned.

Cumulative Effects. The majority of the study area has already been converted to farmland with scattered urban and rural residential areas. Any effects from the project in combination with the projects in the foreseeable future are not expected to result in a cumulative effect to farmland and farming practices. There is abundant farmland available and the comprehensive plan is consistent with maintaining agricultural land uses.

Wetlands and Tributaries

Past Effects. Wetlands and tributaries in the South Fork Palouse River Subbasin have been extensively altered as a result of urban and agricultural development. Approximately 97 percent of the wetlands in the Palouse have been converted to crops, hay, or pasture since 1870 (Black et al. 2003). Less than one percent of the historic grassland wetlands exist today. Most of the remaining small patches of grassland and riparian vegetation disappeared between 1940 and 1989 due to the increase in agricultural activities in the Palouse.

Euro-American missionaries and settlers arrived in the Palouse region converting the land to a privately owned commodity. Faming removed much of the native vegetation, which led to increased soil erosion and down cutting of tributaries. As a result of the down cut channels, the water table receded, permitting bottom lands and small meadows formerly considered too wet to farm, to be farmed. The introduction of reed canarygrass, which was reportedly planted to reduce stream channel erosion, resulted in an aggressive colonization of reed canarygrass dominated lowlands. The grass invaded wet meadows and provided aggressive competition to native plants. Wetland drainage further reduced the extent of the native camas meadows; during the 1950s, many of the wet depressional areas of the Palouse were drained (Weddell 2001).

Agricultural and urban development resulted in the channelizing of streams, removal of riparian vegetation, increased erosion and sedimentation and other water quality impacts (including high nutrient loading and high water temperatures). This adversely affects fish and wildlife habitat.

Project Effects. The majority of the wetlands affected by the alternatives are rated as Category III, palustrine emergent wetlands. Most are small, disturbed and less diverse than the surrounding environment. The E-2 Alternative will also impact 0.92 acres of palustrine scrub-shrub wetlands that offer greater habitat function, are less common and are considered to be more difficult to replace compared to the PEM wetlands. Loss and degradation of additional wetlands and streams resulting from the alternatives would negatively affect the wetland system by further degrading water quality, vegetation removal and fill. However, temporary and permanent stormwater best management practices will also be implemented which will help mitigate for water quality effects. 23 CFR 777 and Section 404 of the Clean Water Act require mitigation for affected wetland functions and values which will compensate for wetland and surface water effects. See Chapter 9. Environmental Commitments for how effects to wetlands and tributaries will be mitigated.

Future Trends. Reasonably foreseeable urban and rural residential developments and farming activities could affect wetland and tributary functions and value through wetland fill, sediment deposit, pesticide use, vegetation removal and degradation of wildlife habitat.

Many of the wetlands and tributaries located in the sub basins are in floodplains and subject to strict development restrictions. Overall, there will continue to be conversion of wetlands to increasingly dense levels of urban development or farming in some areas. Wetland functions will be lost in some portions of the area since all mitigation will likely not be accomplished at the site of the impacts. Tributaries that are impacted will likely be relocated or replaced which could result in degradation. Wetlands and tributaries that are determined to be jurisdictional by the Corps of Engineers are subject to the requirements of the CWA, Section 404(b)(1) guidelines and mitigation outlined in the Compensatory Mitigation for Losses of Aquatic Resources; Final Rule, April 10, 2008, [33 CFR 325] and [33 CFR 332, 40 CFR 230].

Cumulative Effects. The loss of wetlands and effects to tributaries resulting from this project, along with the loss of wetlands and degradation of tributaries due to past and future urban and agricultural development, could contribute to cumulative effects. Ongoing agricultural activities and urban and rural residential growth, in addition to the project impacts, could result in cumulative impacts to wetlands, particularly to PSS wetlands. The successful implementation of wetland mitigation is expected to offset these potential cumulative effects.

Floodplains

Past Effects. Floodplains in Latah County have been degraded primarily as a result of past and ongoing farmland conversion. Road construction, scattered residential and industrial development has also contributed to the degradation. As a result, there has been vegetation

removal, sedimentation and erosion and to a lesser extent bank shaping, channeling and other historical riparian modifications.

Project Effects. The Modified W-4 and C-3 alternatives would encroach on the 100-year floodplain. Prior to construction, a detailed floodplain study, floodplain development permit and hydraulic analysis will be completed. The project will be designed to not result in a rise in base flood elevations and all structures in the floodplain will be designed to sufficiently pass hydraulic flow. Therefore the alternatives are not expected to result in a substantial effect. The E-2 Alternative would not encroach on the 100-year floodplain.

Future Effects. Predicted growth in the study area is concentrated south of Moscow and west of existing US-95 so the potential effects to floodplains are primarily associated with the South Fork Palouse River. However, that area has a designated floodway where no development is allowed. Any proposed development within the mapped 100-year floodplain is required to complete a hydraulic analysis and to apply for a floodplain development permit. Therefore it can be expected that any future developments would not substantially adversely affect the floodplains.

Cumulative Effects. Effects to floodplains in Latah County have occurred primarily as a result of past and current agricultural activities, urban and residential development. The proposed effects from the Modified W-4 and C-3 alternatives in combination with the past, present and reasonably foreseeable future effects could contribute to cumulative effects to floodplains. However with strict floodplain development regulations these are not expected to be significant. Since the E-2 Alternative would not encroach on floodplains, there would be no cumulative effects to floodplains as a result of the E-2 Alternative.

Visual Effects

Past Effects. The Palouse was dominated by native grasslands with scattered tree stands before euro American settlement. Beginning in the early 1800s the area has continuously been converted to agricultural land with scattered urban and rural residential development. Currently the agricultural views characterize the area. Palouse remnants, the largest being Paradise Ridge, are also visible. Most of the urban development is concentrated just south of Moscow and is continuing on Paradise Ridge. Existing roadways and the power lines are now the most visible linear features in the area.

Project Effects. The project would cause a high effect to residential viewpoints. The project would result in moderate to low visual effects where the alternatives approach the City of Moscow and the setting is more developed. Effects would be the result of grading, exposed

soils, erosion, and unnatural slopes. The addition of a new highway, structures, development and vegetation removal would also potentially affect the visual quality.

Future Effects. The projects in the reasonably foreseeable future would be primarily located south of Moscow and in the western corridor near the universities. The area south of Moscow is already developed and therefore there would not be a substantial effect to visual quality. Continued development on Paradise Ridge would result in changes to the viewshed. These changes could be perceived as better, worse, or mixed depending on the perceptions and feelings of those viewing the area.

Future transmission lines may potentially follow the alternatives' alignment to facilitate access and to consolidate impacts into a single corridor. This may further contribute to the additional contrast in the existing natural landscape. Direct effects to visual quality resulting from the alternatives are discussed in Section 4.11 Visual Quality Effects.

Cumulative Effects. The project would cause an overall high increase in cumulative impacts to sensitive viewers (residential viewpoints) due to the general lack of current viewshed impacts and the relatively natural setting for the majority of the alternatives, with a moderate to low increase in cumulative impacts where the alternatives approach the City of Moscow and the setting is more developed.

Potential Mitigation Measures for Cumulative Effects

While cumulative effects would result primarily from actions outside of the control of FHWA and ITD, CEQ regulations require that mitigation measures for cumulative effects be identified and discussed in this FEIS. Potential mitigation measures could include the following:

- Development projects will be required to implement mitigation for unavoidable adverse effects to wetlands and waters of the US according to the mitigation rule issued on March 31, 2008, by the EPA and the USACE under Section 404 of the CWA. These regulations are designed to improve the effectiveness of compensatory mitigation to replace lost aquatic resource functions and area, expand public participation in compensatory mitigation decision making, and increase the efficiency and predictability of the mitigation project review process [33 CFR 332] [40 CFR 230].
- Many of the wetlands and streams are within a regulatory floodplain. The implementation of the National Floodplain Insurance Program (NFIP), a program managed by FEMA, should reduce negative effects to floodplains in the future. Through the NFIP, FEMA has established minimum federal standards for floodplain regulation that are administered locally by cities and counties with state oversight by IDWR. Projects constructed within the floodplain must be in compliance with the NFIP.

- ITD will limit access on US-95.
- ITD will plant native species that would be unappealing to wildlife near the roadways to minimize wildlife collisions and encourage farming to the edge of the roadway to control weed establishment and dispersal. This will be based on adjacent property conditions and landowner preferences.
- Latah County and the City of Moscow could pass protective ordinances for development on Palouse remnants including Paradise Ridge. They could encourage planting of native plant species, such as Spalding's catchfly, throughout the county.
- Latah County and the City of Moscow could pass additional protective ordinances for development in wetlands, streams associated riparian areas, farmland and wildlife habitat areas.
- Latah County and the City of Moscow could encourage installation of watering areas further from the roadway and east of Paradise Ridge.
- Latah County, the City of Moscow or other agencies or conservation organizations could purchase properties, place development restrictions or implement other protective measures to protect Paradise Ridge and identified wildlife movement corridors from development. They could establish protective ordinances for viewsheds or noise, which would benefit residents, travelers and wildlife.

7 PUBLIC INVOLVEMENT AND AGENCY COORDINATION

A Public Involvement Plan has been developed to identify key goals, objectives and methods for this process. The public has had numerous opportunities to participate throughout the project including attending open houses, public workshops, breakfast meetings, and/or submitting written comments. A comprehensive list of the public involvement and meeting summaries and notes are available at www.itd.idaho.gov/Projects/D2/. Details of the stakeholder, agency meetings and public comments are on file at the Idaho Transportation Department District 2 office.

A multitude of public involvement activities and tools were employed as listed below:

- Press Releases-38 Press Releases were used to announce public meetings
- Breakfast Meetings-32 Breakfast Meetings were held between 2006 and 2009 to provide a forum for the public to get project updates, learn about the environmental analyses and to ask questions.
- Newsletters-32 Newsletters were distributed between 2004 and 2007. The newsletters included project updates, feature stories, technical information and next steps.
- Project Video-A video was shown during the public scoping meetings in 2005 to introduce the project purpose and need. It was made available on the website and continuously updated on the project website.
- Project Brochure-A project brochure was produced in 2006 and updated in 2010. It provided the public with an overview of the project, including its background, components and the opportunities for public participation.
- Public Meetings were held between 2004 and 2006
  - Public scoping meetings were held November 3 and 4, 2004 to obtain preliminary input from the public regarding problems, solutions and possible alternatives. There were approximately 500 attendees and 300 comments received.
  - Alternative Alignment Workshops were held on January 19 and 20, 2005. These workshops presented a range of possible alternatives and alignments to the public based on previous input and analysis. There were approximately 200 participants and 550 comments received.
  - Public Open House Meeting-An open house was held April 13, 2005. The meeting presented results from the Alternative Alignment Workshops and showed the next steps for the project. There were over 100 attendees and 27 comments received.
  - Public Open House-Additional open house meetings were held January 18 and 19, 2006. The 11 initial alternatives (No action and 10 Action Alternatives) were presented for public input. ITD's recommendations for alternatives and environmental studies were also presented. There were approximately 600 participants and 695 comments received.

- Community Presentation/workshops and Interviews were held throughout the project development.
- Information Kiosks-Mobile kiosks were placed at two public locations to provide project information and to collect public input between November 2004 and June 2005.
- Community Impact Assessment-This study included three days of completing community member interviews, questionnaires and all day drop-ins, which were compiled in 2006 and updated in 2011. See the Community Impact Technical Reports.
- Fact sheets and handouts were developed when detailed information about a particular issue was needed for distribution to a wide audience or for meetings.
- A Project Website was developed and is maintained for the project duration. It is available at www.itd.idaho.gov/Projects/D2/. The website provides the public with information including progress updates and public involvement activities and allows questions to be raised or comments to be made. The website is updated continuously with milestones, press releases, relevant project materials, reports, and comments collected.
- Property owner meetings and stakeholder interviews were conducted throughout the project development process

Stakeholder interviews were conducted at two stages in the environmental process: during initial scoping, and during the development and evaluation of potential alternatives. This enabled ITD and FHWA to gain an in-depth understanding of community issues, values, and constraints regarding the proposed action. During the initial scoping, interviews were conducted with local elected and appointed officials, community transportation and planning officials, and business owners in and near the study area. Stakeholder interviews were conducted during the development and evaluation of potential alternatives. These were documented in the scoping report on file at ITD District 2.

Federal, state, and local agencies and The Nez Perce Tribe representatives that would have an interest in the project participated in the scoping and development of alternatives.
The agencies reviewed and provided input on goals and the purpose and need statement, assessed the transportation needs for the corridor, evaluated and reviewed screening methodologies, and provided input on a range of alternatives. Coordination meetings were held with the agencies to explain the process, define the agencies' roles, and to solicit feedback at various stages in the development of the proposed action.

The Nez Perce Tribe reservation boundaries are located south of the project area and do not occur within the project study area. The Nez Perce Tribe was consulted with throughout the development of the project. They were provided copies of all the cultural resource documents prepared for the project. In addition, the ITD District Administrator has been meeting with the

Nez Perce Tribe quarterly since 2002 to discuss ITD District 2 projects, which included US-95 Thorncreek Road to Moscow. ITD has a Memorandum of Understanding with SHPO and the Nez Perce Tribe. See Appendix 1. Key Agency Correspondence and Forms. Tribal consultation meetings occurred on the dates listed below:

- December 9, 2004
- September 8, 2005
- December 8, 2005
- March 9, 2006
- November 27, 2006
- March 26, 2007
- February 27, 2008
- July 14, 2008
- November 13, 2008
- March 12, 2009
- June 11, 2009
- December 10, 2009
- February 11, 2010
- April 15, 2010
- October 14, 2010
- August 22, 2011
- March 1, 2012

Public and agency comments received during the public involvement process were used to identify the range of reasonable alternatives and to identify environmental issues to be evaluated. The summaries of the public involvement opportunities are posted on the project website and located at the ITD District 2 office. The major themes of the public concerns included:

- Opposition to western alternative due to noise and visual effects to University Arboretum and effects to historical and residential properties
- Opposition to the eastern alternative due to possible effects to Paradise Ridge.
- Support for the eastern alternative because it is an ecologically sound and cost-effective alternative and because it is the safest and shortest alternative.
- Support for the central alternative because it uses less undeveloped land and causes the least effect to the community and wildlife. It is also the closest to current route.
- Support to improve the existing highway because it is the least costly. Passing lanes could be added and Reisenauer Hill could be modified to reduce hazards.
- ITD has not been clear in showing how the eastern and western alternatives would be seen from the city of Moscow.
- Safety and efficiency should be the most important criteria used in selecting an alternative.
- The public needs to attend the upcoming public hearing to voice input and ask questions.

- ITD has not altered any of the three proposed alternatives after extensive public input.
- The Giant Palouse Earthworm was petitioned to the U.S. Department of Interior for listing on the Endangered Species Act; however, the earthworm was not listed. The Earthworm's habitat is within the scope of this project and should be included in ITD's environmental analysis.
- How did ITD draw their conclusions from the public meeting comments?
- Did ITD include all comments received from the public in their analysis?
- What is the time frame for a decision? How would the public be notified of the decision?
- How many miles would a five-lane with center turn lane alternative be?
- How many miles would be turned over to the Latah County Highway District?
- Has ITD conducted a storm water analysis?
- Bird watchers on the Palouse submitted a petition with 14 signatures that opposed moving US-95 near Paradise Ridge, specifically opposing the E2 alternative.
- A second petition was submitted by a separate group, with 361 signatures opposing the E-2 Alternative.

There was a 45-day public comment period during which oral and written testimonies regarding the DEIS and alternatives were collected. A public hearing was held during the public comment period.

7.1 Public Involvement Since DEIS Publication

7.1.1 Public Hearing

A public hearing was held to provide the public with information regarding the project, the alternatives and impacts in compliance with 23 CFR 771. The public hearing was held at the Best Western Plus University Inn in Moscow Idaho on January 23, 2013 from 2:30 pm to 8:30 pm.

The hearing included an open microphone session to allow the public to provide their comments to the attending public. The public was also able to provide comment through comment forms, and verbal testimony to a hearing officer. Staff and subject experts were available to provide information regarding the project, existing conditions, resources, and impacts. Public information materials included maps with the alignments overlain, informational displays on the resources, alignments and processes. The DEIS, Technical Reports, project brochure and video were also available.

The public hearing was advertised by sending press releases to the local newspaper, posting information on the project website, sending out letters to stakeholders and the general public and through other media such as radio.

7.1.2 Notification of DEIS Availability

Federal Register Notification

An official notification of the DEIS availability was placed in the Federal Register on Jan. 4, 2013. This notice marked the start of the comment period, which ended on February 25, 2013 and was extended to March 25, 2013.

Letter to Elected Officials

ITD sent a formal letter to 16 local, state and federal elected officials on December 21, 2012 announcing the DEIS comment period, the public hearing and a summary of the project and the Preferred Alternative.

Property Owner Letter

ITD sent letters to 104 property owners, utility companies, tribes and other local groups. The property owner letter invited the public to the hearing, provided a list of DEIS viewing locations and directions for giving comments.

Mailing to Stakeholder Database

ITD mailed a packet of information to 795 stakeholders who have been involved in the project since 2004. The mailing contained a DVD with the full-length DEIS, supporting technical reports and a video. It also contained a paper copy of the Guide to the Draft Environmental Impact Statement, which highlighted key findings from the DEIS.

Agency Notification

State and federal resource agencies received a copy of the DEIS by mail as indicated in the DEIS Appendix 3.

Legal Advertisement

An advertisement appeared in the legal notifications of:

- The Lewiston Tribune—Wednesday and Thursday, January 16 and 17, 2013
- Moscow Pullman Daily News—Wednesday, January 16, 2013

Display Ad

ITD designed and placed large advertisements in the news sections of local newspapers on three occasions:

- Display ad #1: Announcement of DEIS availability, viewing locations and public hearing (December 30, 2012)
- Display ad #2: Announcement of public hearing (January 9, 2013)
- Display ad #3: Announcement of public hearing (January 21, 2013)

All three ads ran in the Moscow Pullman Daily News and the Lewiston Tribune. Display ad #1 appeared in the Saturday/Sunday edition of the Moscow Pullman Daily News, which was dated December 29 instead of December 30.

News Releases

News releases were sent to local print, TV and radio media in the weeks before the hearing and the day of the hearing.

DEIS Guide

ITD printed a 16-page Guide to the Draft Environmental Impact Statement in a brochure format. The piece gave an easy-to-read overview of the project, roadway alternatives and the DEIS. It included color maps of each alternative and page numbers for key sections of the DEIS.

DVD and Project Video

Along with the DEIS Guide, ITD mailed a DVD to every person on the project database. The DVD included a seven-minute video regarding the history of the project, the process of developing the environmental document, and important points about each of the roadway alternatives.

Website

The project website included basic project information, the DEIS, technical reports, public hearing information, the project brochure, news releases and the project video. This website was updated following the DEIS hearing.

8 CONSTRUCTION PHASING AND FUNDING

This chapter describes how an Action Alternative, if selected, would be funded and constructed in its entirety. It describes any physical or fiscal constraints associated with implementing an Action Alternative should one be selected.

8.1 Regulatory Framework and Policies

FHWA is required to identify physical and funding limitations associated with constructing an entire project at one time, including phasing and fiscal constraints. NEPA also requires that construction effects be evaluated and disclosed to the public.

8.2 Methodology

The project phasing for this project is consistent with FHWA's objective of analyzing and selecting transportation solutions on a broad enough scale to provide meaningful analysis. Construction phasing was evaluated by considering construction effects of each alternative as applicable. Funding effects were determined by evaluating if the project would need to be phased due to funding or logical construction constraints.

8.3 Construction Phasing

The US-95 Thorncreek Road to Moscow alternatives vary in length from 5.85 miles (E-2) to 6.65 miles (W-4) which are feasible to construct in one construction package. It is the intent of ITD and FHWA to implement the selected alternative in its entirety in one construction phase. However, this section also describes construction phasing should the funding become available in phases.

The following timeline is anticipated but is contingent on completion and approval of the EIS process and funding availability. Construction for any of the Action Alternatives is anticipated to take two full seasons and would begin in the spring of 2016. See Table 70. Project Milestones.

Table 70. Project Milestones

Phase	Year
ROD issued	2015
Preliminary Design begins	2015
Right-of-way Acquisition begins	2015
Final Design begins	2016
Construction begins	2016
Construction completed	2017

Sequencing of the construction activities for this project would largely be dependent on the locations of areas requiring large cuts or excavation of native material and areas requiring large amounts of fill material for the roadway.

While the construction phasing would be determined based on funding, it is expected that the selected alternative would be constructed in one phase in its entirety. Construction of any of the Action Alternatives would most likely begin with the bridge structure and the areas where the road is realigned. In areas where the existing roadway will be widened, building one side of the highway would allow it to operate during construction.

All of the Action Alternatives would utilize commercial material sources. Staging areas, stockpile sites and waste sites would be determined by the contractor. Waste sites and haul roads may be off-site but would be approved by ITD. All construction activities would be completed according to the ITD Standard Specifications (c) with amendments and would comply with applicable laws, regulations, and the environmental commitments listed in Chapter 9, Environmental Commitments.

All transitions and connections to the existing highways, public and private roadways would be designed to AASHTO standards.

8.4 Project Funding

The estimated total project cost for any of the Action Alternatives would range between $55 and $62 million. Engineering is estimated at approximately $1.6 million for any of the Action Alternatives. See Table 71. Cost Estimate for Alternatives.

Table 71. Cost Estimate for Alternatives

Alternative	Construction Cost (million $)*	Total Project Cost (million $)
No Action	Minimal	Minimal
Modified W-4	52	62
C-3	43	58
E-2	46	55

*Note: The estimated cost includes excavation, rock ballast, plant mix, structures, traffic control and illumination. It excludes engineering, construction engineering, mitigation and right-of-way. Land values may be variable between corridors due to land use (agricultural, commercial, and residential)

Funding for construction is currently scheduled for 2016 and 2017 in the amount of $39,929,000.

ITD District 2 has applied for early development grants, and plans to utilize advance construction funds, which may be used at the discretion of ITD District 2.

US-95, Thorncreek Road to Moscow is an Idaho State priority for the remaining funding required for construction. ITD District 2 would continue to apply advance construction funding using the District budgeted amount. ITD District 2 would continue to include funds for this project in future ITIPs. See Table 72. Project Funding.

Table 72. Project Funding

Funding Source or Planning Description	Funding Program	Amount ($)	Funded Activity
ITIP	TEA 21-National Highway (1998-2005)-Federal Aid funds	18,425,490	Construction; Widen Genesee to Moscow
ITIP	Safetea-LU (high priority funds) (2005-present)	1,112,901	Engineering
ITIP	Section 129 Funds	490,000	Construction
ITIP	Transportation Community & Systems Preservation funds (TCSP)	432,000	Engineering
ITIP	MAP-21 National Highway System (NHS) funds	21,016,000	Construction
Total Allocated		**41,172,391**	

Past Funding

Table 73. Federal Highway Funding for the State of Idaho for the State of Idaho shows the history of funding bill allocations. It demonstrates a consistent increase in funding.

Table 73. Federal Highway Funding for the State of Idaho

Federal Funding Bill	Year	Idaho Allocation ($)
TEA-21	1998	174,073,000
	1999	203,441,000
	2000	208,483,000
	2001	209,982,000
	2002	213,867,000
	2003	217,849,000
SAFETEA-LU	2005	260,868,000
	2006	264,199,000
	2007	278,589,000
	2008	288,460,000
	2009	291,823,000

Based on the following evidence it is reasonable to assume that the US-95 Thorncreek Road to Moscow Project would be funded and constructed in its entirety:

- $39,928,000 is designated for project construction in 2017.
- $4,428,321 is designated for project design.
- $1,112,901 is allocated for right-of-way and engineering.
- The cost of right-of-way has been funded in its entirety.
- The project is the highest priority project for ITD District 2 and the District would continue to apply advance construction funding to the project.
- ITD District 2 would continue to include funds for this project in future ITIPs.
- The history of federal and state funding for highways in Idaho has been increasing with each transportation bill.

9 ENVIRONMENTAL COMMITMENTS

Environmental commitments include complying with all federal and state laws and regulations and complying with all project related permits and approvals. ITD also maintains a set of standard specifications that state the requirements and standards for construction of ITD projects. The ITD Standard Specifications (ITD 2012c) and its updates would be used to prepare the contract documents for the construction of the alternative if an Action Alternative is selected.

The ITD Standard Specifications requires that a SWPPP be prepared and implemented for this project. This would include Best Management Practices (BMPs) for protection of wetlands, water quality, floodplains, and other sensitive areas. It requires BMPs for erosion and sediment control, spill prevention, revegetation, and environmental construction compliance monitoring. The most current versions of the ITD Standard Specification for Highway Construction, the ITD Maintenance Manual and Best Management Practices may be found at the ITD website: http://itd.idaho.gov/manuals/manualsonline.htm.

ITD standard specifications also include provisions for:

- Unanticipated discovery of cultural resources
- Preparation of a revegetation plan
- Preparation of a Traffic Control Plan
- Use of weed free materials and noxious weed control on the construction site
- Maintain access to all roadways during construction
- Handling and disposal of waste
- Approval of material sources, waste sites, haul routes, staging areas and stockpile sites
- Control of fugitive dust

ITD also maintains a set of standard drawings that provide guidelines for highway design elements. These standard drawings incorporate several measures that would minimize visual impacts of the project including:

- Reseeding exposed soils with native grasses.
- Farming to the bottom of the ditch on slopes of 4:1 or flatter.
- Creating rounded slopes and gradually tying slopes back to blend with the existing terrain.
- Balancing cuts and fills which would reduce the overall scaring of the landscape.

Avoidance and measures to minimize adverse effects are described in Chapter 4, Environmental Consequences. Table 74. Mitigation Measures are measures that will be implemented in order to compensate for unavoidable effects resulting from the Action Alternatives.

Table 74. Mitigation Measures

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Socio-Economic	Maintain access to and from the right-of-way at existing public road connections and existing approaches.	✓	✓	✓
Socio-Economic	Develop a traffic management plan to ensure customer/supplier access and parking for existing businesses during construction.		✓	
Socio-Economic	Coordinate with city, county and university officials to identify scenic turnout locations, including potential signage for the university and Paradise Ridge.	✓	✓	✓
Socio-Economic	ITD will meet with landowners during the design process to find opportunities to minimize impacts to properties.	✓	✓	✓
Socio-Economic/ Environmental Justice	Coordinate with the Hidden Village/Benson Mobile Home parks and the Woodland Heights Mobile Home Court residents and owners during final design.		✓	✓
Land Use and Recreation	In accordance with the Latah County Comprehensive Plan the project will provide shoulders for bicyclists and pedestrians and sidewalks in the curb and gutter section. The project will follow ITD's Access Management Policy for Expressway access standards, which will only allow access at ITD designated locations. All alternatives will maintain access to Paradise Ridge and other recreational resources.	✓	✓	✓
Farmland	Limit the accesses or approaches on the new US-95 to limit farmland conversion.	✓	✓	✓
Farmland	ITD will work with adjacent landowners and seek to construct farmable slopes that will quickly be converted back to pre-existing uses.	✓	✓	✓

[19] ✓ The described mitigation only applies to the alternative(s) for which the box is checked. A blank box denotes that no mitigation is required for that alternative.

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Floodplains	A No Rise Certification will be completed during the permitting process and before construction. In floodplains without designated floodways, the encroachments will not result in more than a one-foot rise in base flood elevations or affect beneficial values of the floodplain. Any effects to the floodplains will be mitigated. In the floodways, a No Rise certification will certify that the project will result in no increase to base flood elevations. If W-4 or C-3 are selected a CLOMR and/or LOMR will be completed and submitted to FEMA.	✓	✓	
Cultural Resources/Section 4(f) resources	If the W-4 Alternative is selected, a complete archaeological investigation of any previously uninvestigated portion of the alignment will be completed prior to the commencement of any ground-disturbing activities. These investigations may include, but are not limited to, intensive pedestrian survey and subsurface archaeological investigations.	✓		
Floodplains	Floodplain effects will be minimized using engineering solutions such as steepening slopes and constructing culverts to pass a 25-year flood event.	✓	✓	
Floodplains	Any constructed fills or structures in floodplains will be designed to result in no more than a one-foot rise in the base flood elevation.	✓	✓	
Wetlands and Tributaries	Effects to tributaries will be mitigated according to the Compensatory Mitigation for Losses of Aquatic Resources; Final Rule (33 CFR 325 and 33 CFR 332, 40 CFR 230). Affected stream channels and wetlands will be mitigated by using the credits from the Cow Creek Mitigation Area, which has already been constructed. If after detailed design, it is determined that additional impacts and mitigation are required, then the Valencia Mitigation Bank may be used for the additional mitigation requirements.	✓	✓	✓

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Wetlands and Tributaries	BMPs will be installed along the perimeter of the work area during construction and maintained throughout construction to reduce sediment from entering waterways. Highly visible orange fencing will be installed and maintained throughout construction around wetlands and waterways that are not to be disturbed. These areas will not be used for temporary crossings or staging areas. Turbidity testing will occur daily during in water work. Riparian areas disturbed will be reestablished with deep rooted native vegetation that can provide shade from direct sunlight, all chemicals used during construction will be stored away from waterways or will have secondary containment measures in place to minimize the potential for contamination and spills. Channel alteration will provide sinuosity to simulate natural channel paths and reduce scour.	✓	✓	✓
Wetlands and Tributaries	ITD will minimize the impacts to the PSS wetlands during the design and will evaluate the use of engineering solutions such as reducing the fill slopes or using crossings that span the wetlands where practicable to allow for large wildlife movement.			✓
Groundwater	ITD will work with Idaho Department of Water Resources to decommission or restrict well construction within 300 feet of the roadway for the selected alternative.	✓	✓	✓
Vegetation, Fish and Wildlife	If the E-2 Alternative is selected, ITD will monitor AVCs near Paradise Ridge in the identified ungulate crossing area. The monitoring of AVCs will use existing ITD programs including the ITD/IDFG Road Kill & Wildlife Salvage Database, which is a road kill reporting and mapping tool. ITD also evaluates highway accident data annually and identifies high accident locations (HALs) based on the previous three years of crash data. These locations are investigated to determine contributing factors to accidents, including AVCs, and solutions are proposed and programmed. Should it be identified as a problem, ITD will take action to address AVCs and will collaborate with IDFG as needed to identify effective solutions.			✓

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Vegetation, Fish and Wildlife	If disturbed, existing water features (ponds, tributaries or wetlands) will be maintained or replaced away from the roadway to benefit of numerous wildlife species.	✓	✓	✓
Vegetation, Fish and Wildlife	Construct and install bat boxes at selected sites to provide bat roosts. See the Bat Conservation International website at www.batcon.org or Nongame Wildlife Leaflet No. 11 on bats (Wackenhut and McGraw 1996) for details on building a bat house.			✓
Vegetation, Fish and Wildlife	Nuthatch nest boxes will be installed at selected sites near the affected ponderosa pine stands to augment the nesting sites currently available.			✓
Vegetation, Fish and Wildlife	Tree removal will be accomplished between August 2 and March 30 to minimize effects to nesting birds.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will coordinate with IDFG and USFWS to survey the grasslands for nesting activities prior to construction to avoid affecting nesting of migratory grassland birds.	✓	✓	✓
Vegetation, Fish and Wildlife	Under crossings of county roads will be designed to accommodate ungulates and include appropriate wildlife fencing.	✓	✓	✓
Vegetation, Fish and Wildlife	Overpass structures for county roads and culverts for streams and riparian areas will be constructed with adequate width to provide passage of small terrestrial wildlife. This may include potential retrofitting of existing structures where appropriate.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will discuss the possibility of future retrofits of culverts during road improvements along the existing US-95 (loop road) with the NLHD during the road transfer negotiations.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will work with IDFG before final design to determine details of the mitigation measures proposed including culvert sizing for small animal movement, bridge width and clearance for wildlife movement, wing fencing, wildlife fencing, sidewalls and paths, bat and bird boxes and other wildlife considerations. Provisions for wildlife crossings will only be made where wildlife use is expected and where wildlife is welcome on private lands (deer, elk and moose).	✓	✓	✓

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Vegetation, Fish and Wildlife	Where practicable, culvert designs may include box culverts, bottomless box culverts, and corrugated metal culverts placed at grade or the use of stream simulation designs. This may include potential retrofitting of existing structures where appropriate.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will work with local weed experts before final design to develop a project seed mix designed to compete against weed establishment and infestations and to discourage wildlife foraging near the roadway. The seed mix will be used on all appropriate disturbed areas within project limits.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will work with USFWS, IDFG and the Latah County Conservation District to salvage native trees and shrubs that may be removed for construction as practical, and to make them available for use in local restoration projects.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will implement its Vegetation Management Plan in conjunction with USFWS, IDFG and landowners within the project area. This may include providing funds to landowners for weed control in prairie restoration sites, constructing farmable slopes to minimize weed establishment and spread, and revegetating slopes and fills with native grasses and forms to minimize weed establishment and spread along the roadway. Species will be determined in consultation with USFWS and NRCS to help ensure compatibility and successful establishment.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will implement their Vegetation Management Plan, which includes measures to control of weeds and roadside vegetation. ITD will work with USFWS, IDFG, NRCS, Latah County Conservation District and landowners before final design to implement additional weed control measures targeted towards Palouse remnants and restoration sites within 0.6 miles of the selected alternative. ITD will also monitor the success of weed and vegetation control measures and adapt them as necessary.	✓	✓	✓
Vegetation, Fish and Wildlife	ITD will consult with IDFG before final design about possible installation of special reflective posts or delineators near the highway for protection of Short-Eared Owls.			✓

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Vegetation, Fish and Wildlife	ITD will install day and night roosting facilities; Roosting installations will be relocated away from the highway to reduce collisions. New structures will be designed without sealed joints to discourage roosting.			✓
Vegetation, Fish and Wildlife	Waste, material, staging and stockpile areas will be identified by the contractor and approved by ITD before construction activities begin. Sensitive areas that should be avoided will be identified in consultation with agencies and will be indicated on plan sheets to be retained and protected. Material sources will be commercial sites and therefore will be in compliance with applicable laws and regulations. The staging and stockpile sites are expected to be within the existing alternatives'' footprints.	✓	✓	✓
Threatened and Endangered Species	If streams need to be realigned, adequate drainage facilities will be maintained without interruption and prior to construction.	✓	✓	✓
Threatened and Endangered Species	Ground disturbing activities will occur during the dry season to minimize the potential for introducing sediment to ephemeral streams and to control erosion in the Project Area.	✓	✓	✓
Threatened and Endangered Species	Sediment fences will also be installed between areas of disturbance and ephemeral streams, and will be cleaned regularly to maintain function.	✓	✓	✓
Threatened and Endangered Species	Immediately (no longer than 30 days) after construction activities are completed in an area, alll disturbed areas adjacent to the highway will be treated with tackifier or similar methods to minimize weed establishment or will be seeded according to Standard Specification 621 during the ITD approved seeding window.	✓	✓	✓
Threatened and Endangered Species	To minimize the potential for introducing hazardous materials to ephemeral streams in the project area, precautionary measures will be taken to reduce the risk of spills. A spill prevention and contingency plan will be prepared by the construction contractor, approved by ITD prior to construction, and submitted to EPA prior to project implementation.	✓	✓	✓
Threatened and Endangered Species	All staging, stockpiling, fueling, storage, wasting, and maintenance areas will be located away from ephemeral streams and adequately buffered from drainage areas by at least 150 feet.	✓	✓	✓

Resource	Mitigation Measure	Mitigation for Alternative[19]		
		Modified W-4	C-3	E-2
Threatened and Endangered Species	In case of emergency, a hazardous materials spill kit will be kept on site during construction that is appropriate for the solvents involved in operation and maintenance of vehicles and machinery used during the project.	✓	✓	✓
Threatened and Endangered Species	If additional Spalding's catchfly surveys discover the species at any remnant locations that may be affected by selected alternative, ITD will work with the USFWS to establish appropriate vegetation management practices suitable for the location and the species occurrence.	✓	✓	✓
Transportation	ITD will request a Road Closure Maintenance Agreement from the local agency (NLHD) on any existing roadway that will be abandoned as part of new US-95 alignment. ITD will negotiate the transfer of existing US-95 loop road to NLHD. Once the agreement has been signed all documents pertaining to that section of roadway (right-of-way plans and descriptions, roadway plans and agreements) will be turned over to the local agency.	✓	✓	✓
Transportation	ITD will coordinate with the City of Moscow regarding the undeveloped City street access and the accommodation of the proposed Ring Road project.	✓	✓	✓
Visual Quality	ITD will implement measures to help blend highly visible roadway features with the setting through measures such as use of native grass species, balancing cut and fills, and painting metal beams to blend with the surrounding environment.	✓	✓	✓
Visual Quality	ITD will utilize specific geotechnical information and topographic survey data to more specifically design cuts and fills and look for opportunities to minimize the visual impacts of the project.	✓	✓	✓
Hazardous Materials	A Phase II Hazardous Materials Study will be completed during preliminary and final design to identify sites requiring cleanup and special handling and disposal of hazardous materials. If there are sites requiring hazardous materials cleanup, that work will be accomplished by a qualified contractor specializing in hazardous materials cleanup before or during construction	✓	✓	✓
Hazardous Materials	Demolition of structures will be in compliance with applicable laws and regulations regarding lead and asbestos.	✓	✓	✓

10 RESPONSE TO COMMENTS ON THE DEIS

10.1 Regulatory Framework

23 CFR 771.125 states that the FEIS shall discuss substantive comments received on the DEIS and provide responses to them.

10.2 Summary of DEIS Comments

ITD received 400 comments on the US-95, Thorncreek Road to Moscow DEIS during the public comment period. Comments were coded and numbered according to how the comment was received. The comments received are broken out below:

- Comment forms from hearing (H): 115
- E-mails (E): 121
- Letters (L): 107
- Open microphone during hearing (OM): 40
- Verbal testimony during hearing (V): 17

Written responses are provided for substantive comments and are presented in this section and in the FEIS. The responses point out new or revised analyses, clarifies unclear information, corrects information and provides additional information as necessary. If an Action Alternative is selected, coordination will continue with affected property owners as part of the ongoing preliminary design and project development process. Formal responses were not provided for comments agreeing with DEIS information or statements, general opinions, statements of fact, or statements of preference.

Several comments from the public were repeated and general responses to these are presented in Section 10.3 General Responses to Issues. Each commenter also received an individual response, which refers to the appropriate General Response, indicates corrections, changes or new information in the FEIS or provides a specific unique response. The list of commenters with comment numbers is shown in Table 75. List of Comments Received. If commenter's full names are not known, the FEIS will be delivered to the address or email provided in the comment but will also be available at public viewing locations.

Table 75. List of Comments Received

#	First Name	Last Name	Firm/Representing
Public Hearing Comment Sheets (received January 23, 2013)			
H-1	Mike	Hubbard	
H-2	Marshall	Comstock	
H-3	Charles	Guthrie	
H-4	Jim	Prall	
H-5	Fred	Gittes	
H-6	Janice and Larry	McMillan	
H-7	Jerry	Schutz	
H-8	Robert	Hoffman	
H-9	Judy	Sobeloff	
H-10	Greg Freistadt	Mack	
H-11	Pat	Fuerst	
H-12	Thomas	Hubbard	
H-13	L. Roger	Falen	
H-14	No name		
H-15	Margaret	Dibble	
H-16	Louise	Regelin	
H-17	Dave	Sherman	
H-18	Otto	Keyes	
H-19	Donald G.	Ball	
H-20	Bernie	Hermann	
H-21	Jim	Knecht	
H-22	Diane	Baumgart	
H-23	Jim	Lion	
H-24	Bonnie	Thompson	
H-25	Sarah	Holup	
H-26	Dennis	Ownbey	
H-27	Wanda	Ownbey	
H-28	Van	Thompson	
H-29	BJ	Swanson	Latah Economic Development Council
H-30	Karen L.	Colson	
H-31	Emma	Schmidt	
H-32	Duane	Roach	S.L.H.D.
H-33	Catherine	Mabbutt	
H-34	Lisa	Kliger	
H-35	Elaine	Broyles	
H-36	Kevin	Renfrow	South Latah Hwy District

#	First Name	Last Name	Firm/Representing
H-37	Louise	Sweeney	
H-38	Becky	Paull	
H-39	Dan	Pierce	
H-40	Gerard	Connelly	
H-41	Ann	Storrar	
H-42	Jim	Roach	
H-43	Dawn	Fazio	
H-44	Gail	Byers	
H-45	Jim	Fazio	
H-46	George	Masters	
H-47	March	Blackburn	
H-48	John	Sweeney	
H-49	Randy	Hayes	
H-50	Norm	Metzker	
H-51	James P.	Huggins	
H-52	Tom	Anderson	
H-53	Claire	Anderson	
H-54	Robert	Dupea	
H-55	Don	Meyers	Moscow Transportation Commission
H-56	Gaylynn	Clyde	
H-57	Diane	Dupea	
H-58	Ned B.	Klopfenstein	
H-59	Jerry	Exon	
H-60	Wayne and Jacio	Jensen	
H-61	May	Huberty	
H-62	Doug	Olson	
H-63	D.S.	Seegmiller	
H-64	Jason	Lefler	
H-65	Diane	Baumgart	
H-66	Randy	Hayes	
H-67	Mary	Steed	
H-68	Katherine	Masters	
H-69	Jim	Macdonald	
H-70	Diane	Baumgart	
H-71	Constance	Dickow	
H-72	William T.	Greene	
H-73	Mike	Hoobler	
H-74	Don	Strong	

#	First Name	Last Name	Firm/Representing
H-75	Zachary	Johnson	
H-76	Dan and Gail	Schoenberg	Self/ Palouse Properties
H-77	Dick	Adams	
H-78	Lisa	Gadwa	
H-79	Rita	Jacksha	
H-80	Marsha	Schoeffler	
H-81	Tom	Jacksha	
H-82	Ron	Crumley	
H-83	Matt	Telin	
H-84	Gabe	Gibler	
H-85	Doug	Anderson	Latah County Sheriff
H-86	Kathy	Gak	Latah Co Dispatch
H-87	Kennan	Storrar	
H-88	Ed	Coulter	
H-89	Alan C.	Baker	
H-90	James	Ware	
H-91	Edwin P.	Garretson	
H-92	Wayne	Olson	
H-93	Nancy	Matthews	
H-94	Gary	Deetsen	
H-95	Doug	Gadwa	
H-96	Guy	Hopkins	
H-97	Greg	Freistadt	
H-98	Meg	Foltz	
H-99	Mat	Demers	
H-100	Andy	Hudak	
H-101	Ted	Allegri Jr.	
H-102	Steven	Basoa	
H-103	Gerald and Judy	Reisenauer	
H-104	Don	Blair	
H-105	Rodney and Shelley	Dale	
H-106	George	Alderman	
H-107	Susan	Strout	
H-108	Steven	Barr	
H-109	No name		
H-110	LeNelle	McInturff	
H-111	Jim	Dahmen	
H-112	Leonard T.	Hetsler	

#	First Name	Last Name	Firm/Representing
H-113	Robert	Haag	
H-114	Nora	Locken	
H-115	William T.	Gibson	
Emails (received between January 4 and March 25, 2013)			
E-1	Alison	–	
E-2	Amy	Conway	
E-3	Ashleigh	Bright	
E-4	Bill	Perconti	
E-5	Dale	Newberry	
E-6	Dan	Rathmann	
E-7	Debi	Zenner	
E-8	Del	Hungerford	
E-9	Del	Hungerford	
E-10	Delitha and Dwight	Kilgore	
E-11	Donald G.	Sinclair	
E-12	Del	Hungerford	
E-13	David	Hall	
E-14	Jim	McIver	
E-15	Jim	Roach	
E-16	John	Bindl	
E-17	Karl	Johnson	
E-18	Kasey	Dennler	
E-19	Kim	Salisbury	
E-20	Kristin	Johnson	
E-21	Karen	Parvin	
E-22	Lloyd	Mues	
E-23	Lois	Johnston	
E-24	Martha	McIver	
E-25	Mary Jane	Bailey	
E-26	Merry Kim	Mues	
E-27	Michael	Jennings	
E-28	Myron	Emmerson	
E-29	Nancy	Carter	
E-30	Neil Marzolf & Ramirose	Attebury	
E-31	David	Sarff	
E-32	No-name		
E-33	No-name		
E-34	Nora	Locken	

#	First Name	Last Name	Firm/Representing
E-35	Rita	Bindl	
E-36	Susan	Somers	
E-37	Thomas	Brandt	
E-38	Wayne	Olson	
E-39	Wayne	Olson	
E-40	Wendy		
E-41	Zachary	Johnson	
E-42	Shelley L.	Bennett	
E-43	Robert	Heckendorn	
E-44	Cathy B.	Porter	
E-45	Jack R.	Porter	
E-46	Bill	Belknap	Community Development Director
E-47			City of Moscow-Public Works
E-48	Abbie	Acuff	
E-49	Bill	Caldwell	
E-50	Brad	Jaeckel	
E-51	Glenda	Bull	
E-52	Helen S.	Stroebel	
E-53	Joan	Klingler	
E-54	John	Crock	
E-55	Dan	Rathmann	
E-56	Sarah	Ullrich	
E-57	Bruce	Taylor	
E-58	Wayne	McProud	
E-59	David and Molly	Hallock	
E-60	Debra	Ellers	
E-61	Don	Kaag	
E-62	Jeff	Handel	
E-63	Jim	Roach	
E-64	Karen	Jennings	
E-65	Patricia	Rathmann	
E-66	Susan	Calvert	
E-67			Palouse Environmental Sustainable Coalition (PESC)
E-68	Tanya	Gale	
E-69	Carol	Mayer	
E-70	Christopher	LaPaglia	
E-71	Daniel R.	Miller	

#	First Name	Last Name	Firm/Representing
E-72	Jim	Bloomfield	
E-73	John	Snyder	
E-74	LeNelle	McInturff	
E-75	Mary	Fauci	
E-76	Tom	La Pointe	
E-77	Carolyn	Hovde Bohach	
E-78	Don & Twila	Brown	
E-79	Joanna	Holder	
E-80	Keith	Smith	
E-81	March	Hume	
E-82	Mary	Ullrich	
E-83	Mary	Ullrich	
E-84	Myron	Molnau	
E-85	Mark	Coleman	
E-86	Chad	Crow	
E-87	Gary	Cummings	
E-88	Nancy Chaney	Gary Bryan	–
E-89	Sandy	Ketelsen	
E-90	Mary	Ullrich	
E-91	Jim	Roach	
E-92	Richard C.	Heimsch	
E-93	Amy	Conway	
E-94	Anthony		
E-95	Antone G.	Holmquist	
E-96	Cathy	Willmes	
E-97	Cheyenne	Smith	
E-98	Dan and Patricia	Rathmann	
E-99	Wendy and David	Waltner	
E-100	Diane	Baumgart	
E-101	Donn	Morse	
E-102	Duane	Dale	
E-103	Garrett	Clevenger	
E-104	Hugh	Martin	
E-105	John	DeGroot	
E-106	Louise M.	Davison	
E-107	Lucille A.	Scott	
E-108	Margrit	Von Braun	
E-109	Mark E.	Wray	

#	First Name	Last Name	Firm/Representing
E-110	Mark	Townsend	
E-111	Mary	DuPree	
E-112	Nancy	Carter	
E-113	Neil Marzolf & Ramirose	Attebury	
E-114	Patrick	Baird	
E-115	Rami	Attebury	
E-116	Romney	Boehm	
E-117	Brent	Knapp	
E-118	Stephen D.	Redinger	
E-119	Susan	Westervelt	
E-120	Suvia	Judd	
E-121	Thomas	Besser	
Open-Microphone Testimony (received January 23, 2013)			
OM-1	Jim	MacDonald	
OM-2	Jack	Flack	Snow Farms Inc./Friends of Highway 95
OM-3	Johame	Muneta	
OM-4	Farrell	Byington	
OM-5	Neil	Marzolf	
OM-6	Willa	Geffre	
OM-7	Nora	Locken	
OM-8	Gerald	Connelley	
OM-9	Dan	Schoenberg	
OM-10	Susan	Flack	Snow Farms
OM-11	Jim	Anderson	Greater Moscow Alliance
OM-12	Al	Poplawski	Paradise RidgeDefense Coalition
OM-13	Tim	Hatten	Palouse PrairieFoundation
OM-14	Mary	Ullrich	
OM-15	Steve	Ullrich	
OM-16	Janice	Willard	
OM-17	Cindy	Magnuson	
OM-18	John	Snyder	Great Old Broads (resident for wilderness)
OM-19	Pamela	Brunsfeld	
OM-20	Zachary	Johnson	
OM-21	David	Sass	
OM-22	Del	Hungerford	
OM-23	Gary	Lester	Benson's Mobile Home Park
OM-24	Jim	MacDonald	

#	First Name	Last Name	Firm/Representing
OM-25	Laurel	MacDonald	
OM-26	Cass	Davis	
OM-27	Frank	Merickel	
OM-28	Brett	Haverstick	
OM-29	Heather	Stout	
OM-30	Jack	Flack	
OM-31	Donald	Arceneaux	
OM-32	David	Hall	
OM-33	Wayne	Olson	
OM-34	Greg	Meyer	
OM-35	John	Crock	
OM-36	Brian	Funke	
OM-37	Kristen	Lapaglia	
OM-38	Mark	Riendeau	
OM-39	Steve	Flint	
OM-40	Ray	Richmond	
Verbal Testimony from Public Hearing (received January 23, 2013)			
V-1	Ted	Allegri	
V-2	Jim	Miller	
V-3	Neil	Marzolf	
V-4	Diane	Baumgart	
V-5	Don	Meyer	
V-6	Roy	Druffel	
V-7	Steve	Barr	
V-8	John	Thomas	Hidden Village Mobile Home Court
V-9	Jack	Flack	
V-10	Susan	Flack	
V-11	Sandy	Blair	
V-12	Bill	Nash	
V-13	Gail	Byers	
V-14	Norm	Metzker	
V-15	Steven	Redinger	
V-16	Buddy	Henson	
V-17	Alison	Tompkins	
Letters (received between January 4 and March 25, 2013)			
L-1	Steven M.	Watson	
L-2	Selma	Yocom	
L-3	Norbert and Janelle	Niehenke	

#	First Name	Last Name	Firm/Representing
L-4	Jim	Anderson	Greater Moscow Alliance
L-5	Stephan	Flint	
L-6	Robert E.	Clyde	
L-7	Farrell	Byington	
L-8	Karen	Bylington	
L-9	Don and Maureen Taylor	Regan	
L-10	Keith G.	Haley	
L-11	Debbie Loaiza, B.J. Swanson and Robin Ohl	–	Latah Economic Development Council
L-12	Cindy	Magnuson	Great Old Broads for Wilderness
L-13	Joann	Muneta	
L-14	M. Duane	Nellis	University of Idaho President
L-15	Jim	Macdonald	
L-16	Al	Espinosa	
L-17	Jim	McIver	
L-18	Brent	Knapp	
L-19	Cass	Davis	Paradise Ridge Defense Coalition
L-20	Jack S.	Hammond	
L-21	Brad	Halter	
L-22	Frank and Cathy	Merickel	
L-23	John and Christie	Thomas	
L-24			Citizens for Safe 95
L-25	Ian	Von Lindern	
L-26			US Department of the Interior-Office of Environmental Policy and Compliance
L-27	Kas and Deborah	Dumroese	
L-28			US Environmental Protection Agency Region 10
L-29	David	Hall	
L-30	Brad	Smith	Idaho Conservation League
L-31			Idaho Department of Fish and Game
L-32	Lahde	Forbes	
L-33	Ian	Von Lindern	Citizens for Safe 95
L-34	Margrit	VonBraun	
L-35			Palouse PrairieFoundation Board of Directors
L-36	Shirley G.	Ringo	Idaho House of Representatives (District 5)
L-37	David M.	Skinner	

#	First Name	Last Name	Firm/Representing
L-38	Wayne and Jacie	Jensen	
L-39			Paradise Ridge Defense Coalition
L-40	Michael	Haseltine	
L-41	Ray and Nancy	Richmond	
L-42	Steve and Mary	Ullrich	
L-43			Paradise Ridge Defense Coalition (petition #1)
L-44	William H.	Goesling	
L-45	Gloria	Taylor	Citizens for a Safe 95 (includes petition)
L-46	Karen Knoff	Malena Braatne	–
L-47	David and Darla	Port	
L-48	Al Gary	Poplawsky Mcfarlane	Palouse Group of Sierra Club and Friends of the Clearwater
L-49	James and Zoe	Cooley	
L-50	Audrey	Squires	
L-51	Chad	Hansen, Jr.	
L-52	Emma	Gregg	
L-53	Steven	Peterson	
L-54	Sebastian	M.	
L-55	Daniel	Orfe	
L-56	Evan		
L-57	Levi		
L-58	David P.	Couch	
L-59	David	Stowers	
L-60	Sherman and Janice	Clyde	
L-61	Norm	Metzker	
L-62	Marilyn	Johnson Jr.	
L-63	Henrianne	Westherg	
L-64	Kevin	Poole	City of Lewiston
L-65			Paradise Ridge Defense Coalition (petition #2)
L-66	Christina	Baldwin	
L-67	Stephan	Flint	
L-68			Green Sanctuary Committee of the Unitarian-Universalist Church of the Palouse (signed by 5)
L-69	Stephan	Flint	
L-70	Mary	Ullrich	

#	First Name	Last Name	Firm/Representing
L-71	Diana	Armstrong	
L-72	Jason W.	Lyon	
L-73	Rachel JT.	Lyon	
L-74	Bill	Stillmon	Excel Transport, Inc. (owner)
L-75	Jerry	Kriegel	Excel Transport, Inc. (form letter)
L-76	---		Excel Transport, Inc. (form letter)
L-77	Michael Alan	Haag	Excel Transport, Inc. (form letter)
L-78	R---	O---	Excel Transport, Inc. (form letter)
L-79	Carmen	LaMontague	Excel Transport, Inc. (form letter)
L-80	Donald R.	Spears	Excel Transport, Inc. (form letter)
L-81	Neal	M---	Excel Transport, Inc. (form letter)
L-82	Walter	---	Excel Transport, Inc. (form letter)
L-83	Jeff	M---	Excel Transport, Inc. (form letter)
L-84	Joe	Fiedler	Excel Transport, Inc. (form letter)
L-85	Richard C.	Haaland	Excel Transport, Inc. (form letter)
L-86	Maxine	Thompson	Excel Transport, Inc. (form letter)
L-87	Donald	M---	Excel Transport, Inc. (form letter)
L-88	---	---	Excel Transport, Inc. (form letter)
L-89	Roger	York	Excel Transport, Inc. (form letter)
L-90	---	---	Excel Transport, Inc. (form letter)
L-91	Jack	L--	Excel Transport, Inc. (form letter)
L-92	Wallace B.	G--	Excel Transport, Inc. (form letter)
L-93	Ben	V--	Excel Transport, Inc. (form letter)
L-94	Shawn	Thompson	Excel Transport, Inc. (form letter)
L-95	Levi J.	Kimball	Excel Transport, Inc. (form letter)
L-96	Steve	More	Excel Transport, Inc. (form letter)
L-97	B--	--	Excel Transport, Inc. (form letter)
L-98	Chad C.	Richardson	Excel Transport, Inc. (form letter)
L-99	---	---	Excel Transport, Inc. (form letter)
L-100	Frank	---	Excel Transport, Inc. (form letter)
L-101	Mark C. and Dori K.	Jackson	Excel Transport, Inc. (form letter)
L-102	Jody	Arrington	Excel Transport, Inc. (form letter)
L-103	David E.	---	Excel Transport, Inc. (form letter)
L-104	Gayle L.	Painter	Excel Transport, Inc. (form letter)
L-105	Jeff	Hilbert	Excel Transport, Inc. (form letter)
L-106	Kevin R.	Byers	Excel Transport, Inc. (form letter)
L-107	Cameron	Solberg	Excel Transport, Inc. (form letter)

10.2.1 General Responses to Issues

Several DEIS comments were repeated and a general response has been prepared to address the comments. The responses to individual comments may reference the general comments and responses in Table 76. General Responses to Issues.

Table 76. General Responses to Issues

General Response Name	General Comment	General Response
Access	What will the access be for the new highway? How will access control be enforced? Will growth along the highway result in more approaches and accesses and worsened safety for the alternatives?	The access control for this segment of US-95 is currently Statewide Access Control. The proposed US-95 Action Alternatives were designated as Expressway Access Control through an Idaho Transportation Board action on January 15 & 16, 2014. (See the Safety Analysis Technical Report for the agenda and board minutes). Expressway Access Control is a segment of a highway designated by the Idaho Transportation Board for use as a through highway, with partially controlled access, accessible only at locations specified by ITD, and characterized by medians, limited at-grade intersections, and high speeds. An existing segment of state highway may only be designated as an expressway if payment is made to adjacent property owners for the restriction of existing access rights [IDAPA 39.03.42]. While the District Engineer has the authority to approve a decrease in the spacing requirements for other access types, the Expressway Access Control does not have spacing requirements; therefore, access is allowed only at locations designated by ITD which will be determined in collaboration with the landowner during the right-of-way process. This is stated in the IDAPA 39.03.42 Section 400.03, which is reflected in ITD's 0606 Form for Current Access Purchase Determination. A blank sample of the ITD 0606 Form that would be used is provided in the Safety Analysis Technical Report. ITD will be required to comply with their access policy and will have the regulatory power to limit access. The FHWA and ITD would purchase access rights in accordance to Idaho Board Policy-4005, which incorporated the recently revised IDAPA Rule 39.03.42 *Rules Governing Right-of-Way Encroachments on State Rights-of-Way* and *Management of Department-Owned Property*. The appraiser will perform a before and after appraisal that will specifically address the access. The deed for the properties will specify the access points at specific locations discussed with the property owner stating width, location and the type of use of the access. This is expected to reduce development pressures and associated environmental impacts along the new highway alignment and preserve the safety benefit of the alternatives. Ultimately, development is regulated by land use planning agencies in the City of Moscow and Latah County. See FEIS Chapter 6, Indirect and Cumulative Effects. Additional information was added regarding past, present, and reasonably foreseeable future impacts to Paradise Ridge and Palouse remnants as a result of the project. Expressway Access Control is discussed in the FEIS, Sections ES.6, 2.4.2 and 4.10.3.

General Response Name	General Comment	General Response
Agency	Idaho Department of Fish and Game (IDFG), US Environmental Protection Agency (EPA), and the US Fish and Wildlife Survey (USFWS) prefer the central route. Why did ITD identify the E-2 Alternative as their Preferred Alternative?	The IDFG, EPA and USFWS expressed support for the C-3 Alternative based upon their respective missions to prioritize natural resources including wildlife, water resources and threatened and endangered species. National Environmental Policy Act (NEPA) requires FHWA and ITD to evaluate and consider the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. See DEIS and FEIS Section 1.4. See the DEIS and FEIS Section 2.6, Preferred Alternative for additional information regarding why the E-2 Alternative was identified as ITD's and FHWA's Preferred Alternative. Although individual resource agencies and others focus on their specific resource issues, FHWA and ITD have avoided and minimized the overall environmental impacts as practicable and will implement the mitigation measures outlined in the FEIS Chapter 9, Environmental Commitments to further mitigate the environmental impacts. ITD met with IDFG during the FEIS development and agreed upon the mitigation measures described in Chapter 9, Environmental Commitments. ITD will collaborate with IDFG on refining the details of mitigation before final design to help ensure mitigation success. For clarification, the US Army Corps of Engineers did not support or object to any of the alternatives. They will make their decision regarding the Least Environmentally Damaging Practicable Alternative (LEDPA) during the project permitting process and after the Section 404(b)(1) Analysis has been completed.
Alternative	Why did FHWA and ITD identify the E-2 Alternative as their preferred alternative?	The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural resource impacts with the public need for a safe and efficient transportation system. Some of the considerations are: • It would have the greatest safety improvement • It would have the fewest access points • It would have the shortest length of five lane section and therefore would be safer • It would have the least effect to streams • It would avoid effects to cultural/Section 4(f) resources, floodplains and business impacts. The primary disadvantages of E-2 compared to the other alternatives are that it would be located along the base of Paradise Ridge and would be closer to it but would not go over it. This could increase weed establishment and spread up to 0.6 miles from the roadway. Paradise Ridge provides moderate or marginal ungulate habitat and E 2 would affect pine stands that offer long-

<table>
<tr><th>General Response Name</th><th>General Comment</th><th>General Response</th></tr>
<tr><td></td><td></td><td>eared myotis, northern alligator lizard and pygmy nuthatch habitat. See General Response NEPA for detail regarding the NEPA process.</td></tr>
<tr><td>Displacement-1</td><td>Why were there inconsistencies between the number of displaced residences and businesses published in the DEIS and what was communicated by ITD's right-of-way staff during the public hearing?
–</td><td>ITD reviewed the residential and business displacements after the public hearing. The displacement numbers in the DEIS are based on a conceptual level of detail using conservative estimates; however, they were correct based upon the assumptions used at the time. Determination of exact displacements requires a greater level of detail than is available at this time because detailed topographic, survey data; geotechnical information and design detail is currently not available. If an action alternative is selected, then the design process would use specific topographic, detailed survey data and geotechnical information to determine right-of-way needs and design detail. ITD will work with landowners and business owners one-on-one during the right-of-way and design processes to explore engineering solutions that could minimize visual or other proximity impacts. All residents and property owners will be compensated equitably according to the Uniform Relocation Act.
The assumptions and terminology for residential and business effects were reviewed and revised in the FEIS. Residential and business effects are now described as "impacts" and "potential impacts". An "impact" was considered to be when the conceptual level alignment cut and fill boundaries and right-of-way encroached upon a structure, well, septic, access or otherwise appears to substantially impair the property so that relocation is assumed. A "potential impact" was considered where the conceptual level alignment cut and fill boundaries and right-of-way falls close to a structure, well, septic, access or other important property features and have the potential to result in impact but does not physically encroach upon it so relocation is not assumed. The residential and business effects are shown in the tables below:
Table 75. Residential Effects
<table>
<tr><th>Alternative</th><th>DEIS Residential Displacement</th><th>FEIS Residential Impacts</th><th>FEIS Potential Residential Impacts</th></tr>
<tr><td>No Action</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>W-4/Modified W-4</td><td>3</td><td>3</td><td>2</td></tr>
<tr><td>C-3</td><td>7</td><td>2</td><td>5</td></tr>
<tr><td>E-2</td><td>5</td><td>7</td><td>6</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>General Response Name</th><th>General Comment</th><th>General Response</th></tr>
<tr><td></td><td></td><td>
Table 76. Business Effects
<table>
<tr><th>Alternative</th><th>DEIS Business Displacements</th><th>FEIS Business Impacts</th><th>FEIS Potential Business Impacts</th></tr>
<tr><td>No Action</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>W-4/Modified W-4</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>C-3</td><td>8</td><td>0</td><td>8</td></tr>
<tr><td>E-2</td><td>0</td><td>0</td><td>0</td></tr>
</table>
The revised numbers resulted in relative differences in the residential and business impacts so that the C-3 Alternative would have 5 fewer residential impacts than the E-2 Alternative and 8 potential business impacts. The Green Acres RV Park spaces were counted as one business impact. The potential business impacts include; Mr. Cabinet, an RV park, Singar Inc., and home based businesses. The residential and business effects are revised in the FEIS Sections ES.6, 2.6, and 4.1 and 4.12. Indirect and cumulative effects are discussed in the FEIS Chapter 6. See Appendix 5, Uniform Relocation Act for detail regarding the requirements under the Act.
</td></tr>
<tr><td>Displacement-2</td><td>There are inconsistencies in numbers of residential and business displacements between different parts of the documents. E.g., C-3 eliminates 7 residences in Table 8 of the DEIS but only 3 in the Screening of Alternative document on page 17.</td><td>The FEIS distinguishes the residential and business right-of-way impacts by categorizing them into term “impact” and “potential impact” . Determining exact displacements requires a greater level of detail than is currently available. The differences between displaced residences and businesses that are referenced in the comments differ because Table 8 of the DEIS refers to the displacements from the alternatives analyzed in the DEIS while page 17 refers to the 11 initial alternative alignments which were screened, which had different project limits, a more conceptual level of detail without cut and fill lines, and with differing assumptions for what constituted a displacement. This difference in numbers of displacements is explained in the DEIS Section 2.5.1, in the middle of page 39. “It should be noted that the lengths of the W-4, C-3 and E-2 alternatives early in the screening process differ from the lengths analyzed in the DEIS due to a modification of the project limits. As a result, the lengths and calculations presented during the screening process may differ from those presented in this FEIS for the Modified W-4, C-3 and E-2 alternatives.” The DEIS, page 53 and The footnote to Table 8, Summary of Alternatives’ Benefits and Effects at the top of page 54 also make similar statements. This statement has been further clarified to explain the differences in the assumptions for what constituted a displacement. The displacements and differences in the numbers are clarified in the FEIS Sections 4.1. The</td></tr>
</table>

General Response Name	General Comment	General Response
		discrepancy between displacement numbers in the DEIS has been corrected. Displacements of the noise receptors were reviewed and updated based upon the changes to the assumptions for residential and business impacts and potentially impacted residences and business structures. There are some residential structures and trailer spaces that were not listed as noise receptors because there were no permanent structures when monitored. Noise-impacted receptors that meet the FHWA noise abatement criteria but would be physically impacted and assumed not to exist after construction were noted. Those structures that would only be potentially impacted were assumed to exist after construction. This information was reconciled and explained in the different FEIS sections. See the FEIS Section 4.12. The impacts and potential impacts in the Noise Analyses were also corrected.
Maintenance-1	Will the remaining US-95 loop be maintained? How much will winter maintenance cost?	ITD will negotiate the transfer of ownership of the remaining US-95 loop to the North Latah Highway District (NLHD). If the NLHD accepts ownership of the remaining US-95 loop, they will be responsible for safely maintaining it. The NLHD budgets consist of revenues from local, state and federal funding sources, which are used for road maintenance, such as plowing and dust control, equipment maintenance and labor costs. Funding for maintenance is allocated based on priorities and annually approved budgets, which would also consider the remaining US-95 loop. The additional pavement may eventually require improvements over the long term; however, the lower traffic volumes and reduced truck travel on the remaining US-95 loop would result in less overall maintenance requirements. Information regarding alignment lengths and the lengths that may be turned over to NLHD is in the DEIS Summary of Alternatives. Additional information regarding total pavement length by alternative and maintenance has been added to the FEIS, Section 4.10. The NLHD crews currently travel through this section of US-95 during winter maintenance of the county roads; therefore, additional mobilization costs for winter maintenance would not be substantial. Also see DEIS and FEIS Section 4.15 for a discussion of maintenance energy effects.
Maintenance-2	Will the remaining US-95 loop continue to have the existing safety hazards?	ITD will negotiate the transfer of the remaining US-95 loop with the NLHD. While it is not known yet what the conditions of the transfer will be, NLHD will be responsible for safely maintaining it as part of their local roadway system. While some of the remaining deficiencies may still be present on the existing US-95 loop, the traffic volumes will be reduced by 95 to 97 percent depending on the alternative and the numbers of crashes are predicted to decrease significantly. See the Revised Safety Analysis (ITD 2013).

General Response Name	General Comment	General Response
NEPA	What is the required environmental process?	FHWA and ITD are required to follow the National Environmental Policy Act (NEPA) of 1966 as amended and the FHWA NEPA implementing regulations [23 CFR 771]. NEPA requires Federal agencies to prepare environmental impact statements (EISs) for major Federal actions that significantly affect the quality of the human environment and consider the effects of the alternatives. As stated in the DEIS and FEIS, Chapter 1, the US District Court for the District of Idaho in the judgment for Civil Case number 03-0156-S-BLW decided an EIS would be required for the northern 4.6 mile segment between Thorncreek Road and Moscow to allow full consideration of the impacts by the public and agencies. An EIS is a full disclosure document that details the process through which a transportation project was developed, includes consideration of a range of reasonable alternatives, analyzes the potential impacts resulting from the alternatives, and demonstrates compliance with other applicable environmental laws and executive orders. FHWA TA 6640.8A NEPA Implementation-Guidance for Preparing and Processing Environmental and Section 4(f) Documents provides detailed guidance on the preparation of the EIS. Four milestones in the EIS process are listed below. 1. Notice of Intent (NOI) 2. Draft EIS (DEIS) 3. Final EIS (FEIS) 4. Record of Decision (ROD) The NOI was published in the Federal Register by FHWA in November 2003 and signaled the initiation of the EIS process. Scoping, an open process involving the public and other federal, state and local, agencies, identified the major and important issues for consideration during the study. Public involvement and agency coordination has continued throughout the entire process. See FEIS Chapter 7, Public Involvement and Agency Coordination, for details. The DEIS provided a detailed description of the proposal, the purpose and need, a range of reasonable alternatives, the affected environment, and presented analysis of the anticipated beneficial and adverse environmental effects of the alternatives. The DEIS evaluated the No Action, W-4, C-3 and E-2 alternatives in detail. The DEIS was made available for public comment from January 4 to March 25, 2013. The FEIS was prepared after the end of the DEIS public comment period. It addresses the substantive public comments, makes corrections and provides additional information as a result of public comment. It identifies the Preferred Alternative and lists the mitigation measures that

General Response Name	General Comment	General Response
		would offset the environmental effects. A Notice of Availability was published in the Federal Register. The ROD will select an action alternative, a combination of the action alternatives, or the No Action Alternative. The ROD will also provide the rationale for the decision and identify mitigation measures.
Safety-1	Could the C-3 Alternative be as safe as the E-2 Alternative if frontage roads are added to the five-lane suburban section? –	The C-3 Alternative with frontage roads added along the five-lane suburban section was evaluated after the DEIS comment period. The additional frontage roads would create an excessively wide right-of-way footprint, would have high impacts to businesses, would increase environmental impacts and would have less safety benefit than the E-2 Alternative. If frontage roads are added to the C-3 Alternative, the five-lane section would be changed to a four-lane section with a two-lane frontage roads on each side of US-95 from the top of Clyde Hill to the grain elevators. Each frontage road would have two-12-ft. lanes with curb, gutter and sidewalk, with a minimum of two-ft. shoulders. The width of the C-3 Alternative would increase from 120 feet (for the five-lane section), to 250-300 ft (for the C-3 Alternative with frontage roads). The wider footprint would result in approximately $7.2 million additional cost for construction, which does not include the additional right-of-way or relocation costs. Adding the frontage roads would result in greater impacts to 11 businesses, six of which were not originally considered impacted by the C-3 Alternative. There would also be greater impacts to floodplains, prime farmland and more impervious surface compared to the original C-3 Alternative. Adding frontage roads to the C-3 Alternative would reduce the number of predicted crashes because the length of the five-lane suburban section with a two-way left turning lane would be reduced and the four-lane divided highway would be increased. The five-lane suburban section with a two-way left turning lane generates 3.4 crashes per centerline mile and the four-lane divided highway generates 1.1 crashes per mile. However, the C-3 Alternative would still have a higher crash rate than the E-2 Alternative because it would still have more county road intersections than the E-2 Alternative.
Safety-2	Why doesn't the Safety Analysis include crash factors to account for a greater number of predicted wild animal crashes on the E-2	The frequency of wild animal crashes is difficult to predict; however, the severity is observed to be very low compared to other crash types. Wild animal crash potential was expected to be greater on the E-2 Alternative based on opinions of wildlife experts because it would pass through 1.98 miles of low to moderate quality ungulate habitat; however, crash counter measures (improved typical sections, straightened alignments and accommodating wildlife crossing) may mitigate for this.

General Response Name	General Comment	General Response
	Alternative than W-4 and C-3 alternatives?	The Highway Safety Manual (HSM) Analysis Technique predicts some wild animal crashes within the base formula; therefore, the predicted crashes for each alternative generated using the Safety Analysis include wild animal predictions. The crash countermeasures are predicted to reduce the total number of wild animal crashes to a rate similar to the number of wild animal crashes predicted in the base rate of the HSM. Sight distance on E-2 is greater than Modified W-4 and C-3 due to its straighter roadway geometry and may offset the higher wild animal crash potential in that corridor. Roadside clearing is predicted to greatly reduce wild animal crash potential on all action alternatives, because brush and vegetation where wild animals can hide would be removed close to the highway. This would also improve driver reaction time. The roadside clearing technique was found to reduce wild animal crashes up to 90 percent as demonstrated on US-20 between MP 369 and MP 375 which had similar improvements (ITD 2013). Under-crossings at county roads and fencing will be used to direct wildlife to appropriate crossing locations and accommodate wildlife. Culverts at drainages will also be designed to accommodate movement of small terrestrial and aquatic species. If the E-2 Alternative is selected, ITD will monitor wild animal crashes to determine whether future mitigation is warranted. More detailed information regarding wild animal crashes was added to the FEIS Section 3.10 and 4.10 and the Revised Safety Analysis (ITD 2013). See FEIS Chapter 9, Environmental Commitments for additional mitigation measures.
Safety-3	If the safety of the remaining US-95 loop is considered, would the relative safety of the alternatives change? –	After the DEIS comment period, ITD revised the Safety Analysis to include the predicted crashes on the remaining US-95 loop which may be turned over to the NLHD. Only a fraction of the motorists that use US-95 today are predicted to use the remaining US-95 Loop if an action alternative is selected. The traffic on the rural section of the remaining US-95 loop is expected to decrease by 95 to 97 percent depending upon the alternative. The traffic in the suburban section south of Moscow is expected to reduce by 80 percent. This significant predicted reduction will result in much fewer crashes on the remaining US-95 Loop than existing conditions. The Revised Safety Analysis (ITD 2013) predicts that even considering the existing safety deficiencies on the remaining US-95 Loop, the relative safety benefits of the alternatives are consistent with the findings in the DEIS, although the total numbers of predicted crashes have changed for the alternatives. The E-2 Alternative would still result in the greatest safety benefit compared to the other alternatives. The E-2 Alternative would have 9 fewer predicted fatal and injury crashes than the C-3 Alternative and 16 fewer fatal and injury crashes than the Modified

General Response Name	General Comment	General Response
		W-4 Alternative in the 20-year design period. See General Response Safety-6 for a summary of the differences in the safety between alternatives. See FEIS Section 4.10 Transportation Effects and the Revised Safety Analysis (ITD 2013) for more detail.
Safety-4	Can improvements such as adding signage, flashing lights, rumble strips, medians or guardrails and speed limit reductions, be made to existing US-95 to address the safety deficiencies?	Safety improvements on existing US-95 that do not require realignment may offer modest improvements but would not provide a comprehensive, long-term solution, nor would it effectively address the project purpose and need because they would not effectively address the most serious roadway deficiencies related to access, horizontal and vertical grade and sight distance. Realigning the road along a flatter grade and creating a straighter road alignment would improve sight distance, curvature and grade. It would also reduce accidents due to maneuvering steep grades or sharp curves, which can be more dangerous on hazardous road conditions. Reduction in Speed Limit: Speed limits are based on guidance from the Manual on Uniform Traffic Control Devices (MUTCD), which is used by all 50 State Departments of Transportation (DOTs) and the ITD Traffic Manual. Adoption and use of the MUTCD is a regulatory requirement (23CFR 655.603) and it is incorporated into Idaho Administrative Code, IDAPA 39.03.41. The manuals follow fundamental concepts based on engineering studies to establish realistic and reasonable speed zones so that the majority of motorists observe it voluntarily. The MUTCD states that speed zones should be posted within five miles per hour (mph) of the 85th percentile speed (the speed at or below which 85 percent of the vehicles travel) of free-flowing traffic. The lowest crash rate occurs when vehicles are traveling one standard deviation above the mean speed, which is approximately equivalent to the 85th percentile speed or slightly above. If speed limits are arbitrarily posted low, people will disregard them, which results in vehicles traveling at varying or differential speeds, which would result in more crashes (ITD Traffic Manual Section 103.3). FHWA Report No. FHWA-RD-92-084 supports these basic engineering principals. The report was written to determine the effects of arbitrarily raising and lowering the posted speed limits on different highways on driver behavior. In 34 locations, the posted speed limit was within 5 miles per hour of the 85th percentile speed. When the speed limits were reduced by 5, 10, 15, or 20 miles per hour at these locations the mean difference in percentile speeds were less than one mile per hour. Lowering the speed limit does not mean that traffic will slow down. A speed study conducted on US-95 between Thorncreek Road and Moscow by the ITD from September 17 through September 20, 2012 confirmed that a 60-mile per hour speed limit is appropriate because the 85th percentile speed is 64 miles per hour.

General Response Name	General Comment	General Response
		Warning Signs and Flashing Warning Beacons: The MUTCD provides the standards that all 50 State DOT's use for guidance on signing and pavement marking. The MUTCD states, "The use of warning signs should be kept to a minimum as the unnecessary use of warning signs tends to breed disrespect for all signs." It also states that if warning signs are used in excess, they lose their effectiveness. The existing highway already has 28 warning signs relating to county road intersections, horizontal curvature, school bus stop locations, and merging lanes. In the judgment of the District 2 Traffic Engineer, additional warning signs would not reduce the crash rate. No flashing warning beacons are attached to the existing warning signs. Flashing warning beacons are typically used in a short term application for a night time work zone and the MUTCD does not recommend adding the flashing warning beacons to the permanent warning signs on rural highways. Rumble Strips: Adding rumble strips to the existing highway would add some safety benefit to the highway; however, the existing shoulder is very inconsistent and is too narrow to add the rumble strips. While they could offer a safety benefit, they would not be a comprehensive solution to address the other identified safety deficiencies. Median and Side Barriers (Guardrail): Median and side barriers, also known as guardrail, have varying levels of effectiveness; however, the existing highway is too narrow to add the barriers without reducing the lane or shoulder width. Adding the barriers without widening the existing highway would increase the crash rate and is not recommended. Widening the highway just to add the barriers would be costly and is not recommended because the Thorncreek to Moscow project is currently proposed. Adding barriers close to the travel lanes of the highway would decrease the severity of crashes, but would increase the frequency of crashes because of the additional crashes into the barrier. Adding two more lanes to the existing alignment would improve capacity and allow slower vehicles to pass; however, there could still be head-on crashes due to lack of median, the steep grades and sharp curves would not be repaired and the accidents that are caused by traffic entering and exiting the highway through the numerous accesses would continue to occur and would worsen as traffic volumes increase.
Safety-5	How will the action alternatives improve safety at Reisenauer Hill?	All three action alternatives would improve roadway safety over the existing conditions at Reisenauer Hill. The new roadway in this section would be a four-lane divided highway and designed to AASHTO Standards with greatly improved sight distance, clear zone distance, vertical alignment, horizontal alignment, and shoulder widths. The maximum grade of decent on

<table>
<tr><th>General Response Name</th><th>General Comment</th><th>General Response</th></tr>
<tr><td></td><td></td><td>Reisenauer Hill for any of the action alternatives would be 4.9 percent. The Modified W-4 and C-3 alternatives would descend Reisenauer Hill near the existing location at 4.9 to 4.8 percent grades respectively but at a reduced grade compared to existing conditions. The descent from Reisenauer Hill with the E-2 Alternative would be more gradual (4.4 percent) and located further north where weather conditions are better compared to the Modified W-4 and C-3 alternatives. See FEIS Section 4.10 and the Revised Safety Analysis (ITD 2013) for details regarding the improvement to Reisenauer Hill. All action alternatives would safe and would greatly improve the safety of US-95 between Thorncreek Road and Moscow compared to existing conditions since they would add additional lanes, a divided median and would be upgraded to meet AASHTO Standards.</td></tr>
<tr><td>Safety-6</td><td>Is there a significant difference in length, safety and travel time between alternatives?</td><td>The total lengths of the alternatives are shown in the table below.
Table 77. Alignment Lengths
<table>
<tr><th>Alternative</th><th>Five-lane Section (four-lane divided with center turn lane) (miles)</th><th>New Alignment Length (miles)</th><th>Travel Time (minutes: seconds)</th></tr>
<tr><td>No Action</td><td>N/A</td><td>6.34</td><td>6:49</td></tr>
<tr><td>Modified W-4</td><td>0.3</td><td>6.65</td><td>6:16</td></tr>
<tr><td>C-3</td><td>1.42</td><td>5.94</td><td>6:05</td></tr>
<tr><td>E-2</td><td>0.24</td><td>5.85</td><td>5:31</td></tr>
</table>
Source: Mobility and Road User Cost Study, (ITD 2014a)
–
The differences in total length between alternatives range from 0.09 miles and 0.84 miles. While the difference between the total length of the C-3 and E-2 alternatives is just 0.09 miles, over a 20-year period the travel times and travel user costs are substantial. The E-2 Alternative would save 800 hours of travel time compared to the C-3 Alternative. When monetary value is applied to the travel hours, the E-2 Alternative is estimated to cost $19 million less over a 20 year period compared to the C-3 Alternative. This is explained in the US-95 Thorncreek Road to Moscow; Mobility and Road User Cost Study on Alternatives Carried Forward (ITD 2014a), which is summarized in the FEIS Sections 3.10 and 4.10.
An important difference as it relates to safety is the lengths of the five-lane sections (four-lane section with a center turn lane) between alternatives. The five-lane section has approximately</td></tr>
</table>

<table>
<tr><th>General Response Name</th><th>General Comment</th><th>General Response</th></tr>
<tr><td></td><td></td><td>three times more predicted crashes than the divided four-lane rural section because the travel lanes are closer together and the turning movements from the center lane and approaches are predicted to generate more crashes. Other factors also contribute to the differences in safety including intersections and approaches. The E-2 Alternative would have the fewest country road intersections and the fewest residential and commercial approaches.

Table 78. Crashes 2017 through 2036
<table><tr><th>Alternative</th><th>Fatal and Injury Crashes</th><th>Total Crashes</th></tr><tr><td>No Action</td><td>256.5</td><td>642.5</td></tr><tr><td>Modified W-4</td><td>116.2</td><td>244.9</td></tr><tr><td>C-3</td><td>110.0</td><td>260.2</td></tr><tr><td>E-2</td><td>100.7</td><td>213.9</td></tr></table>
Table 79. Economic Costs of Crashes 2017 through 2036
<table><tr><th>Alternative</th><th>Cost (million dollars)</th></tr><tr><td>No Action</td><td>140</td></tr><tr><td>Modified W-4</td><td>35</td></tr><tr><td>C-3</td><td>33</td></tr><tr><td>E-2</td><td>29.5</td></tr></table>
The E-2 Alternative is predicted to have the fewest total crashes and fatal and injury crashes over the 20-year design period, which would be an important benefit to the victims and their families. These crash rates were determined on a per year basis with a 1.63 percent increase per year for all alternatives to account for an increase in traffic volume. Societal costs can be calculated for the predicted accidents using costs of crashes published by the FHWA for different crash types. More information on crash predictions and the economic costs of the predicted crashes can be found in the FEIS Section 4.10 and the Revised Safety Analysis (ITD 2013).</td></tr>
<tr><td>Safety-7</td><td>Is the data in the Safety Analyses (ITD 2012a), in the DEIS and FEIS valid?</td><td>The crash predictions are based on calculations from the First Edition of the American Association of State Highway and Transportation Officials (AASHTO) Highway Safety Manual (HSM). The HSM provides the most current and accepted knowledge and practices relating to safety management</td></tr>
</table>

General Response Name	General Comment	General Response
		according to AASHTO and Transportation Research Board Task Forces. The FHWA and all 50 State DOTs have reviewed and accepted the HSM methods for crash predictions. A better method of crash prediction does not exist. Nearly 2000 pages of calculations for the 20-year design period were used to make the safety predictions reported in the FEIS and the Revised Safety Analysis, Appendix E. More detail regarding the methods of calculations used by the HSM are on Pages 9 through 11 of the Safety Analysis (ITD 2013).
Schedule	What steps in the environmental process remain? When will the project be constructed?	The EIS process is a lengthy but thorough process. It requires that a range of reasonable alternatives be evaluated for their impacts to the human and natural environment before a decision is made. In making their decision, FHWA and ITD must balance the environmental impacts with the engineering/safety benefits to the public. The public and agency comments have been considered and are responded to in the FEIS. A Notice of Availability for the FEIS was published in the Federal Register. After 30 days, FHWA will issue a Record of Decision (ROD) selecting an Action Alternative, a combination of the Action Alternatives, or the No Action Alternative. After the ROD is issued, if an action alternative is selected, ITD can proceed with project design[20] and right-of-way acquisition. Design will require collecting detailed geotechnical data, survey data, determining specific right-of-way needs and producing detailed designs for the roadway. ITD will contact affected landowners regarding right-of-way acquisition, access and design details during the design process. Any improvement to properties prior to acquisition will be compensated for according to the Uniform Relocation Act. See the Uniform Relocation Summary in the FEIS Appendix 5. Construction will occur after the ROD is issued and after the right-of-way and design processes have been completed. The anticipated schedule is as follows: • Published 30 day Notice of Availability of FEIS in Federal Register-2015 • Issue ROD-2015 • Begin Preliminary Design-2015 • Begin Right-of-way Acquisition Process-2016 • Construction 2016-2017

[20] Should an action alternative be selected in the ROD, ITD will perform design concurrently with the 150-day statutory appeal period.

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		FHWA and ITD recognize that 6 fatalities and 152 injuries have occurred in 253 total crashes between 2003 and 2012 on this section of highway (ITD 2013) during this lengthy environmental process; however, we remain committed to implementing a comprehensive solution to the identified deficiencies. In doing so, we must comply with NEPA regulations. See General Response NEPA for a description of the NEPA process. See the FEIS Chapter, 8, Construction Phasing and Funding for additional details regarding construction and funding.
Water	How will the project impact the water table and wells?	A Hydrogeologic Analysis (Ralston 2014) was prepared to addresses possible ground-water impacts from construction of the alternatives. Information from the report has been prepared and is incorporated into the FEIS, primarily in Section 4.7. This analysis concluded that there is very low to no potential to impact groundwater or wells from any of the alignments. Granite underlies most of the length of the proposed alternative routes of Highway 95 south of Moscow. The Modified W-4 has the greatest length of roadway that overlies basalt. All three alternatives overlie basalt at the northern end of the project. Most of the existing wells in the area are completed to obtain water from local ground-water flow systems in granitic or metamorphic rock. Most of these wells exceed 100 feet in depth and obtain water from a producing zone at the bottom of the well. Wells that are completed in basalt are located mostly at the north end of the project. These wells obtain water from the Wanapum Formation, which hosts the upper aquifer in the Moscow area. The potential for highway construction along any of the three alignments to impact ground-water flow systems in either recharge and discharge areas is very low. Highway construction has the potential to increase recharge to shallow ground water because of runoff from paved areas and snow drifts created by plowing. The amount of this increase will be very small. Impacts on topographically low ground-water discharge areas should be minimal because these portions of the roadway will be constructed on fill or using bridges. The potential for impacts on domestic wells is extremely small except for those wells, which will be destroyed because they are located within the selected road alignment. Relocation of utilities will be specified during final design. Best Management Practices (BMPs) will be implemented during construction to minimize impacts to water resources including groundwater and wells. ITD will coordinate with residents and businesses and notify them in advance of utility relocation activities. See the FEIS Section 4.7 and the Hydrogeologic Analysis Technical Report for supplemental information regarding impacts to groundwater.

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Weather-1	Was there sufficient data and evaluation of the C-3 Alternative in the Weather Analysis?	The weather analysis was revised after the DEIS hearing in order to help clarify the information and to provide additional data. In the weather analysis (Qualls 2014), three climatic regions were identified which corresponded to air flow over and around Paradise Ridge and elevation and were named and mapped as Lowland, Flow-Over Ridge (LFO), Highland, Flow-Over Ridge (HFO) and Highland, Flow-Around Ridge (HFA). One climate station was placed in each of these regions and referred to in the Revised Weather Analysis. The LFO is the Western Corridor (WC) and best encompasses the W Alternatives, the HFO is the Eastern Corridor (EC) and best represents the E Alternatives and the HFO is the Reisenauer Hill area (RH) and represents the southern section of all of the alternatives. While there is no specific climate station for the C Alternatives, A Central Corridor (CC) is referenced in the report, which runs in a north-south direction generally encompassing the existing US-95 and the C Alternatives. Weather and climate within the Central Corridor is determined either by interpolation between the Western and Eastern corridor measurement sites or by spatially and temporally distributed satellite observations. Except in some cases with spatial data from satellites and historical accident records on the existing US-95, no attempt is made in this report to specify weather or climate conditions exactly on a particular existing or potential roadway alignment but rather the conditions within the general corridors are discussed. See the FEIS Sections 3.10 and 4.10 and the Revised Weather Analysis (Qualls 2014) for clarifications and additional information.
Weather-2	Why did the DEIS Weather Analysis only include five months of data during a dry and mild weather year? The study should include more months and additional years of data.	The five-month data set was not the sole source of weather data but is a valid methodology used to establish the relative conditions among the EC, WC and RH weather stations within their respective climate regimes. This smaller five-month data set was used to rank the larger 30+-year data set available at the UI Plant Sciences Center, which is about a mile from the study area. Knowledge of the relative conditions among the three on-site weather stations and the UI weather station allowed estimation of the long-term climate at each of the on-site weather stations through calibration with the long-term UI climate records. This is an accepted method for correlating the data and the weather information since the relative weather conditions at the three stations behaved in accordance with established principles of physics and thermodynamics, and comparisons with similar locations and/or elevation trends published in scientific literature (Qualls 2014). It Is common practice in scientific field studies to conduct short-term data collection, on the order of a few months, to determine spatial variability of weather characteristics (for example, the First International Satellite Land

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		Surface Climatology Project (ISLSCP) Field Experiment (FIFE), (Hall and Sellers 1995) from which more than 1000 scientific publications were produced. A Revised Weather Analysis (Qualls 2014) has been prepared which provides more detail about additional weather elements, additional weather data collected after the 2005 weather study, including year-around coverage, which generally includes winter weather conditions. Additionally, satellite remote sensing data from 2002 through 2012, document the spatial distribution of snow ranging from mild to harsh winters. Additional information regarding the methodology and findings has also been added to the FEIS Section 3.10 and 4.10.
Weather-3	How does elevation affect the temperature and ice formation temperature? Would there be differences in safety between alternatives due to the higher elevation and weather conditions such as frost and ice?	Weather stations were placed at different elevations within the study area to capture the elevation effects. There is an approximately 400-foot difference in elevation between the WC and EC weather stations. Satellite remote sensing was also used to observe the spatial distribution of snow accumulation and melting across the study area and at different elevations. The WC weather station, which is lower in elevation, was often colder than the higher EC weather station, by 15 to 20 °F. This is due to cold air drainage, when cold air, which is denser, flows downhill and pools in low elevation areas. When WC was colder than EC, the average temperature difference is 5.4 °F and WC was colder than EC by 12 °F about 5 percent of the time. This creates greater potential for frost formation, freezing roads, and black ice on low areas of the Modified W-4 and C-3 alternatives compared to most of the length of the E-2 Alternative. Temperatures were below freezing at the low elevation WC weather station when the higher elevation EC weather station was above freezing approximately three times longer than when the EC station was below freezing and the WC station was above freezing. The observations agreed well with principles of physics and thermodynamics, as well as published scientific studies (Qualls 2014). Air temperature may decrease with increasing elevation under well-mixed atmospheric conditions (e.g., windy weather or a sunny day with strong solar heating of the ground). Across the 400 feet of elevation difference between WC and EC, this averaged about 1.8 °F if only the data when WC was warmer than EC are included, due to atmospheric thermodynamics. This difference exceeds 2.9 °F less than 5 percent of the time. Under these well-mixed circumstances, the E-2 Alternative at its highest point could average 1.8 °F cooler than the lowest point of the Modified W-4 Alternative alignment. Combining all the data when either WC or EC is colder than the other, yields an overall average

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		temperature difference of about 1 °F with WC being colder on average, because of the significantly colder temperatures which occur at WC due to cold air drainage compared to the mildly colder temperatures at EC associated with well-mixed atmospheric conditions. All of the action alternatives have a similar peak height in elevation on Reisenauer Hill at around 2875 ft. However, the E-2 Alternative would be on level grade through this area and would descend in elevation further north where weather conditions are improved. The C-3 and Modified W-4 Alternatives would descend in elevation near Reisenauer Hill at a slightly steeper grade. The spatial distribution of weather-related accidents on the existing US-95 from Thorncreek Road to Moscow is predominantly associated with the spatial distribution of road characteristics such as tight radii curves located down slope on hills, and ingress/egress associated with road junctions and driveways, rather than due to spatial distribution of weather. Since all proposed alignments are designed to current AASHTO standards, all will result in a great improvement over existing conditions and will be safe. Because the road characteristics, rather than the spatial distribution of weather dominate the distribution of accidents, the prescribed Safety Analysis (ITD 2013) for each of the proposed alternatives, reflects the relative safety between alternatives. The distinction between alternatives considered road alignment characteristics such as length, slopes, and curvature, which are already considered in the Safety Analysis (ITD 2015b). Weather was discussed in the DEIS 3.10 and 4.10. A Revised Weather Analysis (Qualls 2014) was completed and additional information has been added to the respective sections in the FEIS.
Weather-4	How would precipitation and snow accumulation differ between alternatives?	Regionally, precipitation decreases on a gradient from Moscow south to the top of the Lewiston grade. Countering this is the localized topography of Paradise Ridge and the fact that precipitation generally increases with elevation on the upwind side of a slope. Both the on-site weather station measurements and the satellite images provide useful information pertaining to snow accumulation between alternatives. Reisenauer Hill is the most critical location within the study area, including both the north-facing slope on the north end and the region to the south toward Thorncreek Road, due to greater accumulation and retention of snow compared to the rest of the study area. Annual precipitation at the EC and RH weather stations are similar to the UI long-term climate station, and are an average of 2.5 inches per year lower at the WC weather station. Due to the short horizontal distance in the upwind direction from the peak of Paradise Ridge to the valley floor, much of the precipitation lands and accumulates downwind of the ridgeline to the south

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		and east of Reisenauer Hill and Paradise Ridge. There would be approximately 5 to 7 inches more snowfall per year at EC and RH compared to WC, or a melted snow liquid depth (also called Snow Water Equivalent (SWE) difference of 0.5 to 0.7 inches. On-site measurements and satellite remote sensing, summarized below, show greater persistence of snow around Reisenauer Hill than along the central and northern portion of the E-2 Alternative's alignment. Landsat satellite images of the study area and the surrounding region provide an excellent picture of the spatial distribution of snow. Examples of these images spanning 2002 through 2012 are provided in the FEIS Sections 3.10 and 4.10 and in the Revised Weather Analysis (Qualls 2014). The key satellite findings are: When there is six to eight inches depth or more at the UI Plant Sciences Farm (PSF), either accrued as a single, large snowfall event, accrued in small increments over multiple days, or while melting down to 6-8 inches from greater depths at PSF, the satellite images show continuous spatial coverage of the study area and surrounding region by snow. When the snow depth at PSF drops below about six inches during melting, the central portion (E-2 and C-3 Alignments) will have patchy conditions. The emergence of these patches is strongly controlled by hill slope orientation. South-facing slopes, which have much greater exposure to the sun, melts off faster than north-facing slopes. The patch quickly spreads westward, and then begins to melt off north-facing slopes in the central area defined above and including west of US 95. Snow persists substantially longer south and east of the ridgeline of Paradise Ridge, including the ridgeline as it passes Reisenauer Hill, which during the winter months is usually the downwind side of the ridgeline. Snow also persists down the north-facing slope of Reisenauer Hill, particularly from the existing US-95 toward the west. Additionally, snow persists on the north end of the study area on north-facing slopes north of Clyde Hill and the east-west power lines of the eastern alignment, though it does not persist there for as long as on either the north face or the south side of Reisenauer Hill. Regional coverage snowfall of a few inches can provide relatively complete coverage of the study area, and it begins to melt off following the pattern described in 2 and 3 above. All of the action alternatives would be upgraded to meet AASHTO standards and safety would be greatly improved compared to the No Action Alternative. Therefore considering only spatial distribution of weather, especially snow, Modified W-4 and C-3 will be exposed to greater snow

General Response Name	General Comment	General Response
		accumulation during descent of Reisenauer Hill compared to the E-2 Alternative which is flatter near Reisenauer Hill but descends in elevation further north in the study area with less snow accumulation. Since all proposed alignments are designed to current AASHTO standards, all will result in a great improvement over existing conditions and will be safe. Because the road characteristics, rather than the spatial distribution of weather dominate the distribution of accidents, the prescribed Safety Analysis (ITD 2013) for each of the proposed alternatives, reflects the relative safety between alternatives. The distinction between alternatives considered road alignment characteristics such as length, slopes, and curvature, which are already considered in the Safety Analysis (ITD 2015b). See the FEIS Sections 3.10 and 4.10 and the Revised Weather Analysis (Qualls 2014) for additional information.
Weather-5	How will fog vary between alternatives?	Fog or clouds are formed when the temperature of the air decreases enough that atmospheric water vapor reaches the saturation point, causing condensation of vapor into fine liquid water droplets. This can happen because temperature decreases or by increasing atmospheric humidity. Measurements of visibility distances associated with fog at EC, WC, and RH showed RH (Southern Highland Flow) to have the poorest visibility conditions, followed by EC and then WC. Since all roadway alternatives pass RH, all alternatives will be subject to the poorest visibility conditions of the area. However, with the improved typical section the safety of the action alternatives would be greatly improved over the No Action Alternative. The relative safety between alternatives is therefore reflected in the results of the Revised Safety Analysis (ITD 2013). See FEIS Section 3.10 and 4.10 and the Revised Weather Analysis (Qualls 2014) for additional information.
Weather-6	How will wind vary between alternatives? How will blowing snow and snowdrifts vary between alternatives?	As stated in the DEIS, wind speeds were similar between all corridors. Wind was measured at all three stations, whose locations are shown on the Study Area Map of the Climate Report (Qualls 2014), and on the ITD alignment maps. These included one station in each of the three climate regimes, Highland Flow Around (HFA- (RH)), Highland Flow Over (HFO- (EC)), and Lowland Flow Over (LFO- (WC)), as defined in the Climate Report. Measurements at EC showed winds were modestly lower than at WC for high wind speeds. The fastest individual gusts and highest average wind speeds were at RH. The fastest individual gusts and highest average wind speeds were at Reisenauer Hill. Gust speeds of 30 mph or greater correspond to sustained wind speeds of 25 mph or greater. This would be typical of wind speeds warranting a Wind Advisory from the National Weather Service. Gusts generally come from a

General Response Name	General Comment	General Response
		westerly direction except Reisenauer Hill, which have some gusts up to 38 mph from the east. However, all the alternatives must pass through the Reisenauer Hill area (Qualls 2014). Consequently, the direct effect of wind on vehicles in general, and on large trucks in particular, should be no worse for any of the proposed alternatives than what is currently experienced on the existing US-95. As stated in General Response Weather-1, while there is no specific climate station for the C Alternatives, The Central Corridor referenced in the report, runs in a north-south direction generally encompasses the existing US-95 and the C Alternatives. Weather and climate within the Central Corridor is determined either by interpolation between the WC and EC measurement sites or by spatially and temporally distributed satellite observations. Each of the proposed alternatives will be designed to have an elevated roadbed on fill material, which will produce localized acceleration of wind across the road surface (Qualls 2014), which will help prevent accumulation of drifted snow on the road surface. There may be specific features in this area which locally reduce the wind such as trees along the roadway, or deep road cuts which can have localized effects on road ice and snow accumulation, and sudden exposure to wind gusts during transitions from road fill to cut sections. With the improved typical section the safety of the action alternatives would be greatly improved over the No Action Alternative. The relative safety between alternatives is therefore reflected in the results of the Revised Safety Analysis (ITD 2013). Additional information regarding weather is provided in the FEIS Section 4.10 and in the Revised Weather Analysis (Qualls 2014).
Weather-7	How were the microclimates in the study area evaluated and considered?	The local microclimates have been captured through weather station measurements, evaluation of the satellite remote sensing images, consideration of principles of physics and thermodynamics, and published scientific studies. The weather study included measurements from a weather station installed west of Paradise Ridge on the bench traversed by the E-2 Alternative in the EC. There were also weather stations that collected data for the RH and WC (Modified W-4 Alternative). Multiple measurements were collected each minute, and these were reported as samples, averages or accumulations, depending on the variable, several times per hour. Satellite remote sensing images also provided information about the spatial distribution of snow across the study area under a wide range of winter weather conditions. These provide a detailed high spatial resolution, and consistent description of the microclimates of the study area. These measurements were compared with measurements from other weather stations in the study area to determine the relative severity of various weather elements in different parts of the study

General Response Name	General Comment	General Response
		area. Additional detail is provided in the FEIS Sections 3.10 and 4.10 and the Revised Weather Analysis (Qualls 2014).
Weather-8	Would the limited data set and the difference in weather conditions between alternatives change the findings in the Safety Analysis?	The findings in the Safety Analyses as they pertain to weather remain valid for the following reasons: • Spatial variability of weather exists across the study area. • Weather-related accidents are predominantly associated with frozen surface conditions (i.e., snow/ice/slush). • Most often when frozen surface conditions exist, they occur across the entire study area. • Very few accidents are associated with wind and fog. • The spatial distribution of weather-related accidents on the existing US-95 from Thorncreek Road to Moscow is predominantly associated with the spatial distribution of road characteristics such as tight radii curves located downslope on hills, and ingress/egress associated with road junctions and driveways, rather than due to spatial distribution of weather. • All proposed new alignments (i.e., Modified W-4, C-3 and E-2) are designed in accordance with current AASHTO (American Association of State Highway Transportation Officials) standards, which are much safer than the existing US-95. • Because road characteristics, rather than the spatial distribution of weather, dominate the distribution of accidents, the prescribed AASHTO safety analysis of each of the proposed alternatives (Arnzen, pers. comm 2012) should be taken at face value for the comparison of the accident safety of the proposed alternatives. Additional information is provided in the FEIS Sections 3.10 and 4.10 and in the Revised Weather Analysis (Qualls 2014).
Weeds	Will the E-2 Alternative destroy Palouse remnants, rare plants, and endangered plants and native vegetation? –	As stated in the DEIS, Palouse remnants, rare plants and populations of native vegetation occur within the project study area. These are described, mapped and assessed in Biological Evaluation of Plant Species and Communities of Conservation Concern in the US Highway 95 Thorncreek Road to Moscow Project Area (Lichthardt 2005), which was distributed with the DEIS. The study identified different vegetative communities, located rare plants and generally assessed condition based on size and exotic species infestations. Paradise Ridge contains the largest remaining Palouse remnant in the study area. The E-2 Alternative would not go over the top of the ridge, but would parallel the grasslands on

General Response Name	General Comment	General Response
		Paradise Ridge, about 0.7 mi from the summit and about 0.25 mi from the large Palouse remnant associated with the ridge summit. The E-2 Alternative would not directly impact any rare plants, threatened or endangered species or Palouse prairie remnants. The E-2 Alternative could result in indirect effects such as increased spread of weeds, establishment of new weeds as a result of the closer alignment as stated in the DEIS and FEIS Chapter 6, Indirect and Cumulative Effects. Weeds populations could affect potential habitat for rare and native plant species affecting their future success. Additional information regarding weed species, weed dispersal and potential effects has been incorporated into the FEIS Sections 3.8 and 4.8. This information was from the DEIS Technical Report titled A Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between Uniontown Cutoff and Moscow (Lass & Prather 2007). Spalding's Catchfly is the only federally listed plant known to occur in the project area. The USFWS determined that all of the alternatives may affect but are not likely to adversely affect Spalding's Catchfly, a federally listed plant, based on potential indirect effects as stated in the DEIS and FEIS Section 4.9. An additional survey for Spalding's catchfly was conducted in the project area in the summer of 2013 and no new populations were identified. The alternatives could increase weed dispersal to private lands that have been identified as high priority areas for Palouse prairie restoration and for Spalding's Catchfly establishment. As stated in the DEIS Section 4.8 the E-2 Alternative crosses a property which is enrolled in a USFWS restoration program, however, the alignment would not go through any portion of the property for which restoration activities are ongoing or planned. The Paradise Ridge remnant is ranked as a high-quality remnant, but is not a pristine, weed-free, or a publicly accessible resource, although several landowners allow some public use. Paradise Ridge consists of privately owned parcels with approximately 55 existing residential and commercial developments which are continuing to increase and develop on and around the Ridge. Additional information about rare plants, Palouse remnants, and restoration sites has been added to the FEIS Sections 3.8 and 4.8. Additional information regarding the indirect and cumulative effects of the alternatives to Palouse remnants and rare plants in combination with past, present and reasonably foreseeable future impacts, including residential and commercial development, has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. The indirect effects from the alternatives will be mitigated through a number of different commitments: implementing ITD's Vegetation Management Plan in conjunction with USFWS,

General Response Name	General Comment	General Response
		IDFG, NRCS and landowners within the project area; providing funds to landowners for weed control in prairie restoration sites, constructing farmable slopes to minimize weed establishment and spread, and revegetating slopes and fills with native grasses and forbs to minimize weed establishment and spread along the roadway. Species will be determined in consultation with USFWS and NRCS to help ensure compatibility and successful establishment. The action alternatives would have Expressway Access Control, which would help minimize future development along the roadway and associated indirect effects. See General Response Access. Additional information regarding indirect and cumulative effects to Palouse remnants and Paradise Ridge has been added to FEIS Chapter 6, Indirect and Cumulative Effects. The full list of mitigation measures is provided in the FEIS Chapter 9, Environmental Commitments.
Wildlife	How will the alternatives impact flora, fauna and wildlife habitat on Paradise Ridge? –	ITD recognizes that Paradise Ridge has ecological, visual, and recreational value to the community; however, Paradise Ridge, except for the Palouse remnant defined by the ICDC and shown in the DEIS Figure 24, does not appear to have a specific boundary. For the purposes of this EIS, Paradise Ridge is shown in Figure 20 and based on the topography of the area (3100ft and above). None of the alternatives, including the E-2 Alternative, would go over Paradise Ridge or directly impact it. The E-2 Alternative would be located along the base of Paradise Ridge. As discussed in the DEIS, the E-2 Alternative would primarily directly affect farmland, Conservation Reserve Program (CRP) land, and would remove 3.9 acres with cultivated pine trees near Eid Road. CRP land is commonly marginal farmland that has been taken out of production and enrolled in the program voluntarily. It is not subject to special protections or preservation outside of that program. The landowner can determine to put land into or take it out of the CRP program; there is no assurance of its long-term preservation. The wildlife reports all concluded that the project area does not contain any high quality or critical big game habitat. The E-2 Alternative would affect more land that is considered moderate or marginal quality ungulate habitat compared to other alternatives as summarized in DEIS and FEIS Sections 3.8 and 4.8. The impacted pine stand near Eid Road offers habitat for pygmy nuthatch; however there is similar available habitat located on Paradise Ridge and elsewhere in the region. See Section 4.8.1 Vegetation and Habitat Effects under Pine Stand Effects. As stated in the DEIS Section 3.8 and 4.8, the pine stand also offers habitat for many other species including northern alligator lizard and long-eared myotis. Additional information has been added throughout the FEIS regarding the diversity of species on Paradise Ridge, the ecological function of CRP land, updated occurrence data and information about effects to the giant Palouse earthworm, traffic noise effects on birds,

General Response Name	General Comment	General Response
		bumblebees, matrix habitat, and habitat fragmentation. While Paradise Ridge contains an important Palouse remnant and provides wildlife habitat, it is not a pristine, weed-free, or a publicly accessible resource. Paradise Ridge is entirely privately owned residential and commercial parcels zoned for rural residential development. There are currently approximately 55 existing residential and commercial developments on and around the ridge. The houses, buildings, fences, septic, utility lines, driveways, roads, agriculture, pets and other human activities already have an effect on wildlife, habitat, visual effects and the setting of the ridge. These human activities could transport and introduce weeds, fragment habitat, and introduce light and noise affecting the setting of the ridge. As described in the DEIS and FEIS 3.8, there are also active restoration projects for reestablishment of Spalding's catchfly, native vegetation and ecological weed control on private lands. The E-2 Alternative would cross one property that is enrolled in a restoration project but the impacted portion of land is not planned for any restoration activities. Latah County through its land use planning and zoning has the ability to provide protective measures to prevent further development of this area. ITD does not have the ability to regulate private development but may control access from the highway. Highways often have the potential to increase development pressures along their corridor; however, enforcing Expressway Access Control, which is described in General Response Access, will help mitigate this development pressure. The direct and indirect effects of current and ongoing growth on Paradise Ridge, has been considered in addition to the highway's indirect effects. Additional information regarding the indirect and cumulative effects of the alternatives to Paradise Ridge has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. While there are no strongly defined migratory corridors through the project area animals do traverse the project area. If an Action Alternative is selected, there are many mitigation measures, BMPs and standard practices that would be implemented to minimize harm and mitigate for impacts to vegetation, wildlife and habitat. Culverts in drainages will be designed to allow small terrestrial species to move through. Under-crossings at county road intersections will be designed to accommodate animal movement. If the E-2 Alternative is selected, ungulates would be able to cross at Eid Road. Under-crossings will require fencing and other design elements to help ensure success. See General Response Weeds for additional information on weeds and vegetation. See Chapter 9, Environmental Commitments for the list of wildlife mitigation measures.

10.3 Agency Comment Responses

This section provides the scanned comment letters from the City of Moscow, USFWS, EPA, IDFG, and the City of Lewiston. The agency letters with ITD and FHWA responses are presented in this section.

City of Moscow
Community Development

Memo

To: Planning and Zoning Commission

From: Bill Belknap, Community Development Director

Date: January 18, 2013

Re: U.S. 95 DEIS Comments

On December 14, 2012, the Idaho Transportation Department (ITD) and Federal Highways Administration (FHWA) published the Draft Environmental Impact Statement (DEIS) and Section 4(f) evaluation for the US-95 Thorncreek Road to Moscow project which is anticipated to include the reconstruction and realignment of approximately six (6) miles of US 95 immediately south of Moscow. ITF reports that this particular section of US 95 has the highest accident rate within District 2, and ranks within the top 13 highest accident locations within the entire State of Idaho.

On January 15th, City Supervisor Gary Riedner requested that several City Commissions review the DEIS to determine if the Commissions desired to provide the City Council with any recommendations regarding comments that the City may wish to provide to ITD and FHWA during the public comment period which is open until February 23rd. As the Planning and Zoning Commission is tasked with current and long-range land use and transportation planning efforts, these areas appear to be relevant to the Commission's charge and appropriate for the Commission's consideration. The DEIS document has been mailed to Moscow residents on CD and is available for review on the web at: www.us95thorncreek.com

Staff has conducted a preliminary review of the DEIS and has identified comments that the Commission may wish to consider (referenced below by page and section), along with any other comments that the Commission may desire to provide. Staff's primary interest in the review process focused upon the potential impacts upon; current and future land uses in the area; planned future transportation facilities; planned recreation and pathway facilities; and the accuracy of statements within the document pertaining to City-related planning efforts and projects. Staff's initial comments are detailed below for the Commission's review.

General Comments:

1. Staff would strongly encourage ITD to consider the potential future intersection design for the Ring Road and/or alternate U.S. 95 and State Highway 8 alignments within the design of this project. This consideration could include the evaluation of a crossing structure that would provide grade separation for the future Ring Road, local access to property located east of the E-2 Alignment, and a grade separated pedestrian/pathway

crossing of U.S. 95 to reduce future pedestrian and local traffic conflicts with the highway. The topography would appear to possibly support a separation structure as the roadway descends off of the ridge located just east of the existing U.S. 95 alignment. Consideration of this now could help reduce disruption and additional cost in the future and protect and preserve the function of the highway system.

2. Regardless of what alignment is selected, it is recommended that access to the new highway section be restricted to reduce turning movement conflicts, safety hazards and potentially undesirable land use and development patterns. The 1.42 mile long five lane section as proposed within C2 is much more likely spur strip commercial development along the highway corridor immediately south of the City into the future. This type of development pattern would generally be undesirable and would likely increase congestion and safety hazards on the road facility and could result in additional traffic control signals and travel delays in the future.

3. The City Council has recently identified the beautification of the City entryways as a Council Goal. It appears that there would be an opportunity for the City to work with ITD to identify beautification opportunities such as enhanced landscaping, hardscape treatments, and public art elements that could be incorporated within, or installed in conjunction with, the project to improve aesthetics of the City's southern entrance for the traveling public and visitors to Moscow.

4. Staff recommends that ITD incorporate pedestrian and bicycle facilities in the roadway design within the urbanized areas. Where feasible, these facilities should include tree lawns/green strips to provide pedestrian separation and reduce snow removal/sidewalk conflicts.

5. Staff would encourage ITD to work with City staff to identify current and planned future local street intersection access points and incorporate those within the project design as appropriate.

6. The City would encourage ITD to work with existing business owners through the design and construction process to ensure that suitable access is maintained during and after construction.

Specific Comments:

1. Pg. 64, Table 15. There appears to be an error with respect to Gritman Medical employment numbers, I believe it should be closer to 350 FTE positions.

2. Pg. 69, City of Moscow Comprehensive Plan. This section states that the "land outside the city limits is zoned by Latah County as suburban residential." The vast majority of the land area outside the city limits is zoned Agriculture/Forestry, along with smaller areas of Motor Business, Industrial and Commercial along U.S. 95.

3. Pg. 70, Bulleted List, First Bullet. The document makes reference to the Ring Road concept and the fact that it is a proposed loop around the city, and then states that it is generally west of U.S. 95. In fact the Ring Road Concept includes concept alignments in all four quadrants of the City (on both the east and west sides of U.S. 95) and the southeast quadrant has been considered as a possible alternate alignment of State Highway 8. The section continues to discuss the relative benefits of an east or west alignment which leads to confusion of the reader. I believe the discussion in this section is confusing the Ring Road concept with a U.S. 95 bypass. While certain sections of the Ring Road could be considered as alternate alignments of U.S. 95 and State Highway 8, the principal focus of the concept was to facilitate circulation in and around Moscow to reduce congestion from regional through traffic in the City's downtown core.

4. Pg. 71, Other Plans. The document incorrectly states that the City of Moscow is preparing a Moscow School District Long-Range Facilities Plan. That effort is being conducted by the Moscow School District.

5. Pg. 71, Recreation. The document should reflect the City's planned linear park/pathway along the Southfork of the Palouse River as reflected within the City's Comprehensive Plan and potential grade separation crossing facilities that could be considered as part of the Thorncreek project to alleviate this potential future crossing conflict.

6. Pg. 115, Access and Mobility. The first paragraph describes U.S. 95 as a principal arterial and State Highway 8 as a "major east west highway." I believe both U.S. 95 and State Highway 8 serve an important role as principal arterials within the local system, as well as significant U.S. or State Highways in the regional transportation system.

7. Pg. 115, Mass Transit. The report states that there is no mass transit available in the study area. It may be good to mention that there is mass transit operating within Moscow, and that while service may currently end approximately 0.5 miles north of the northern project boundary, consideration of future service extension within the project area is possible.

8. Pg. 122, Table 35. The organization of the Clyde Road to Palouse River Road section appears to be inconsistent with the above sections and unclear as to what the numbers represent.

9. Pg. 142, W-4. The report states that the W-4 alignment would be "inconsistent with the City of Moscow's goals for constructing the planned Ring Road project." It then states that a "western alternate route would respond to the higher development trends west of Moscow and would be closer to the universities of Moscow and Pullman." I am unaware of why the report would conclude that the W-4 alignment is inconsistent with the Ring Road and the second sentence would appear to conflict with the first. The report continues on to state that the W-4 alignment "would bisect the proposed ball fields and could spur development in that area, diverting resources that would be in

conflict with the City of Moscow's plans for the ball field, school, and residential development." W-4 is located over a quarter mile south of the City's ball field property and does not bisect it. Additionally, there are no current plans for the construction of a school in that location (however, if residential development were to occur in the area it is possible that could occur, but there are no plans for such a school at this time).

10. Pg. 143, C-3. The report states that C-3 would present challenges for connectivity to the planned Ring Road project. I do not know exactly what consideration lead to this conclusion, but it would appear that the C-3 alignment might present the least challenge to this connection as the intersection with the Ring Road would occur in a location without significant horizontal or vertical curvature of U.S. 95, which may not be the case with W-4 or E-2 depending upon final design.

11. Pg. 143, E-2. The report states that "E-2 could also increase property values and have growth along its alignment; however it would be less growth than W-4 and would have controlled access." Increased strip development along the E-2 corridor, especially if it included an extended 5 lane (4 travel and center turn) facility south of Moscow, would generally not be desirable. Increased access points, traffic signals and overall congestion in an area of fairly significant grade in the transition from Paradise Ridge to the Moscow could impede the safe function and operation of the highway system. It would be preferred to have the median-separated facility begin as soon as feasible south of Moscow to limit local access and preserve the operation and safety of the highway.

12. Pg. 159, Avoidance, Minimization and Mitigation. The City has identified areas of desired riparian restoration and constructed floodplain improvements within the SE Industrial Park Project which may be suitable wetland mitigation receiving sites. The City would assist and facilitate consideration and possible mitigation construction with the respective property owners if this is a feasible option.

Date

Mr. Bill Belknap
City of Moscow
P.O. Box 9203
Moscow, ID 83843

RE: US-95 Throncreek Road to Moscow E-46 DEIS comments

Dear Mr. Belknap:

The Idaho Transportation Department (ITD) received your e-mail regarding the referenced project and is providing the following as a follow-up to your concerns. The headers and numbers correspond to the comments in your letter.

General Comments:

1. Based on discussions with City staff during the Community Impact Assessment update (2011), a final detailed Ring Road alignment had not been identified and funding had not been allocated or secured to finance the project. In addition, the Ring Road concept would be an independent project that has a separate purpose and need from this project. Additional evaluation, a clear future funding source, and regional plan acceptance and adoption would be required to initiate additional infrastructure as part of this project. However, ITD will work closely with the City to ensure that the design of the US-95 project is consistent with and does not preclude construction of the Ring Road concept. The Final Environmental Impact Study (FEIS) Sections 3.2 and 4.2 have been modified to clarify the status and possible alignment of the proposed Ring Road concept.
2. All the action alternatives would have Expressway Access Control which would restrict new development. The E-2 Alternative would have a shorter five-lane section than the C-3 Alternative which would result in fewer new accesses, less development pressure and congestion and would improve safety at the south end of Moscow. See FEIS Chapter 4.10.2 for additional clarification of access control for the action alternatives.
3. ITD staff is currently on the City of Moscow Entryway Beautification Steering Committee. ITD will continue to coordinate as appropriate during final design to identify beautification and design elements; however, these may need to be maintained by the City of Moscow.
4. Bicycle and pedestrian facilities for the project are outlined in the Draft Environmental Impact Study (DEIS) Section 4.10.3. All Action Alternatives include a four-lane highway with center turn lane, gutter and sidewalk sections that meet American Disabilities Act (ADA) requirements. All Action Alternatives would improve safety and access for bicyclists and pedestrians. Final project design and maintenance would be coordinated with the City of Moscow as appropriate. Landscaping would be coordinated with the City of Moscow through ITD Staff participation on the City of Moscow Entryway Beautification Steering Committee.
5. ITD will work with City of Moscow staff during final project design as appropriate.
6. Coordination with business owners regarding access would occur during final design.

Continued…

Specific Comments:

1. Employment data was provided by the Idaho Department of Labor for 2011 and includes full and part time employees. This clarification and the reference will be cited within the DEIS Section 3.1, Socio-economic and Environmental Justice.
2. This sentence was revised in the FEIS Section 3.2, Land Use and Recreation.
3. The information regarding the Ring Road concept has been clarified in the FEIS Section 3.2 and throughout the FEIS where it is discussed.
4. This referenced sentence has been updated in the FEIS Section 3.2, Land Use and Recreation.
5. The City of Moscow Parks and Recreation Department was interviewed as part of the Community Impact Assessment update (2011). During this interview, the linear park was not discussed. Information on this planned park has been added to the FEIS Section 3.2, Land Use and Recreation. The proposed grade separated crossing for the planned pathway is independent from this project but ITD will coordinate with the City of Moscow during final design as appropriate.
6. Clarification regarding this has been made in the FEIS Section 3.10 Transportation.
7. Information concerning this has been added to the FEIS Section 3.10 Transportation under Mass Transit.
8. Table 35 on page 122 represents traffic volume inputs for roadway segments, which are used as assumptions for the TNM noise model that predicts noise volumes. Additional clarification has been provided in the FEIS Section 3.12.2, Methodology.
9. The statement was clarified in the FEIS Section 4.2 to reflect that the W-4 alignment could present challenges for connectivity to a future Ring Road concept, and that it could bisect an area cited for potential future residential growth southwest of the City.
10. The statement has been clarified in FEIS Section 4.2 and throughout the FEIS where this statement is made.
11. Access onto US-95 would be limited to reduce crashes for any of the action alternatives; however, the E-2 Alternative, which is ITD's Preferred Alternative is anticipated to have the shortest 5 lane section and the fewest accesses of any of the action alternatives. See DEIS and FEIS Section 4.10.2.
12. Final project design would be coordinated with the City of Moscow as appropriate.

ITD would like to thank you for your comments and participation in the development of the FEIS.

Sincerely,

KENNETH G. HELM
District Transportation Planner, Senior

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bcc: TPS2 EPS2 DE2

US95 Thorncreek Road to Moscow Realignment

Draft Environmental Impact Statement and Section 4(f) Evaluation

City of Moscow Public Works Department Review Comments

January 29, 2013

General Comments

1. All alignments should consider and address the future Ring Road intersection just south of the Primeland Silos. The preferred intersection type will be grade separated with associated on- and off-ramps. Option E-2 would likely allow for a highway overpass of the Ring Road as the highway comes down off of the finger ridge from Paradise Ridge. Consideration should be given in the project, if Option E-2 is selected, to including an overpass structure with this phase. In the event that the Ring Road is not constructed, the overpass will still serve the local access street system for this portion of the Area of City Impact without having the conflicts associated with an at grade intersection.
2. A potential US95 bypass to the west of the City of Moscow (Ring Road Southwest Quadrant) should be considered in the planning and design of the highway segment just south of the current City limits. While no physical improvements would be required at this time, the overpass option noted above could accommodate a bypass highway route.
3. For the section of existing US95 immediately south of the City of Moscow that will be realigned under Option E-2, consideration should be given to the continued operation of the existing commercial driveway approaches. In particular the approaches to the Primeland site will become somewhat removed from the highway. A reconfiguration of the existing site access to continue service and to resolve potential access conflicts should be considered.
4. There is an existing unnamed and undeveloped City street right of way in the center of the Primeland site that will ultimately serve both the Primeland parcels and the properties to the west. This is the only public right of way on the west side of the highway south of Palouse River Drive that is available to serve these properties. This public street access point will need to be maintained and a future intersection with the highway planned.
5. Staff recommends that ITD incorporate both Stormwater detention and treatment within the urbanized areas in the Area of City Impact south of Moscow. These standards are forthcoming under the City's Phase II NPDES Stormwater program and the incorporation of such facilities within project design construction will eliminate the need to design and construct retrofit treatment systems at a later date.

Plan Comments

1. Page 5 - Exhibit 3: Due to the nature of highway traffic volumes, speed, and noise a sidewalk placed immediately adjacent to the curb line provides an unsatisfactory walking option for most users. Consider adding a planter strip with a minimum width of five feet (seven preferred) between the curb and sidewalk. If this option is not possible due to right of way width limitations or other issues, a reasonably alternate would be to widen the sidewalk to at least seven feet. This will provide users more separation from the passing traffic.
2. Page 5 - Exhibit 3: Sufficient room in provided in the cross section for a bicycle lane on each side of the roadway, but the cross section does not designate the lanes. Confirm that it is the intent that these spaces will be used and designated as marked bicycle lanes.
3. Page 18 ES.9: The first paragraph in this section notes that there are no other major transportation projects planned for the area and that the Ring Road is in conceptual phase with no alignment proposed. The Ring Road concept has been developed to a point that an alignment is proposed based on topographic conditions, expected design standards (arterial vs. highway), and anticipated use (local arterial vs. bypass). The alignment has been included in the adopted City of Moscow Comprehensive Plan, the Latah County Comprehensive Plan, and the North Latah County Highway District Transportation System Plan. While a final detailed alignment has not been developed, in the area of the interaction with the US95 realignment project, the Ring Road alignment options are fairly limited. This report section should further address the Ring Road and the point of interaction between to the two projects.
4. Page 70 Section 3.2.3: First bullet in second paragraph discusses the Ring Road concept and indicates it has no “definitive alignment although it was proposed generally west of existing US-95”. This statement is incorrect in that the Ring Road is planned to encircle the entire City of Moscow and, thus, it will be on both sides of US95 with a crossing just south of the Primeland Silos as noted above. The report goes on to state that “the alternative to a western route would be an eastern route; however, several factors make the western route a more logical choice”. This statement is also in conflict with the Ring Road concept as noted previously. If the intent of this section was to address the ability of the Ring Road to act as a highway bypass in the future then it should be noted that the Ring Road concept and alignment have been based upon ITD design standards in the southwest quadrant (US 95 to SH8) and Minor Arterial Standards in all other quadrants. The southeast quadrant could be modified to an ITD standard fairly easily if there is ultimately a desire to reroute SH8 around the south end of town. A

reroute of US95 to the west of the City would include a portion in the State of Washington and Whitman County. Initial discussions with these two organizations have met with approval of the concept. The Ring Road alignment in the northwest quadrant does not support a bypass as it was anticipated that a western US95 bypass route would diverge from the Ring Road a short distance north of the crossings over SR270 and Airport Road.

5. Page 71 Section 3.2.3: The key policies noted for the Latah County Comprehensive Plan should denote that the Ring Road Concept is included as a transportation element in the area of the proposed US95 reroute.
6. Page 71 Section 3.2.3: The North Latah County Highway District Transportation Plan incorporates the Ring Road concept and alignment. The summary provided in this section should also reference that element.
7. Page 93 Section 3.7.3: The second paragraph references a document by Hashmi 1995 when stating that the aquifer levels have been declining at a rate of one to two feet per year. The document referenced is dated with respect to the current situation and more recent research performed in the basin. Contact should be made with the Palouse Basin Aquifer Committee regarding more current research findings and conclusions regarding the status of the aquifers. The third paragraph in this section notes that the Wanapum aquifer is a primary water source for rural residents. The City of Moscow also draws approximately 30% of its water supply from the Wanapum aquifer.
8. Page 115: The first paragraph in the Mass Transit section notes that the vanpool between Moscow and Lewiston is operated through the Palouse-Clearwater Environmental Institute. The City of Moscow took over operation of the vanpool system in June 2010.
9. Page 229 Table 68: The mitigation measures noted in the table include transportation related items, but do not reference the existing undeveloped City street right of way near the Primeland Silos or the planned Ring Road improvements. Both of these items should be included in the table with respect to how they will be addressed with a realignment of US95.

Date

Mr. Les MacDonald
City of Moscow Public Works
P.O. Box 9203
Moscow, ID 83843

RE: US-95 Throncreek Road to Moscow E-47 DEIS comments

Dear Mr. MacDonald:

The Idaho Transportation Department (ITD) received your e-mail regarding the referenced project and is providing the following as a follow-up to your concerns. The headers and numbers correspond to the comments in your letter.

General Comments

1. Based on discussions with City staff as part of the Community Impact Assessment update (2011), a final detailed Ring Road alignment had not been identified and funding had not been allocated or secured to finance the project. In addition, the Ring Road project would be an independent project that has a separate purpose and need from this project. Additional evaluation, a clear future funding source, and regional plan acceptance and adoption would be required to initiate additional infrastructure as part of this project. However, ITD will work closely with the City to ensure that the design of the US-95 project is consistent with and does not preclude construction of the Ring Road Project. The Final Environmental Impact Study (FEIS) Sections 3.2 and 4.2 have been modified to clarify the status and possible alignment of the proposed Ring Road project.
2. See response to General Comment #1 above.
3. Should an action alternative be selected, it would be an Expressway Access Controlled facility. Existing approaches would be allowed to remain at locations where construction of joint access is not economically justified. ITD will coordinate with business owners regarding access during final design when more detailed information is available. Language regarding these coordination efforts has been added to the FEIS Chapter 9, Environmental Commitments.
4. ITD will coordinate with the City regarding this public street access point. See response to General Comment 3 above.
5. The Draft Environmental Impact Study (DEIS) Section 2.4.2 describes that stormwater in the urban section would have curbs and gutters and stormwater would be collected and treated in accordance with applicable laws and regulations. This section in the FEIS and Chapter 9, Environmental Commitments has been modified to also state that it will be designed to meet the anticipated Phase II NPDES Stormwater requirements.

Plan Comments

1. The five-foot wide sidewalk meets AASHTO standards and is proposed for all of the action alternatives. Other design features including planter strips will be determined during the design phase and would be coordinated with the City of Moscow through ITD staff representation on the City of Moscow Entryway Beautification Project Steering Committee.
2. The shoulders on the right side of the highway on the rural and urban sections would be shared use lanes but would not be specifically marked for bicycle use.

Continued…

3. The Ring Road concept was not identified in the current approved Latah County Comprehensive Plan (2010). The updated City of Moscow Comprehensive Plan identifies that the Ring Road concept has not been adopted for the Latah County area of impact at the time of the DEIS. Additional detail regarding the Ring Road concept has been added to the FEIS Sections 3.2, 4.2 and 4.10. The information is also updated throughout the FEIS where the Ring Road concept is discussed.
4. Additional detail and updated information regarding the Ring Road concept has been added to the FEIS Sections 3.2, 4.2 and 4.10. The information is also updated throughout the FEIS where the Ring Road concept is discussed.
5. Additional detail and updated information regarding the Ring Road concept has been added to the FEIS Sections 3.2, 4.2 and 4.10.
6. The North Latah County Highway District Transportation Plan (2006) discusses the Ring Road concept, but does not list the project in its 20 year Roadway Improvement Program. Clarifying language was added to the FEIS Sections 3.2.
7. ITD has contacted the Palouse Basin Aquifer Committee. A Hydrogeologic Analysis technical report has been prepared since the DEIS was published. This report discusses potential groundwater impacts from the proposed alternatives. Information from this report has been summarized in the FEIS Sections 3.7 and 4.7.
8. This information was updated in the FEIS Section 3.10.3.
9. Additional evaluation, a clear future funding source, and regional plan acceptance and adoption would be required for ITD to construct additional infrastructure for the Ring Road concept as part of the selected alternative for the US-95 Thorncreek Road to Moscow project. However, ITD would like to work closely with the City to ensure that the design of the US-95 project is consistent with and does not preclude construction of the Ring Road concept. The commitment to coordinate with the City regarding the undeveloped city street access coordination for the proposed Ring Road concept was added to the FEIS Chapter 9, Environmental Commitments.

ITD would like to thank you for your comments and participation in the development of the FEIS.

Sincerely,

KENNETH G. HELM
District Transportation Planner, Senior

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bcc: TPS2 EPS2 DE2

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205-3026

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ER13/7

Electronically Filed

February 22, 2013

Adam Rush
Idaho Department of Transportation
ITD Office of Communications
3311 W. State Street
Boise, ID 83707

Dear Mr. Rush:

The Department of the Interior (Department) has reviewed the Federal Highway Administration's (Administration) Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the Proposed Realignment of Thorncreek Road to Moscow, Latah County, ID. The purpose of this project is to improve public safety and increase highway capacity on US-95 south of Moscow between Thorncreek Road (MP 337.67) and the South fork Palouse River Bridge (MPO 344.00). The Department offers the following comments for your consideration.

SECTION 4(f) EVALUATION COMMENTS

The Department concurs that the preferred alternative selected E-2 would avoid Section 4(f) resources. We acknowledge your consultation with the SHPO and recommend continued consultation with the SHPO to ensure that all measures have been taken to minimize harm to Section 4(f) resources should the preferred alternative change.

GENERAL COMMENTS

These comments are provided pursuant to the Endangered Species Act (ESA), as amended (16 U.S.C. § 1531 *et seq.*); Fish and Wildlife Coordination Act, as amended (16 U.S.C. § 661 *et seq.*); the Migratory Bird Treaty Act (MBTA), as amended (16 U.S.C. § 703); and the National Environmental Policy Act (42 U.S.C. § 4321 *et seq.*). Our comments reflect considerable concern about the environmental impacts of the proposed action, and for potential project-related impacts should the Administration's preferred alternative be selected for construction.

Mitigation Recommendations

In addition to the mitigation recommendations provided in our Specific Comments, we are providing some additional mitigation measures that are applicable to any alternative selected by the Administration. We recommend that the following measures be included in the Final Environmental Impact Statement (FEIS) for the proposed action:

1) Native Vegetation: Native grasses, shrubs or trees should be used to restore disturbed areas requiring the removal of native vegetation during construction. In addition, these sites should be monitored in subsequent years to ensure the success of the restoration effort. The U.S. Fish and Wildlife Service (Service) would be willing to provide a list of native plants for consideration in a planting program.

2) Weed Control: An integrated weed management plan should be developed and funded to prevent weed establishment and spread in Palouse prairie remnants throughout the 0.6 mile weed impact zone identified by the Administration technical documentation.

3) Accommodation for Wildlife Migration Corridors: See our comments 12, 13, and 23 below (Specific Comments), pertaining to wildlife crossings.

SPECIFIC COMMENTS

1) Section ES.6, Table 1, Summary of Alternatives' Benefits and Effects, page 13: According to Table 1, 3.61 *"wetland (acres)"* would be affected by alternative E-2; however, the 2006 Wetlands Functional Assessment prepared by Shelly Gilmore for the Idaho Department of Transportation (ITD) for this project (Gilmore 2006) documented 4.9 acres of wetland impact for the same alignment. The FEIS should disclose the source of this discrepancy and provide documentation to support the different numbers. The 2012 Wetland Delineation Technical Report provided with the DEIS does not explain the discrepancy (Gilmore 2012).

2) Section ES.8, Topics of Concern or Controversy, page 16: *"IDFG, EPA, and USFWS prefer the C-3 Alternative to the E-2 Alternative. This is primarily due to the perceived effects of the E-2 Alternative on wildlife habitat and movement based on its proximity to Paradise Ridge."*

   The Service has determined that implementing the E-2 alternative would result in the greatest impact to Palouse prairie habitat, including wildlife, sensitive plants, and high value wetlands, therefore the remaining two action alternatives (evaluated in the DEIS) would have lesser impacts to resources of concern to the Service. Please see our Summary Comments, below.

3) Section ES.8 Topics of Concern or Controversy, page17: *"In December 2010, ITD transmitted the findings to IDFG in a report titled Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to*

Moscow (Sawyer 2010) which concluded that ...mitigation for direct habitat loss, indirect habitat loss, or loss of connectivity for moose or elk was not warranted."

Given that ITD commissioned four different wildlife experts (Melquist, Ruediger, Sawyer and Idaho Department of Fish and Game (IDFG)) that came to differing conclusions regarding impacts to large ungulates and mitigation recommendations, the FEIS should discuss how the Administration reconciled what the project impacts to ungulates will be and what mitigation is, or is not, warranted.

4) Section 2.5.2, Screen Alternatives, Eastern Corridor, page 45: *"The E-2 Alternative was forwarded for further consideration because it . . . . . was the only alternative not to affect rare plant communities."*

On the contrary, due to its close proximity to Paradise Ridge, the E-2 alternative would have the highest impact on Palouse prairie remnants and rare plant restoration efforts being conducted by the Service and other resource entities such as the Latah Soil and Water Conservation District and the IDFG. This statement should be modified in the FEIS to reflect that E-2 will have the greatest impact on rare plant communities.

5) Section 2.6, Comparison of Alternatives, E-2 (Preferred Alternative): *"The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge . . . ."*

This paragraph should be modified in the FEIS to show that the Paradise Ridge area is also considered a key conservation area for *Silene spaldingii* (ESA listed threatened) and that the weed effects of implementing alternative E-2 would extend all the way to the top of Paradise Ridge, thus affecting the largest remaining Palouse prairie remnant in Latah County.

6) Section 3.8.2, Methodology, Vegetation Studies, page 95:
Additional information was provided to the ITD by the Service concerning vegetation found in the action area, including a 2012 report entitled *"Conservation of the Palouse Prairie Ecosystem, Phase 3, Site Assessment of Potential Remnants of Palouse Grassland in Latah County, Idaho"* (Hill 2012). Associated GIS data layers and maps were also provided to ITD in 2012. The FEIS should incorporate this additional data where applicable.

7) Section 3.8.3, Existing Conditions, Palouse Bioregion, page 96: *"The Palouse Grasslands are considered by the Idaho Natural Heritage Program to be one of the most endangered ecosystems in the US (Noss et al. 1995)."*

The referenced document (Noss et al.) was published by the National Biological Service (now Biological Resources Division, U.S. Geological Survey) and therefore reflects the scientific determination by the Department (with concurrence by the State of Idaho Natural Heritage Program) that Palouse prairie is critically endangered (>98% decline). In addition, several of the Palouse Grassland plant associations are considered globally

imperiled by The Nature Conservancy and Natural Heritage/Conservation Data Center network (Grossman et al. 1994). The FEIS should include a discussion that addresses the consensus of multiple agencies and organizations that the Palouse prairie is a critically endangered ecosystem.

8) Section 3.8.3, Existing Conditions, Invasive Plants, page 100: *"...five species of noxious weeds were found in the project area (Lass and Prather 2007)."*

   Lass and Prather also found 27 other invasive plant species of concern in the project area and specifically identified the Palouse prairie remnants east of the proposed alignments as being the most vulnerable, especially from wind dispersed seed. Because of this, the E-2 alignment would have the greatest weed impact on Palouse prairie remnants. The Administration's analysis of the effects of invasive plant species associated with the implementation of the various alternatives on native plant communities is incomplete throughout the DEIS. The potential loss of the few remaining Palouse prairie remnants through conversion to non-native vegetation due to increased weed pressure from the various alternatives should be thoroughly discussed in the FEIS. The FEIS should also include a detailed discussion of measures to implement weed spread and establishment prevention, monitoring and mitigation for the entire 0.6 mile weed impact area identified by Lass and Prather (Lass and Prather 2007).

9) Section 3.9.3, Existing Conditions, Spalding's catchfly, page 110: *"The next closest known occurrences of the species are 10 miles from the project area in Genesee and 15 miles west of the project area in Colton, Washington (ITD 2005). USFWS completed additional surveys from 2008 to 2010; however no new plants were identified in the project area (Hill 2012)."*

   Although no new occurrences of Spalding's catchfly (*Silene spaldingii)* were found in the project area by Hill, new occurrences of that plant species were found closer than 10 miles from the project area. Hill's 2011 report documents a new occurrence found in 2008 approximately 8 miles from the project area and another new occurrence documented in 2009, also approximately 8 miles from the project area. This documentation was provided to ITD by the Service in November 2012. The Administration should incorporate this updated information into the FEIS.

10) Section 4.2 Land Use and Recreation Effects, E-2 (Preferred Alternative), page 143: *"E-2 would affect the same types of land use categories as the other alternatives; but would affect more CRP land than other alternatives."*

   The difference in impacts to the Conservation Reserve Program (CRP) land among the alternatives is significant; 43.5 acres along the E2 alignment versus 9 acres each along the C3 and W4 alignments. Breeding Bird Surveys indicate that no other avian habitat group or guild has as many declining populations as do grassland nesting birds (Peterjohn and Sauer 1999). Studies show that some grassland nesting species prefer CRP land to other available habitat (Johnson and Igl 1995, Cunningham 2000), thus loss of CRP land could cause declines in these species' local populations.

Given that the E-2 alignment will disproportionately affect CRP lands, the Administration should include an analysis of project alternatives on migratory bird nesting habitat on CRP lands in the FEIS for this action.

11) Section 4.6.2, Wetland Effects, Table 45, Page 155:
According to the DEIS, the E-2 alignment is the only alternative that impacts palustrine scrub-shrub (PSS) wetlands. Additionally, it is the only alignment that impacts a wetland adjacent to a pine stand. The temporal loss of the functions and values associated with PSS wetlands are typically longer than that of emergent wetlands. This is because the plant community associated with PSS wetlands is dominated by woody vegetation, such as trees and shrubs up to 20 feet in height. This vegetation takes longer to mature to a point that replaces the existing functions and values (Cowardin et al. 1979). The FEIS should show the extent of this temporal loss and how these losses will be mitigated.

12) Section 4.6.2, Wetland Effects, E-2 (Preferred Alternative), Avoidance, Minimization and Mitigation, Page 158: *"404(b)(1) Guidelines require all appropriate and practicable steps be taken to minimize adverse effects to the aquatic system, including compensatory mitigation. Wetland impacts that cannot be avoided or minimized further will be mitigated through a compensatory mitigation process."*

The Service has adopted the same definition and sequential approach to mitigation as found in the NEPA regulations. First, avoid the impact altogether by not taking a certain action or parts of an action; second, minimize impacts by limiting the degree or magnitude of the action and its implementation; third, rectify the impact by repairing, rehabilitating, or restoring the affected environment; fourth, reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action; and last, compensate for the impact by replacing or providing substitute resources or environments. This sequential approach is similar to that used by the EPA (USFWS 1981, EPA 2013). The Wetland Effects section of the FEIS should include a thorough analysis using NEPA's sequential approach to mitigation for wetland impacts, by first avoiding impacts and second, minimizing impacts, before discussing compensatory mitigation for those impacts. Minimizing the impact of the action to wetlands could include implementing measures that would not degrade their function and value (e.g. bridging wetlands to allow the movement of wildlife through the road prism).

13) Section 4.6.2, Wetland Effects, E-2, Avoidance, Minimization and Mitigation, Page 158. *"For the Action Alternatives there will be between 0.99 and 5.45 acres of unavoidable wetland impacts."*

According to Table 2 in the DEIS, a total of 3.61 acres of wetlands would be affected by the implementation of the preferred E-2 alternative. Of this total, 0.92 acres are classified as PSS wetlands, a wetland type that is unique to the E-2 alignment. This wetland type can provide habitat for an array of wildlife including migratory birds. Because of the cover they provide and availability of water, PSS wetlands are often used as movement corridors for various wildlife species, including large and small mammals. At a

minimum, the continuity of PSS wetlands at two locations along the E-2 alignment will be fragmented if the preferred alternative is implemented. The DEIS does not indicate what measures would be taken to avoid or minimize the impact to these wetlands and associated wildlife habitat function and value. For example, the FEIS should show if there are any provisions in project design, such as bridging or sufficiently sized culverts at these locations (PSS), which would allow the movement of large and small mammals through the road prism.

14) Section 4.6.2, Wetland Effects, E-2, Avoidance, Minimization and Mitigation, Page 158. *"Mitigation will be implemented according to 33 CFR 325 . . . . and will replace any lost functions and values."*

This sentence should be modified by adding the word *"compensatory"* preceding the word *"mitigation."*

15) Section 4.8.3, Palouse Restoration Project Effects, page 167:
This section does not discuss the significant Federal investment in habitat restoration and easement acquisitions in the area of Paradise Ridge and the effects of increased weed establishment risk from the E-2 alignment's proximity. Significant Federal funds have been spent controlling weeds in existing Palouse prairie remnants that are within the 0.6 mile weed impact area identified in the DEIS. An analysis comparing the weed impacts of the three alternatives to federally funded habitat restoration within the 0.6 miles weed corridor should be included in the FEIS. The Administration should analyze the increased cost of weed control and new weed invasion risk to these restoration efforts in the FEIS for this action.

16) Section 4.8.5, Pine Stand Effects, Page 169: *"The pygmy nuthatch is protected under the Migratory Bird Treaty Act . . . . ."*

In addition to protection provided under the MBTA, the pygmy nuthatch (*Sitta pygmaea*) is considered a protected nongame species designated critically imperiled (S-1) by the IDFG and a species of conservation concern by the Service. The declining population trend for this species within Idaho has been attributed to the loss and degradation of ponderosa pine forest habitat (IDFG 2005). The FEIS should provide an analysis of the E-2 alignment effects to the pine stand. This detailed analysis should determine whether either of the two remaining fragments will be large enough to support pygmy nuthatch nesting, or if the fragmentation and road disturbance will result in the functional loss of the entire pine stand as habitat for the pygmy nuthatch. A study at Harvard University (Foreman 2000) found that road noise has a major effect on forest nesting birds by its interference with bird communication during incubation and fledgling phases of reproduction. For forest birds as a whole and for the most sensitive species, effect-distances in woodland extend hundreds of meters from a busy road. The population density of the most sensitive forest-interior species is reduced in woods up to 650 m from a main road. In this zone the population is one-third lower than that at greater distances.

17) Section 4.8.5, Pine Stand Effects, Page 169: *"...could offer potential nesting habitat for...pygmy nuthatch..."*

The technical document provided with the DEIS (Melquist 2005) states on page 11 that pygmy nuthatches are already known to nest in this pine stand. The FEIS should be consistent with this technical document that pygmy nuthatches are already known to nest in the pine stand, or provide the rationale for the discrepancy.

18) Section 4.8.5, Pine Stand Effects, Page 169: *"The loss of this habitat is considered minor and there is an abundance of suitable habitat nearby at Paradise Ridge."*

There is no data provided in the DEIS or the technical documents to support this conclusion. To support this conclusion, the Administration should provide documentation in the FEIS. Pygmy nuthatches are year-round residents; in order for the nuthatches from the affected pine stand to move to suitable habitat on Paradise Ridge, there must be suitable, but unoccupied pygmy nuthatch habitat available on Paradise Ridge. The technical document (Melquist 2005) recommends avoiding construction along the E2 corridor; the FEIS should be consistent with technical documents, or explain the rationale for the discrepancy.

19) Section 6.1.3, Existing Conditions, Indirect Effects, Vegetation, Page 206: *"Intensively managed cropland is believed to provide a more efficient buffer to new weed invasion compared to native vegetation or CRP."*

This statement is not supported by Lass and Prather nor does the DEIS include citation to support this statement. Therefore, supporting documentation for this statement should be provided in the FEIS.

20) Section 6.1.3 Existing Conditions, Vegetation, page 207:
In addition to the discussion concerning impacts to currently extant Spalding's catchfly plants, this section should also include a discussion concerning the project's impacts to the Paradise Ridge/Gormsen Butte Key Conservation Area (Key Conservation Area) identified in the Spalding's catchfly recovery plan (USFWS 2007). Portions of Alternative E-2 are adjacent to this Key Conservation Area and could limit the ability to meet the recovery goal of 500 Spalding's catchfly plants sustained over 20 years in this area. This Key Conservation Area is one of only three Key Conservation Areas within the Palouse Physiographic region for recovery of this plant. The Service has been working with numerous landowners and conservation partners in preparation for reintroduction, protection and long-term recovery of Spalding's catchfly in this area. The analysis in the DEIS of project-related effects to this recovery effort does not adequately evaluate the impact of increased weed pressure on the lost term viability of this Key Conservation Area. Thus, the discussion should be expanded in the FEIS to thoroughly address this issue.

Also, this section does not include a discussion concerning the significant Federal investment in habitat restoration and easements in the area of Paradise Ridge, nor the

effects of increased weed establishment risk from the E-2 alignment's proximity. Significant Federal funds have been spent controlling weeds in existing Palouse prairie remnants within the 0.6 mile weed impact area identified in the DEIS. The FEIS should include an analysis of the increased cost of weed control and new weed invasion risk to these restoration efforts.

21) Section 6.2.3 Cumulative Effects to Resources, Wildlife and Vegetation, page 210: *"The remaining Palouse remnants continue to be eliminated through conversion to cropland..."*

This statement is not accurate, due to the fact that there is little, if any, on-going conversion of Palouse prairie remnants to cropland. Starting about 1880, farmers began to convert Palouse grasslands to row crops and by about 1910 all areas that could be plowed were brought into cropland (Daubenmire 1940; Buechner 1953; Tisdale 1961). The text in the FEIS should be modified to reflect this information.

22) Section 6.2.3 Cumulative Effects to Resources, Wildlife and Vegetation, page 211: *"Because of their isolation, gene flow is restricted, which may contribute to reduced diversity and genetic fitness of the populations."*

The DEIS does not provide any documentation or citation to support the above statement, which we consider inaccurate. Researchers at both the University of Idaho and Washington State University have secured significant funding to investigate Palouse Prairie remnants from multiple perspectives. Their work to date indicates an extremely high species diversity and abundance of pollinators, ground-dwelling beetles, and soil biota – even despite the small patch size of remnants – when compared to adjacent conventionally-tilled and minimum-tilled croplands. The rate of endemism of the ground-dwelling beetles is particularly remarkable, and suggests that loss of Palouse Prairie remnants could result in the loss of populations and species (Shepherd and Debinski 2005), (Niwa 2001), (Hatten 2006), (Hatten et al 2006), (Looney and Eigenbrode 2003). This section should be modified in the FEIS to reflect the high biodiversity of Palouse prairie remnants in the project area.

23) Section 9, Environmental Commitments Table 68, Mitigation Measures, Vegetation, Fish and Wildlife, Page 231: *"Tree removal will be accomplished during a "work window" provided by the Idaho Department of Fish & Game . . . ."*

The Department agrees that the proponent should avoid any activity such as land clearing involving removal of vegetation that may provide nesting habitat for avian species during migratory bird nesting season. Avian nesting generally occurs in northern Idaho from April 1st through August 1st each year, although these dates may vary based on species and location (FSA 2010). Administration commitment to this conservation measure in the FEIS would help minimize impacts to avian species protected under the MBTA.

24) Section 9, Environmental Commitments Table 68, Mitigation Measures, Vegetation, Fish and Wildlife, Page 231: *"Where practicable, culvert designs may include box culverts, bottomless box culverts . . ."*

Although not specifically mentioned in this section of the table, these measures appear to be intended partly to accommodate the movement of wildlife through the road prism. We recommend that the Administration provide wildlife crossing structures to accommodate the migration of small and large mammals that may be present in the project area, such as elk, moose and white tailed deer. These crossing structures would provide connectivity between habitats and should add a measure of safety for vehicular traffic using any of the three proposed alignments. An overview of conceptual designs for various wildlife crossings can be found in the Administration's online publication *"Critter Crossings – Linking Habitats and Reducing Roadkill."* Wildlife road crossings should receive full analysis in the FEIS for this action (FHWA 2013).

Additionally, two of the wildlife technical reports provided with the DEIS recommend wildlife crossing structures. Ruediger (2007) recommends both small and large mammal crossing structures for all three alignments. Melquist (2005b) recommends at least one wildlife crossing structure for all three alignments. Additional mitigation is recommended by Melquist if the eastern alignment is selected including providing secure habitat (through easements or land acquisition). The FEIS should either explain why these recommendations were not incorporated into the project as mitigation measures or they should be incorporated as such.

25) Section 9, Environmental Commitments, Table 68, Wetlands and Tributaries: Under the Service's mitigation policy, the *"First priority will be given to the recommendation of a mitigation site within the planning area."* (USFWS 1981). Although some conceptual mitigation proposals are listed in Table 68, this section does not commit to a specific location for the compensatory wetland mitigation, nor whether it would be in-kind or out-of-kind for the unavoidable loss of wetland function and value. For example, if the E-2 alternative is selected, 0.92 acres of PSS type wetlands would be directly impacted. The following statement under section 3.6.1 (Regulatory Framework and Policies) in the DEIS, *"Lands meeting the definition of wetland, but which are not considered jurisdictional by the USACE are still considered under 23 CFR 777 Mitigation for Wetlands and Aquatic Habitats which requires a no net loss of wetland functions and value"* indicates that the Administration will provide full replacement of function and value for unavoidable loss of wetlands due to the project. This commitment warrants full disclosure in the environmental commitment section of the FEIS.

SUMMARY COMMENTS

Based on our review of the information provided in the DEIS, and other pertinent information obtained to date, the Department has concluded that of the three action alternatives evaluated in the DEIS, the E-2 alignment or *"preferred alternative"* would have the greatest impact to the Palouse prairie, a nationally recognized critically endangered ecosystem, as well as to associated habitats and plant species, including the recovery of Spalding's catchfly, an ESA listed plant

species. Additionally, other wildlife, that has been observed, or may be present, in the project area include long-eared myotis (*Myotis evotis*), northern alligator lizard (*Elgaria coerulea*), and pygmy nuthatch (*Sitta pygmaea*). These species are considered Protected Species by the IDFG (IDFG 2013). Pygmy nuthatch is also protected under the MBTA. As mentioned in our comments above, the Federal government, including the Service, has invested considerable funding and effort to protect and restore Palouse prairie habitats, which would be impacted more by the preferred alternative than the other two action alternatives evaluated in the DEIS.

The Department appreciates the opportunity to comment on the proposal and looks forward to our comments and concerns being addressed in the FEIS. Technical assistance requests, comments, and additional documents, should be directed to Juliet Barenti, Fish and Wildlife Biologist, U.S. Fish and Wildlife Service, Northern Idaho Field Office, 11103 E. Montgomery Drive, Spokane, Washington 99206, telephone: 509-893-8005. Should you have questions about the Section 4(f) Evaluation comments, please contact Alan Schmierer, National Park Service, Pacific West Regional Office, telephone: 415-623-2315. If you have any other questions, please contact me at 503-326-2489.

Sincerely,

Allison O'Brien

Allison O'Brien
Regional Environmental Officer

cc:
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Department of Interior
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Washington, DC 20240

RE: US-95 Thorncreek Road to Moscow L-26 DEIS comments

Dear Sir or Madam:

The Idaho Transportation Department (ITD) received your letter regarding the referenced project. We acknowledge your concurrence with the 4(f) Evaluation for the project. ITD and Federal Highways Administration (FHWA) will continue to consult with SHPO as needed throughout the EIS process and during development of the selected alternative. The headers and numbers below correspond to your comment letter.

General Comments
ITD and FHWA acknowledge that the Department has considerable concern regarding the environmental impacts should the E-2 Alternative be selected. ITD and FHWA appreciate your mitigation recommendations and have incorporated them into the project as follows:

1. We would appreciate it if you send your list of recommended native vegetation. We would like to utilize the list during development of the re-vegetation plan for the selected alternative. See the FEIS Section 4.8 and Chapter 9, Environmental Commitments.
2. ITD and FHWA have committed to successfully implementing ITD's Vegetation Management Plan that will help minimize the establishment and spread of weeds. This commitment has been further refined during design to include monitoring and implementation of control measures specific to documented Palouse Remnants. See DEIS and FEIS Chapter 9, Environmental Commitments.
3. Accommodation for Wildlife Migration Corridors
   a) Since the DEIS publication ITD and FHWA have met with USFWS and IDFG and come to an agreement on mitigation measures for wildlife and habitat. These measures are described in the FEIS Chapter 9, Environmental Commitments. ITD and FHWA are committed to continue to work with USFWS and IDFG through final design and project implementation to further refine the mitigation measures and to help ensure their success. Overpass structures for county roads and culverts for streams and riparian areas will be constructed with adequate width to provide wildlife passage. This may include potential retrofitting of existing structures where appropriate. ITD and FHWA will work closely with IDFG during design to determine details of the mitigation. ITD will also collaborate with USFWS and other resource agencies during design regarding weed control and Vegetation Management. Provisions for wildlife crossings will only be made where wildlife use is expected and where wildlife is welcome on private lands (deer, elk and moose).

Continued…

The mitigation measure addressing timing for vegetation removal in the DEIS was revised to include specific dates so that it would avoid disturbing migratory birds during the nesting season. See FEIS Chapter 9, Environmental Commitments.

Specific Comments

1) Section ES.6, Table 1. The discrepancy of wetland impact indicated in your letter (4.9 acres vs. 3.61 acres) compared the DEIS page 13 to a draft Wetland Functional Assessment report (Gilmore 2006) that was circulated as a draft for review in 2006 but was never finalized, nor was it circulated with the DEIS for public comment. The functional assessment and wetland delineation information is combined into one report titled *Wetland Delineation Technical Report (Gilmore 2012),* which was provided as a Technical Report to the DEIS during the recent public comment period. This 2012 report (Gilmore 2012) does not include impact calculations. Wetland impact calculations are only included in the DEIS narrative; therefore, the 3.61 acres of wetland impacts for the E-2 Alternative which was stated on page 13 of the DEIS is correct. Please do not consider the draft Wetland Functional Assessment report (Gilmore 2006) as part of the DEIS submission.
2) Section ES.8, Topics of Concern or Controversy-We acknowledge that USFWS has determined that the E-2 Alternative would result in the greatest impact to Palouse Prairie habitat, including wildlife, sensitive plants and high value wetlands. However ITD and FHWA maintain that the E-2 Alternative would have the greatest safety benefit. We have also proposed mitigation to help offset resource impacts as stated in the FEIS Chapter 9, Environmental Commitments. Please see Section 2.6 for additional explanation of why ITD and FHWA have identified the E-2 Alternative for their Preferred Alternative.
3) Section ES.8, Topics of Concern of Controversy-The following was added to the FEIS Section ES.8 and Section 3.8:

ITD commissioned four different wildlife experts to assess impacts and mitigation for large ungulates. The general descriptions of the reports are in the DEIS Section 3.8.2 Wildlife Studies. Each of the experts had similar conclusions regarding the quality of available habitat in the study areas and the relative impacts of the alternatives on that habitat which is stated in the DEIS and FEIS.

The Sawyer report was intended to evaluate the mitigation recommendations for the project. Sawyer evaluated and summarized ungulate habitat in the corridors and the relative impacts by alternative. The Sawyer report found that the Melquist and Ruediger reports were consistent regarding general habitat quality and the relative alternatives' effects to habitat. The Sawyer report also provided new information that was available since the previous reports were prepared which also supported the conclusions of the reports. That information was presented in the DEIS.

Both Ruediger and Melquist stated that the alternatives would not have population level effects to ungulates and that no mitigation was required for population level effects. Both offered optional recommendations that included wildlife crossing, fencing, habitat preservation and other measures that could benefit individuals and mitigate for animal vehicle collisions; however, these were not required, nor are they likely to be effective without land use control in the surrounding properties.

Continued…

Melquist's report under Mitigation Requirements (page 24) stated that there would be no population level impacts due to the alternatives and therefore mitigation was not required. However, he acknowledges that there may be impacts to individual ungulates through increased road kills, possible habitat avoidance, and increased risks to motorists and offers seven recommended actions that would benefit deer, elk, moose, and other wildlife should transportation corridors be constructed. These recommendations include one or two possible wildlife crossings near draws, fencing associated with the crossings, habitat preservation near those crossings and other measures. However, he further states that not implementing a recommended action would not jeopardize populations of any of the species.

Animal/vehicle collisions (AVCs) and associated risks to motorists were considered in the AASHTO Safety Analysis and are mitigated for in the proposed alternatives' design. Clearing vegetation from the clear zone (highway right-of-way), widening the roadway and improving the sight distance are all mitigating factors that are expected to significantly reduce the animal vehicle crashes (AVC). On US-20 between MP 369 and 375, similar improvements reduced the AVC by 85 percent (ITD 2012). To further mitigate for the possible AVCs, if the E-2 Alternative is selected, ITD has committed to monitoring AVCs and taking action to address AVCs should it be identified as a problem as a result of the monitoring.

Ruediger did not recommend stand-alone large game crossings nor did he recommend replacement of lost wildlife habitat. However, in recognition of the resource agencies' desire for mitigation, he made three optional recommendations, all of which were considered and included in the DEIS Chapter 9, Environmental Commitments. These were 1) to provide a wildlife/vehicle crossing at county road underpasses of US-95 where wildlife use is expected and where wildlife are welcome on private lands (deer, elk and moose), 2) to provide oversized culverts to allow for small terrestrial movement and 3) to replace water sources on the east side of the highway should water sources be impacted. Fencing will also be provided to prevent animals from getting onto the highway in areas where collisions are most likely and to funnel wildlife into crossings. Additional detail about the crossings for small terrestrial movement and fencing has been added to the FEIS Chapter 9, Environmental Commitments.

4) Section 2.5.2, Screen Alternatives, Eastern Corridor page 45-The referenced statement has been further clarified to indicate that the E-2 Alternative would not directly affect rare plant communities. See FEIS, Section 2.5.2. The DEIS and the FEIS both disclose that the E-2 Alternative would have the greatest indirect effect to rare plant restoration efforts (DEIS page 167) because it would be closer to planned and ongoing restoration efforts compared to the other Action Alternatives and could result in weed establishment and spread. The discussion of indirect effects is included in DEIS (and FEIS) Section 6.1.3. The discussion of impacts to the planned and ongoing rare plant restoration projects is in the DEIS and FEIS Section 4.8.3 and in Chapter 6, Indirect and Cumulative Effects.
5) Section 2.6 Comparison of Alternatives-The FEIS Section 2.6, Comparison of Alternatives was modified to state that the E-2 Alternative would be located closer to planned and ongoing Palouse Restoration Projects and a key conservation area for *Silene spaldingii*. More detail regarding potential weed dispersal on Paradise Ridge due to the E-2 Alternative and existing and future development, has been added to the FEIS, Chapter 6, Indirect and Cumulative Effects. Additional text regarding impacts to a key conservation area for *Silene spaldingii* was also added to the FEIS Section 3.9.3 Existing Conditions under Spalding's catchfly.

6) Section 3.8.2 Methodology-ITD and FHWA appreciate the reports and GIS data provided. This report and GIS information was reviewed just before publication of the DEIS and was incorporated on page 98 of the DEIS. When comparing the GIS data, the Palouse Grasslands (PG) remnant data, which was provided with the report, were many small polygons of grassland, which encompassed a much smaller area than the remnants that were identified in ITD's 2005 report. Therefore, the 2005 data was used but was supplemented to include two additional remnant areas that were not previously identified.
7) Section 3.8.3, Existing Conditions has been expanded to describe that the US Department of Interior with concurrence by the state of Idaho Natural Heritage Program considers the Palouse prairie to be critically endangered. Additional statements regarding other agency and organizations position of the ecosystem has also been added.
8) Additional information regarding the existing weeds and invasive plants and the potential for weed dispersal as a result of the alternatives has been added to the FEIS Sections 3.8, 3.9, 4.8, 4.9 and Chapter 6, Indirect and Cumulative Effects. Mitigation for potential weed dispersal is presented in Chapter 9, Environmental Commitments.
9) Thank you for the correction. The distance to the nearest *Silene spaldingii* population was updated from 10 miles to 8 miles in the FEIS Section 3.9.3 under Spalding's catchfly.
10) Additional information regarding migratory bird nesting habitat on CRP lands and the alternatives impacts to migratory birds and their nesting habitat has been added to the FEIS Section 3.8.3 under Grassland Habitat and under FEIS Section 4.8.
11) Nest boxes will be placed to provide temporary nesting opportunities for pygmy nuthatch. ITD will minimize the impacts to the PSS wetlands during the design by utilizing engineering solutions such as reducing the fill slopes or using crossings that span the wetlands where practicable to allow for large wildlife movement. This will involve the use of crossings to minimize impacts to PSS wetlands (Wetlands 13 and 32) and help facilitate wildlife movement through the riparian corridor. Native trees and shrubs that must be removed will be made available for salvaging and restoration either within the project limits or for projects nearby.
12) The measures taken to avoid, minimize harm to and provide compensatory mitigation for wetland effects are described in Section 4.6, under Executive Order 11990 and in the FEIS Chapter 9, Environmental Commitments.
13) ITD will minimize the impacts to the PSS wetlands during the design by utilizing engineering solutions such as reducing the fill slopes or using crossings that span the wetlands where practicable to allow for large wildlife movement. This will involve the use of crossings to minimize impacts to PSS wetlands (Wetlands 13 and 32) and help facilitate wildlife movement through the riparian corridor. This has been reflected in FEIS Section 4.6 and Chapter 9, Environmental Commitments.
14) The FEIS Section 4.6.2 Wetland Effects was modified to specify "compensatory" mitigation.
15) Additional information regarding the relative effects of the alignments on the restoration efforts and the funding that has been applied to restoration efforts is included in FEIS Section 4.8.3. Mitigation will include the development and implementation of weed control efforts within 0.6 miles of the area with special focus on Paradise Ridge including the restoration areas.
16) Additional detail regarding the effects of the E-2 Alternative on the pine stands and the resulting effects to pygmy nuthatch has been added to the FEIS Section 4.8. Based on the

analysis, the remaining stands will be large enough to support pygmy nuthatch but there could be fragmentation of the habitat due to tree removal. The effects of noise on birds vary with traffic volume, speed, wildlife species and habitats.

The study that you referenced (Foreman 2000) has useful information regarding the effects of busy roads on wildlife. The study indicated that traffic noise from busy roadways could affect bird communication for grassland birds. However, it must be recognized that the study was based on a road with traffic volumes measured between 45,000 to 150,000 vehicles per day, which is between 5 and 18 times greater than the Thorncreek Road to Moscow project. The study also did not measure the noise levels. Based on FHWA noise tables, traffic volumes and their predicted noise levels for the studied roadway are much higher than the predicted levels for the existing corridor.

In a more recent Massachusetts (USA) study by the same author (Foreman, et al, 2003), highways with moderate traffic volume (8,000-15,000 ADT) there was no effect on bird presence, although breeding was affected for 400 meters. For relatively light traffic volume (3,000-8,000 ADT) there was no significant effect on grassland bird distribution. This study of the light traffic volumes is more comparable to this project than the study of the high volume roadway. Additional information regarding the potential effects of noise on birds has been incorporated into the FEIS section 4.8. and 6.1. Additional detail regarding the E-2 Alternative's effects on the pine stand and the effects to pygmy nuthatch are also included.

17) Melquist did not observe nesting pygmy in the pine stand. His comments are based on information from the landowner, Kas Dumroese. Melquist states that pygmy nuthatches were observed and the landowner heard vocalizations. While nesting in this stand was not observed, the landowner had observed juveniles soliciting adults for food at his bird feeders, suggesting that nesting occurs in the vicinity. For this reason, the DEIS described that the pine stands are "potential" nesting habitat. See the FEIS Chapter 9, Environmental Commitments for mitigation measures.
18) The referenced statement has been removed and the discussion of pygmy nuthatch has been revised. See FEIS Section 4.8. The report recommends that the pine stands be avoided to reduce impacts to pygmy nuthatch, however, there are other factors to weigh including safety, displacements and effects to cultural resources.
19) The statement was obtained from the Lass and Prather report on page 12. The reference to that technical report has been added to FEIS Section 4.8.
20) The long-term viability of the Key Conservation Area may be affected by the alternatives but will also be affected to a greater extent by the existing development and continued development in and around the Key Conservation Area. The project will help to minimize harm by limiting access along the roadway, which will reduce development pressures. However, based on the existing zoning and building permits, development is expected to continue around the Key Conservation Area. This could contribute to the long-term, cumulative effects to the Key Conservation Areas. Additional information has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. ITD and FHWA suggest that the development be addressed as part of the municipal planning process through land use planning and protective ordinances. ITD has also proposed mitigation measures and

standard practices that could reduce indirect effects as a result of the alternatives. See FEIS Chapter 9, Environmental Commitments.

Additional information regarding the projects impacts to the long-term viability of the Paradise Ridge/Gormsen Butte Key Conservation Area (USFWS 2007) was added to the FEIS Section 6.2 Cumulative Effects.

21) The referenced statement on page 210 of the DEIS was revised in the FEIS Section 4.3.
22) The reference *"(Peterson 2008)"* was added to the FEIS Section 6.2 Cumulative Effects and to the FEIS Reference section as follows*: "Peterson, A., I. V. Bartish, and J. Peterson. 2008. Effects of population size on genetic diversity, fitness, and pollinator community composition in fragmented populations of Anthericum liliago L. Plant Ecology 198:101-110".* Additional information regarding biodiversity of the Palouse remnants has been added to the FEIS Section 3.8 and 4.8.
23) The commitment to conduct tree removal between August 2 and March 30 to avoid impacts to nesting migratory birds was added to the FEIS, Chapter 9, Environmental Commitments in the table of mitigation measures.
24) Additional information regarding the mitigation measures for large and small wildlife and rationale for not including all of the recommended wildlife crossings by all of the report authors, has been added to the FEIS Section 4.8 and Chapter 9, Environmental Commitments.
25) ITD and FHWA fully commit to replacement of the lost functions and values of all affected wetlands per 33 CFR 325 and 332 as well as non-jurisdictional wetlands. Wetland mitigation is disclosed in Chapter 9, Environmental Commitments.

ITD would like to thank you for your comments and participation in the development of the FEIS.

Sincerely,

KENNETH G. HELM
District Transportation Planner, Senior

KGH:cty/

bcc: TPS2 EPS2 DE2

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

March 25, 2013

Mr. Kyle P. Holman
Federal Highway Administration
3050 Lakeharbor Lane, Suite 126
Boise, Idaho 83703

Mr. Ken Helm
Idaho Transportation Department
P.O. Box 837
Lewiston, Idaho 83501

Re: US 95 Thorncreek Road to Moscow Draft Environmental Impact Statement and Section 4(f) Evaluation (EPA Region 10 project number 03-084-FHW).

Dear Mr. Holman and Mr. Helm:

The U.S. Environmental Protection Agency has reviewed the US 95 Thorncreek Road to Moscow Draft Environmental Impact Statement. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate the opportunity to offer comment.

To improve safety and increase capacity on approximately 6.34 miles of US 95 from Thorncreek Road (MP 337.67) to the South Fork Palouse River Bridge (MP 344.00) in Latah County, Idaho, FHWA and ITD propose to replace the existing two-lane undivided highway with a four-lane divided highway with a 34-foot median. The No Action Alternative and three alignment alternatives are presented: a western, a central, and an eastern alignment. The western alignment, **W-4**, 6.69 miles long, would follow existing US 95, shift west for 2.91 miles and re-connect with existing US 95 south of Moscow. The central alignment, **C-3**, 5.94 miles long, would closely follow US 95, shift east on new alignment for 2.71 miles, and re-join existing US 95 to Moscow. The preferred alignment, **E-2**, 5.85 miles long, would follow existing US 95 to the top of Reisenauer Hill, shift east for 5.43 miles of new alignment, and reconnect with existing US 95 south of Moscow.

We acknowledge the need to address capacity and safety concerns on this segment of US-95, and appreciate FHWA and ITD's involvement of resource agencies during the early project development process. At that time (2004-2006), the EPA and other resource agencies shared serious concerns and provided guidance regarding project alternatives, particularly with respect to Alternative E-2, the eastern alignment. In response, ITD and FHWA provided additional analyses and technical reports. This was a commendable effort in that it addressed a variety of topics raised by agencies and the public, engaged many subject experts, and employed innovative methods, such as the Delphi process, to inform decision making.

While we appreciate the array of technical reports, and the infusion of public and agency comments, it appears that the information has not altered the proposed alignment of the project (Alternative E-2). We continue to have serious concerns regarding the preferred alignment, due to anticipated significant environmental degradation of aquatic resources, and Palouse prairie habitat and species that could be corrected by project modification or selection of another alternative. Also, there is a need to address wildlife habitat connectivity/roadway permeability and the safety issue it represents.

Accordingly, we are rating the DEIS as EO-2, Environmental Objections, Insufficient Information. An explanation of the EPA rating system is enclosed with this letter. Our main issues and information needs include the following:

- Within a landscape/project area where approximately only 3% of historic aquatic resources and their associated ecological functions remain, and where less than 1% of historic grassland wetlands remain:
    - The DEIS provides no Clean Water Act Section 404(b)(1) analysis and, therefore, no basis to support Alternative E-2 as the Least Environmentally Damaging Practicable Alternative.
    - The DEIS does not demonstrate that proposed discharges would not have an unacceptable adverse impact either individually or cumulatively on the affected ecosystem.
    - The DEIS lacks information to determine whether or not all available means to avoid and minimize impacts to aquatic resources have been applied.
    - No compensatory mitigation plan for aquatic resources impacts is provided.

- Within a landscape/project area where approximately only 1% of historic Palouse prairie, a critically endangered ecosystem, remains:
    - The DEIS and the preferred alternative, E-2, do not emphasize Context Sensitive Solutions, which are needed throughout project development, siting, design, construction, and long-term maintenance, for this unique and vulnerable ecological and community setting.
    - The preferred alternative, E-2, poses the greatest potential impacts and ecological risks to Palouse prairie remnants, particularly to Paradise Ridge, the largest remaining remnant in Latah County.
    - The DEIS does not acknowledge or analyze the potential cumulative effects to Palouse prairie habitat and species within the project area, Latah County, or the region if project area remnants are lost to weed invasion.

- Within a landscape/project area where 89% of the Ponderosa pine communities have been lost[1]:
    - The preferred alternative, E-2, would eliminate approximately 4 acres of Ponderosa pine woodland, which would be avoided by other proposed alternatives; and

[1] IDFG Terrestrial Wildlife Impact Assessment for US 95, Top of Reisenauer Hill to Moscow

- This incremental loss would contribute to local, regional, and cumulative effects upon species in decline that are associated with Ponderosa pine communities, including but not limited to pygmy nuthatch, long-eared myotis, and northern alligator lizard.

- Neither the preferred alternative, E-2, which would affect the highest value habitat and have the highest risk of wildlife-vehicular collisions, nor the other proposed alternatives include sufficient provisions for ecological connectivity/roadway permeability to (1) enable safe passage and dispersal for ungulates (moose, elk, deer), and other species; and (2) provide potential for connecting restored habitats and facilitating species' migration/adaptation to climate change.
- Proposed mitigation to address impacts, particularly those affecting aquatic resources, Palouse prairie remnants, and wildlife, appear insufficient to address the proposed project's direct, indirect, and cumulative effects; implementation and effectiveness monitoring are not discussed.
- The EIS needs further analysis and disclosure of potential ground water impacts.

Our enclosed detailed comments provide more discussion of these points. We thank you for this opportunity to offer comments, and would welcome further opportunities to collaborate with FHWA and ITD on the US-95 Thorncreek Road to Moscow project. If you have questions or would like to discuss these comments, please contact me at (206)553- 2601 or at carnahan.linda@epa.gov, or Teena Reichgott at (206)553-1601 or at reichgott.christine@epa.gov.

Sincerely,

Linda Anderson-Carnahan

Linda Anderson-Carnahan, Acting Director
Office of Ecosystems, Tribal and Public Affairs

Enclosures

U.S. Environmental Protection Agency
Detailed comments on
US-95 Thorncreek Road to Moscow Draft EIS

Preferred Alternative – Need for Context Sensitive Solutions[2]

We understand that the stimulus for this EIS was a legal challenge focusing on the endangered Palouse prairie habitat. Given this level of concern, we believe that a Context Sensitive Solution is essential for a successful outcome for the US-95 Thorncreek Road to Moscow project[3]. ITD and FHWA have taken steps to involve agencies, gather public comment, and produce an array of technical reports to inform the NEPA process. We commend ITD and FHWA for these efforts. However, it appears that the information has not altered the proposed alignment of the project.

Alternative E-2 is preferred by ITD and FHWA primarily for safety reasons (Helm and Holman, pers. comm.). While we understand and appreciate efforts to maximize safety, we note that all three proposed alternatives would meet safety needs described in the EIS. However, the preferred Alternative, E-2, would do so at the expense of many other social, cultural, and ecological needs and priorities. A context sensitive solution would balance these needs, resulting in an outcome that would meet the purpose and need for increased capacity and safety plus:

(1) avoid and minimize direct, indirect, and cumulative impacts and risks to rare, sensitive, and ecologically valuable habitats and ecosystem services;
(2) protect the scenic, natural, and cultural values of the community;
(3) minimize farmland losses; and
(4) provide sufficient ecological connectivity to prevent wildlife-vehicular collisions, facilitate ecosystem restoration, and support adaptation to climate change.

Of the three proposed alternatives in the Draft EIS, Alternative E-2 appears to be least suitable to meet these needs.

Recommendation: Reconsider the selection of a preferred alternative by pursuing the qualities and applying the principles[4] of Context Sensitive Solutions. We believe the required Clean Water Act Section 404(b)(1) analysis can be integrated with and will assist this effort (see comments below).

Aquatic Resources Effects

Clean Water Act Section 404(b)(1) analysis. All three action alternatives described in the DEIS include the proposal to discharge fill material to wetlands and waters of the United States in the Thorn Creek drainage or the South Fork of the Palouse River drainage. Based on the information provided in the DEIS, we believe that this proposed project does not comply with the Clean Water Act Section 404(b)(1) Guidelines for the following reasons:

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[2] Context Sensitive Solutions – principles and qualities: http://contextsensitivesolutions.org/content/topics/what_is_css/core-principles/

[3] EPA scoping letter, March 8, 2004

[4] http://www.vtpi.org/tdm/tdm57.htm CSS Principle #1: Balance safety, mobility, community, and environmental goals in all projects.

- *Considering the 303(d) listed streams and diminished aquatic functions within the project landscape and watershed, the DEIS does not demonstrate that proposed discharges would not have an unacceptable adverse impact either individually or cumulatively on the affected ecosystem* (40 CFR 230.1(c)).
The DEIS (p. 214) states that 97% of Palouse wetlands have been lost to agriculture and less than 1% of historic grassland wetlands remain. The associated ecological functions have been similarly reduced: the South Fork Palouse River basin streams are water quality impaired for sediment, nutrients, temperature, and bacteria; habitat alteration has caused intensified peak flows, high erosion, incised banks, sedimentation, and dropped water tables (p. 86). For all alternatives, the proposed project would further degrade aquatic resources in the project area (p. 153) with wetland fills, increased numbers of tributary crossings and lengthening of culverts, roadway encroachment, vegetation removal, increased impervious surface and runoff, and increased erosion and sedimentation. The approved South Fork Palouse River Total Maximum Daily Loads (TMDLs) for bacteria, nutrients, sediment, and temperature recommend riparian area restoration and stream buffer zones that would reduce temperatures and filter nutrients, sediment, and bacteria from direct delivery to the river.

  Recommendation: In the Final EIS, demonstrate that the proposed project would not exacerbate impaired waters and disclose how the project would comply with TMDLs.

Because aquatic resources and their associated functions and values are seriously diminished in the project area, we are concerned that Alternative E-2 would also impact headwater streams draining Paradise Ridge, which retain a higher level of integrity and function in the project area. Streams, headwaters, ephemeral and intermittent streams provide many upstream and downstream benefits. They protect against floods, filter pollutants, recycle nutrients, and provide food and habitat for fish and other biota. They also serve to maintain the quality and quantity of drinking water, maintain stream base flows, and recharge groundwater.[5] The DEIS does not address the need for avoidance of these impacts or discuss the consequences of additional impacts to existing higher functioning resources.

Recommendation: In the Final EIS, discuss how additional impacts to higher functioning stream and riparian resources would be avoided.

- *Based solely on impacts to aquatic resources, the DEIS does not provide sufficient information to determine the least environmentally damaging practicable alternative (LEDPA).*
The DEIS (p. 154) states that "The E-2 Alternative would avoid effects to the greatest extent." However, other than the number of stream crossings, linear feet of affected streams, and acres of wetland fill for each alternative, which are insufficient to make a determination, there is no supportive analysis. The EIS needs to include a 404(b)(1) analysis that demonstrates that all practicable means have been exhausted to avoid and minimize harm to aquatic resources. For example, full span bridging of wetlands or headwater streams, or minimizing fills by shortening approaches to bridges, or eliminated stream encroachments may be feasible. While this project would re-build existing highway sections, impacts are presumed to be lower where an existing

[5] US EPA on Rivers and Streams, http://water.epa.gov/type/rsl/streams.cfm

road already impacts aquatic resources. Alternatives C-3 and W-4 use the existing corridor more than E-2. Streams recover relatively quickly from impacts, even if those impacts are permanent, e.g., moving a channel. Effects on wetlands generally are permanent, and require replacement of the resource, a difficult and lengthy process. More information regarding stream encroachments for each alternative is needed to determine the potential for avoiding or minimizing these stream impacts to the maximum extent practicable in accordance with the Guidelines.

- *Although the DEIS states that Alternative E-2 would avoid effects to the greatest extent, it does not consider other significant adverse environmental consequences, such as impacts to critically endangered Palouse prairie habitat* (40 CFR 230.10(a)).
  NEPA (Section 102(B)) and the Guidelines at 40 CFR 230.10(a) are intended to ensure that environmental factors receive sufficient consideration in decision making. Specifically, 40 CFR 230.10(a) states, "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences" (underline added). Therefore, we believe that impacts to Palouse prairie habitat and species that would result from the various alternatives, and particularly from Alternative E-2, should be considered in the LEDPA determination. These impacts are discussed in our comments below.

  Recommendations:
  - ITD and FHWA should work with the EPA, USFWS, IDFG, and the Corps to determine whether there are additional means to avoid and minimize impacts on the various alignments.
  - Prepare a thorough 404(b)(1) analysis, which includes consideration of impacts to Palouse prairie habitat and species, as well as to Ponderosa Pine habitat, and to community culture and values associated with Paradise Ridge and its biotic community. Involve resource agencies in the process, and include the analysis in the Final EIS.
  - Correct the inconsistencies in the EIS with respect to wetland impacts for Alternative E-2 (p. 13: 3.61 acres; p. 155: 3.23 acres).

Compensatory Mitigation Plan. For unavoidable impacts to aquatic resources, the EIS should include a discussion of all mitigation options, including on-site mitigation, and provide a draft mitigation plan. A draft mitigation plan is needed to disclose for the public and the decision maker the relative adequacy, suitability, and feasibility of proposed mitigation, and to determine the likelihood that the plan can and will be implemented. We are concerned that, other than mentioning the possible use of credits from the existing Cow Creek mitigation site, the DEIS provides no mitigation plan.

Recommendation: In the Final EIS, provide a detailed compensatory mitigation plan, which includes the following information:
- A description of the resource type and amount that will be provided, the method of compensation, and the manner in which the resource functions of the compensatory mitigation project would address the needs within the Palouse bioregion and project area.
- A description of the factors considered during the compensatory mitigation project site selection process.

- A description of ecological performance standards that will be used to assess whether the project is achieving its objectives.
- A description of parameters to be monitored in order to determine if the compensatory mitigation project is on track to meet performance standards and if adaptive management is needed.
- Descriptions of the long-term management plan, adaptive management plan, and financial assurances.

Effects to Palouse Prairie Habitat, Rare and Threatened Plant Species

Due to its conversion to agricultural lands, only about 1% of Palouse prairie habitat, a critically endangered ecosystem, remains today[6] – all as remnant patches within a matrix of agricultural and other human land uses. Alternative E-2 runs closer than any other alternative along the base and lower hillside of Paradise Ridge, the largest remaining remnant of Palouse prairie in Latah County. E-2 is also proximate to the greatest number of other known prairie remnants in the project area; of the 32 remnants inventoried in 2005, 24 are located near Alignment E-2 (p. 206).

As indicated above, the 404(b)(1) Guidelines direct that, in addition to aquatic ecosystem impacts, the LEDPA determination must address whether or not other significant adverse environmental consequences would occur when considering alternatives. While the DEIS states (p. 45) that within the eastern corridor the E-2 Alternative "...was the only alternative to not affect rare plant communities,[7]" the Noxious and Invasive Weeds technical report by Lass and Prather (2007) clearly indicates that such impacts would occur with selection of Alternative E-2.

The proximity of the E-2 Alignment to Paradise Ridge and to other prairie remnants is significant due to weed invasion that would result from ground disturbance during construction, maintenance, and the continuous transport of weed seeds from vehicular use of the roadway. The report states that "Areas within 0.6 miles of the highway are at greatest risk to invasion", that "Areas extending east of the road may have a slightly elevated risk of invasion by wind dispersed weed species beyond 0.6 miles", and that "More Palouse Prairie is affected by the eastern [E-2] alignment." From Alignment E-2, this dispersion distance for weed seeds would extend to the summit of Paradise Ridge and beyond. Conservation and recovery areas for *Silene spaldingii* (ESA threatened plant species), other federally funded and community rare plant restoration areas, and Conservation Reserve Program lands are also concentrated on Paradise Ridge.

Well-funded, long term monitoring and management measures would be needed to prevent and control weed invasions to protect endangered Palouse prairie habitat and species from project-induced weed invasion if Alternative E-2 is selected. While ITD proposes (p. 231) to develop and implement a weed inventory, control plan and a seed mix to compete against weed establishment for any of the three proposed alternatives, it is unclear whether the level of commitment would be sufficient to protect rare habitat.

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[6] Noss, LaRoe, and Scott. 1995. Endangered ecosystems of the United States: A preliminary assessment of loss and degradation. USDI National Biological Service Biological Report 28.

[7] This statement needs to be corrected in the Final EIS.

Recommendations:

- Modify discussions in the Final EIS to improve disclosure and incorporation of these findings from the Noxious and Invasive Weeds Technical Report (Lass and Prather, 2007).
- In accordance with Executive Order 13112, for any chosen alignment, develop and commit to implementation of a detailed mitigation plan for effectively preventing and controlling the infestation and spread of weeds during project construction, maintenance, and long term operation. Disclose the extent to which the prevention and control measures may need to be intensified with Alternative E-2 and any additional long-term costs associated with implementation. Discuss ITD's level of commitment to implementing an intensified, long-term weed control program.
- Develop the mitigation plan in consultation with resource agencies and weed experts. Obtain their approval of the final plan.
- Consider selection of another alternative that would minimize project-induced weed invasion of Paradise Ridge and other Palouse prairie habitats.
- Analyze the cumulative effects to the remaining Palouse prairie ecosystem if remnant patches affected by the proposed project are lost to weed invasion.

Wildlife and Habitat

Because Alternative E-2 is located within and nearest the highest quality wildlife habitat in the project area, we are concerned that this alternative would also result in the greatest impacts to wildlife and wildlife habitat in the project area. Habitats that are in shortest supply and/or exist nowhere else in the project area are found on Paradise Ridge. These include:

- Palouse prairie – the largest, most intact, ecologically diverse and connected habitat;
- Native/rare plant conservation and restoration sites;
- Conservation Reserve Program lands;
- Ponderosa pine stands, which are inhabited by pygmy nuthatch, listed as critically imperiled by IDFG, provide habitat for long eared myotis, northern alligator lizard, and a host of other species;
- Palustrine scrub shrub wetlands – the wetlands of highest ecological value in the project area; and
- Shrub-vegetated riparian draws, which provide wildlife cover, forage, and movement corridors on the slopes of Paradise Ridge.

Impacts to project area wildlife and habitat would be direct, indirect, and cumulative in nature, including habitat loss, degradation, and fragmentation; noise and other disturbance from human presence and activities; mortality from wildlife-vehicular collisions and other interactions with humans; diminished and degraded water resources; and induced development. Impacts to ecological connectivity would result from any of the action alternatives, but would be most severe with Alternative E-2. These impacts could be minimized by choosing another alternative. We discuss this issue in more detail below.

Ecological Connectivity. Impacts to ecological connectivity that notably affect wildlife include: habitat fragmentation and associated edge effects; reduced access to food, cover, and social interactions; barrier effects/disruption of movement corridors and migration routes; and increased risk of wildlife-vehicular collisions and mortality. A factor essential to meet needs of both safety and ecological connectivity is

providing safe passage for all wildlife species that use the project area, including ungulates (moose, elk, and deer). This is true for all alternatives under consideration, but especially for Alternative E-2.

We commend FHWA and ITD for the mitigation commitment in the DEIS to provide adequate width for passage of small terrestrial wildlife at stream culverts and riparian areas (p. 231). We are also encouraged to learn (Helm, pers. comm.) that ITD is working with a contract wildlife biologist to design passage suitable for larger mammals at Eid Road overpass. However, many wildlife species, including moose and elk, avoid human activities and contact. We would like to know more about this effort and how a county road overpass would serve as a viable wildlife crossing. There are many resources available as guidance for the siting and design of wildlife crossings. Among them are:

- ICOET Proceedings: http://www.icoet.net/links.asp
- Wildlife Crossings Toolkit: http://www.fs.fed.us/wildlifecrossings/
- Safe Passage: http://www.wildlifeconsultingresources.com/pdf/Carnivore%20Safe%20PassageFinalSMALL.pdf

> *Recommendation:* Provide wildlife crossing structures of suitable number, design, and location, with appropriate fencing to guide species to crossing locations, in order to: improve roadway safety by preventing wildlife-vehicular collisions; re-connect restored habitats; facilitate wildlife migration/adaptation to climate change; and enable safe passage of all (both low and high mobility) wildlife species that are known or are likely to reside in or pass through the project area.

Safety Effects. In the DEIS, Alternative E-2 is preferred because, based on the DEIS safety analysis, it is projected to be the safest of the three proposed alternatives. Yet all three alignments are proposed as viable solutions, which would fully meet AASHTO standards and the purpose and need for increasing capacity and safety. The DEIS states (p. 204) that "...the travel times and safety between Action Alternatives does not differ substantially." Only Alternative E-2 would pose a wide array of environmental impacts, many unique to this project area and community, which could largely be avoided through the selection of another alternative.

We reviewed the safety analysis in the DEIS and in the Safety Technical Report and have the following concerns regarding its content and conclusions:

- The Climate and Wildlife Safety Analysis, Appendix E of the Safety Technical Report, states (p. 7) that "...the Eastern alignment (E-2) would rank lowest in motorist safety due to its proximity to year-round habitat on Paradise Ridge." The numbers of wildlife-vehicular accidents that have occurred on existing US-95 are then dismissed as insignificant, with no accounting for the increased risk of wildlife-vehicular collisions on Alignment E-2. No proration variable for wildlife-caused accidents are included in the safety calculations for any alternative. The only proration variable used, which serves as the principle basis for the safety projections, is an estimate of Total Turning Movements for the number and type of access points for each alternative alignment.
- The number of wildlife-vehicular collisions (37) recorded for 2002-2011 on the existing US-95 roadway, which is located at greater distance than E-2 from the higher value habitat of Paradise Ridge, was higher than the number of head-on (8) and intersection-related (22) collisions

combined. By moving the roadway within and near the area of higher habitat quality and wildlife usage in the project area, and by substantially widening, straightening, and increasing vehicular speeds on the roadway, the number and severity of wildlife-vehicle collisions are likely to increase. Consider, for example (DEIS p. 171) that "E-2 would be aligned between an existing man-made farm pond that may be used by wildlife, and Paradise Ridge. E-2 could affect the movement of moose and elk that currently travel between the pond and Paradise Ridge."

- The proposed means to mitigate wildlife-vehicular collisions, wider clearance and greater sight distance, would have reduced effectiveness at dusk, dawn, and during the night when many wildlife species are most active. Inclement weather, which based on collision data, weather analysis, and public comment is a frequent occurrence and a prominent safety issue in the project area, would further reduce the effectiveness. Of 274 crashes from 2002-2011, 128 (47%) were due to inclement weather or road conditions (p. 112).[8]
- The portion of existing US-95 alignment that is not used for the proposed project would become County roadway and would continue to be used for local circulation. The amount of existing US-95 that would become County roadway differs with each Alternative. E-2 would result in the greatest amount; C-3 the least. The collisions projected for the remaining segment of existing US-95 that would result from each alternative should be combined with the new roadway estimate to show the cumulative safety outcome.
- The extent to which local traffic would use existing US-95 rather than the new alignment, thereby reducing average daily traffic on the new alignment, would differ for each alternative. Yet the same ADT (6150) is used in each alternative's safety calculation.
- Alignment E-2 receives greater precipitation than the other two alignments.

> *Recommendation:* In the Final EIS, fully disclose the factors and methods used to evaluate safety for the proposed alternatives. Incorporate appropriate variables in the calculations to reflect the above factors in the safety analysis and report the revised results.

Land Use/Induced Development Effects. The Delphi panelists (Community Profile and Induced Development Technical Report) conclude that growth will occur in the area south of the Moscow city limits regardless of the alternative selected and that once a final alternative is chosen, the pace and intensity of growth will increase due to the alleviation of uncertainty regarding the alignment location (p. 44). In reference to Alternative W-4 they discuss the potential for added pressure to develop an intersection in a commercial manner (p. 45), which could apply to other alignments as well. We agree with the Panel's findings that, "There is no doubt that new roadway capacity might cause more development to occur", and that, "preventive strategies are key to mitigating impacts resulting from this transportation project" (p. 45). The best strategy to prevent impacts to critically endangered Palouse prairie habitat and species, to other high value habitats in the project area, and to the community values derived from them is avoidance.

Effects on Farmland and Conservation Reserve Program Lands. Alternative E-2 would affect the greatest number of acres of actively farmed land even after the CRP land is subtracted (p. 147), and the highest number of prime farmland acres (p. 145). It would also convert 43.5 acres of CRP land vs. 9 acres for the other alternatives. While CRP lands may potentially return to agriculture, these reserves

[8] There are data inconsistencies in the DEIS for total crashes (220 or 274), and for number of wildlife-vehicular collisions (37 or 31). The percentage of weather-related crashes is higher (58 %) if 220 is the correct total.

provide wildlife habitat, improve ecological connectivity, buffer aquatic areas and remnant prairie, control erosion, and improve water quality. These ecological functions and values would be diminished to the greatest extent with Alternative E-2.

> *Recommendation:* In the Final EIS, disclose the direct, indirect, and cumulative effects of further reducing these ecosystem services, which would result from Alternative E-2.

Environmental Justice – Low Income/Minority Housing. Alternative E-2 is the only alignment that would displace a mobile home park (Benson Mobile Home Park). This impact should be avoided because:

- The largest percentage of minorities occurs near the Hidden Village and Benson Mobile Home Parks (Community Impact Assessment Update, p. 7).
- There are currently no known plans for future affordable housing projects in the corridor and none have been identified in the City or the County since 2005 (Community Impact Assessment Update, p.10).
- The population below the poverty level in Latah County has increased from 17% to 23%, i.e., by 6.2% (Induced Development Update).
- The percentage of low income families within the project area has decreased by 2-3%, which coincides with a decrease in the number of families living in the area (Environmental Justice Update, p. 8).
- Many of the rentals (used as a low income indicator) in the project area are located in the general vicinity of mobile home parks (Environmental Justice Update, p. 8).

Based on the data provided, there is clearly a shortage of low income housing in the project area and an increasing need for it.

> *Recommendation:* Avoid impacts to the existing mobile home parks/low income housing.

Ground Water

The DEIS (p. 93) indicates that there are two basalt aquifer systems that supply drinking water in the project area. The deeper Grande Ronde aquifer, which is used as a municipal supply, has been declining at a rate of one to two feet per year in some areas indicating little recharge. The shallow Wanapum aquifer is a primary source for rural residents, particularly in the eastern corridor area. This aquifer is recharged from precipitation and infiltration from the surface. In discussing the project effects on groundwater (p. 160) the DEIS states that Alternative E-2 is the only alignment that would impact domestic wells (2 wells).

We are concerned that the DEIS does not also address how the new proposed roadway alignments would directly, indirectly, and cumulatively affect surface and subsurface water movement, infiltration, ground water quality, and ground water quantity. An analysis of effects upon surface infiltration and aquifer recharge, particularly in the eastern corridor where it is most needed for domestic water supplies, is important to the analysis of effects. The EIS should also analyze how and to what extent surface and subsurface lateral and vertical water movement would be affected by the roadway, the effects on the local water tables, and on the quality and quantity of water in local wells.

Recommendation: Provide the above information in the Final EIS.

Visual, Noise, and Other Community Effects

Visual. The DEIS states that Alignment E-2 would affect recreational viewpoints from Paradise Ridge, which is a popular location for hiking and bicycling, and from the University of Idaho Golf Course (p. 181). For Alternative E-2, 25% of the alignment would result in a high level of visual impacts, and 25% at a moderate high level--the highest percentages of any alternative (Table 55, p. 180). Road cuts and fills would also be more extensive with Alternative E-2 with the highest cut and fill heights of any alternative: 128 ft maximum cut height; 83 ft maximum fill height (Environmental Justice Report, p. 9). Because Paradise Ridge is a prominent community landmark, it is a visually sensitive area in all directions whether one is looking to or from it. Any development that is induced by the siting of E-2 would also impose visual impacts.

Recommendation: Use this information to help derive a context sensitive solution.

Noise. Evaluating noise impacts to human receptors, the DEIS indicates (p. 182) that Alternative W-4 would have no noise impacts, C-3 would have one impact, but the occupants would be displaced, and E-2 would have 7 noise impacts, 5 of which would be displaced. While this is good information, it is also important to evaluate noise impacts on wildlife, and on recreation activities, the enjoyment of which may be diminished by noise from roadway traffic. In their book, *Road Ecology: Science and Solutions*[9], Forman et al. state that "the open nature of farmland means that noise effects from highways extend a long distance, from hundreds of meters to over a kilometer," and that "highways in farmland may form significant avoidance zones and barriers to animal movement."

Recommendation: Use this information to inform a context sensitive solution.

Other community aspects important to context sensitive decision making are that:

- Alternative C-3 is viewed as most consistent with Moscow's land use goals (p. 143); and that
- Paradise Ridge, with its rich natural and cultural heritage, is considered a local landmark and source of community identity. It is frequented for recreation, exploration, learning and discovery and, based on the sustained and growing efforts toward Prairie protection and restoration, is clearly an object of their affection and long-term commitment.

Recommendation: Please factor this information into decision making.

Project Construction

The DEIS (p. 224) states that "Staging areas, stockpile sites and waste sites would be determined by the contractor. Waste sites and haul roads may be off site but would be approved by ITD." Due to the sensitive resources in the project area, particularly rare plants that may not be apparent at all seasons, and the need to minimize ground disturbance, the staging, stockpile, waste sites, and haul roads must be carefully located. Material source sites and the quantity of materials (cubic yards) also need to be identified.

[9] Richard T.T. Forman, et al. Road ecology: science and solutions, 2003.

Recommendation: ITD and contractors should work with appropriate resource agencies to identify suitable staging, stockpile, and waste sites and haul road locations. All sites should be approved by ITD in consultation with resource agencies. Identify the material source sites and the quantity of materials to be extracted, transported, and stored.

Monitoring and Adaptive Management

Monitoring is important to assess the accuracy of predictions of effects and to ensure the success of mitigation efforts. In addition, monitoring provides the means to identify the need for modifying (increasing or decreasing) mitigation. Adaptive management provides the flexible program for achieving these changes to mitigation. We recommend that the final EIS include a section that describes all of the proposed monitoring that would be necessary to implement the selected alternative, and any adaptive management strategies that would be used.

Additional EIS Information Needs and Corrections

Comparison of Alternatives. The Executive Summary of Alternatives' Benefits and Effects (Table 2, p. 13) includes no information regarding impacts to Palouse prairie habitat. The Executive Summary discussion states only that "The primary disadvantage of E-2 over the other alternatives is that it would be located closer to the base of Paradise Ridge and closer to moderate wildlife habitat." (p. 15)

Recommendation: In the Final EIS, include Palouse prairie and other vegetation impacts, such as, those affecting Ponderosa pine woodland, ESA threatened *Silene spaldingii* habitats and recovery areas, Prairie restoration sites, and CRP lands in the comparison and discussion of alternatives.

Mitigation. The environmental commitments listed on page 230 refer to a Memorandum of Understanding with IDFG that is being developed. We are unaware of this MOU and the DEIS provides no further information about it. IDFG (Hennekey, pers. comm.) indicates there have been discussions with ITD regarding mitigation, but no MOU exists.

Recommendation: In the Final EIS, provide a complete listing of, and specific information regarding any agreed to environmental commitments, including those made between ITD/FHWA and IDFG, and/or any other entities.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

US Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

RE: US-95 Thorncreek Road to Moscow L-28 DEIS comments

Dear Sir or Madam:

The Idaho Transportation Department (ITD) received your letter dated March 25, 2013 regarding the referenced project. We acknowledge your concerns regarding the E-2 Alternative and your detailed comments. We are providing the following as a follow-up to your concerns. The headers correspond to the bolded topic headers in your comment letter.

Preferred Alternative-Need for Context Sensitive Solution
As you noted in your letter, ITD and The Federal Highways Administration (FHWA) have taken steps to involve agencies, gather public comment and to conduct further studies. Based on the Revised Safety Analysis (ITD 2013) and in consideration of new information and the findings of the various technical studies and public input, ITD and FHWA maintain that the E-2 Alternative is FHWA's and ITD's Preferred Alternative. The E-2 Alternative is preferred and the alignment was not altered because it is designed and located to provide the greatest safety benefit which best meets the project purpose and need. However, additional mitigation measures have been added to the FEIS to address the E-2 Alternatives' impacts to natural resources. See FEIS Section 2.6 Preferred Alternative and Chapter 9, Environmental Commitments. The E-2 Alternative is predicted to have 46 fewer total crashes and 9 fewer fatal and injury related crashes in the 19-year design period compared to the C-3 Alternative. It is predicted to have 32 fewer total crashes and 16 fewer fatal and injury related crashes in the 19 year design period compared to the W-4 Alternative and 31 fewer total crashes and 15.5 fatal and injury crashes than the Modified W-4 Alternative. The differences in the human impacts are believed by ITD and FHWA to be a considerable difference and that the other impacts, with mitigation would not outweigh the benefits.

Context sensitive solutions that have been incorporated into the Preferred Alternative are described in the FEIS Chapter 9, Environmental Commitments. A few examples are listed below:

- Should the E-2 Alternative be selected, ITD will evaluate engineering solutions to reduce the impacts to the Palustrine scrub-shrub wetlands (Wetlands 13 and 32). This could involve steepening slopes to reduce wetland fill while still designing to meet safety standards. This change will be evaluated and designed during the preliminary design process when detailed geotechnical and survey detail is available.

- ITD will construct an undercrossing for Eid Road that will be designed to accommodate both vehicle traffic and wildlife, including ungulates, to cross under the highway. The crossing would have sloped sides with a natural surface. The animals would use the sloped side as well as the right of way adjacent to the highway. Fencing will be installed to direct wildlife to the crossing. All tributary crossings, including the crossings at Wetlands 13 and 32, which are scrub-shrub wetlands, will be designed to accommodate small terrestrial wildlife. Details of the crossing structures and fencing will be determined during preliminary and final design when detailed topographic and geotechnical information is available.

- US-95 will be an Expressway Access Control facility and no new non-agricultural accesses will be permitted on US-95 without ITD consent, which would minimize future private and commercial development. This will reduce the potential future impacts to resources including rare, sensitive and ecologically valuable habitats and ecosystems, scenic value, natural functions. This access control will also minimize future farmland impacts, and future impacts to wildlife habitat due to development. See the FEIS Section 2.4.2 and 4.10 for additional information regarding proposed future access. See Chapter 6.1 regarding indirect effects due to induced growth.

- ITD will work with farmers to construct farmable slopes. This will both minimize the amount of farmable land lost and reduce weed establishment and spread to sensitive areas.

- ITD's Vegetation Management Plan will be implemented as summarized in FEIS Section 4.8 and in Chapter 9, Environmental Commitments.

The Clean Water Act (CWA) Section 404(b)(1) analysis will be completed during the Section 404 permit process should an action alternative be selected. During the preliminary and final design process and coordination with the USACE, there will be ongoing efforts to further avoid, minimize, and mitigate potential adverse impacts to wetlands, waters of US, Palouse prairie and other natural as well as human resources through the use of engineering solutions. Section 4.6 under the heading Executive Order 11990 discusses avoidance, minimization and mitigation for wetland impacts.

Aquatic Resources Effects
Additional information demonstrating the alternatives' effects on 303(d) listed streams and compliance with TMDLs has been added to the FEIS Section 4.6 Wetlands and Tributaries and to FEIS Chapter 6, Indirect and Cumulative Effects.

ITD recognizes that the headwater streams that would be impacted by the E-2 Alterative provide a higher level of function compared to those further downstream. This is reflected through the higher wetland rating which considers three major categories of functions and values including water quality, hydrology and habitat. This is also stated in the DEIS Section 4.6.1. Compensatory Mitigation for the Loss of Aquatic Habitat [33 CFR Parts 325 and 332 and 40 CFR 230] and Executive Order 11990, Protection of Wetlands require that lost functions and values be replaced. Additional detail regarding mitigation including the avoidance, minimization and compensatory mitigation in order to replace the impacted wetland functions and values are described in the FEIS Section 4.6 and Chapter 9, Environmental Commitments.

ITD and FHWA will continue to work with EPA, USFWS, IDFG and the USACE during the design process to identify engineering solutions to minimize wetland impacts due to the selected alternative. Should an individual Section 404 permit be required, a 404(b)(1) analysis will be completed during the Section 404 permitting process. While a 404(b)(1) analysis will not be completed prior to the FEIS, additional information regarding the avoidance, minimization and compensatory mitigation is summarized in the FEIS Section 4.6, under Executive Order 11990 and Chapter 9, Environmental Commitments.

Regarding the inconsistency in E-2 wetland impacts, the tables that were referenced were both correct and added up to 3.61 acres of wetland impact by the E-2 Alternative; however, Table 2 continued on the next page (page 156) and your calculations may not have considered the entire table.

Compensatory Mitigation Plan
Compensatory mitigation for the Action Alternatives will be met by using credits from the Cow Creek Mitigation Area, which has already been successfully implemented. The USACE has already approved the site and it meets their mitigation requirements under Section 404; therefore a detailed

compensatory mitigation plan is not necessary. However, should an action alternative be selected and during design refinements it is determined that the wetland impacts would exceed what is stated in the FEIS, then additional mitigation may be pursued by purchasing mitigation bank credits. Wetland mitigation is summarized in the FEIS Section 4.6 under Executive Order 11990 and Chapter 9, Environmental Commitments.

Effects to Palouse Prairie Habitat, Rare and Threatened Plant Species

As stated in the DEIS, the E-2 Alternative is closer to Paradise Ridge and more Palouse remnants compared to the other alternatives but it would not "directly" affect Paradise Ridge, Palouse Prairie Habitat, rare and threatened plant species. The referenced statement on page 45 has been clarified to refer to direct effects. The Noxious and Invasive Weeds technical report by Lass and Prather does indicate that the alternatives would have indirect effects due to weed dispersal which was disclosed in the DEIS Section 6.1 under Indirect Effects. Additional information from the Vegetation Technical Report has been incorporated into the body of the FEIS in sections 3.8, 4.8 and Section 6.1. Additional information regarding the cumulative effects to Palouse Prairie and vegetation has been added to Section 6.2, Cumulative Effects.

In recognition of the potential indirect effects due to weed dispersal and establishment, ITD and FHWA are committed to implementing ITD's Vegetation Management Plan andconsulting with USFWS regarding specific weed control measures to minimize impact to Palouse prairie and restoration sites. This may involve providing funding for long term management, maintenance and monitoring which will be determined during the right-of-way process. See the FEIS Chapter 9, Environmental Commitments.

Wildlife and Habitat

Ecological Connectivity

All the alternatives would accommodate wildlife crossing at county road under-crossings, including the E-2 Alternative. A general description of the wildlife crossing structures and other measures to accommodate wildlife movements is included in the FEIS Chapter 9, Environmental Commitments. Specific detail regarding the type, size and locations of each wildlife structure (bridge and culverts) is not available at this level of design. That detail will be provided during preliminary and final design when specific topographic and geotechnical information is available. If the E-2 Alternative is selected, impacted water features that would be replaced will be relocated on the east side of the roadway to reduce the movement of wildlife across the roadway.

Safety Effects

The crash predictions in the FEIS are based on calculations from the First Edition of the American Association of State Highway and Transportation Officials (AASHTO) Highway Safety Manual (HSM). The HSM provides the most current and accepted knowledge and practices relating to safety management according to AASHTO and Transportation Research Board Task Forces. FHWA and all 50 State Departments of Transportation have reviewed and accepted the HSMs methods for crash predictions. A better method of crash prediction does not exist.

The Safety Analysis was revised after the DEIS public comment period to address comments and to predict crashes for the entire 19-year design period. In order to make the safety predictions reported in the Safety Analysis and the FEIS for the 19-year design period, nearly 2000 pages of calculations were made on Microsoft Excel Spreadsheets shown in the Revised Safety Analysis (ITD, 2013), Appendix E. The spreadsheets were developed by Karen Dixon, PhD, of Oregon State University, one of the authors of the HSM. Pages 9 through 11 of the Safety Analysis (ITD, 2013) have more detail regarding the methods of calculations used by the HSM.

Facts as well as assumptions were used to predict crash data for Thorncreek Road to Moscow. The following facts are used in the Highway Safety Manual equations and support the prediction that E2 is safer than C3:

- The overall length of E-2 is less than C-3,
- The length of the suburban section in E-2 is shorter than the length of the suburban section of C-3. More accidents are predicted per mile in the suburban section than the rural section due to increased turning traffic, more access points, narrower separation between the northbound and southbound directions, and greater traffic volume,
- E-2 has fewer residential and commercial approaches than C-3,
- C-3 has five public road approaches and E-2 has two public road approaches.

The traffic predictions, their growth rates, Crash Modification Factors, and Calibration Factors are considered assumptions. Traffic predictions are included in the Revised Safety Analysis (ITD 2013) Appendix C and E. The Crash Modification Factors as well as the Calibration Factor are included in Revised Safety Analysis (ITD 2013) Appendix E. The Crash Modification Factors are widely accepted and published in the Highway Safety Manual and the Calibration Factor used is 1.0 for all alignments. All three proposed action alternatives use exactly the same Crash Modification Factors for each highway type. If the Crash Modification Factors are changed, the crash predictions on all three alignments will increase or decrease by about the same amount. Based on these findings, the E-2 Alternative is safer than the C-3 Alternative using prediction methods outlined in the AASHTO Highway Safety Manual.

Wild animal crash potential may be greater on E-2 based on findings in wildlife technical reports that there is more moderate quality ungulate habitat in the Eastern Corridor and due to the presence of a Low Priority Wildlife Linkage Areas for 1.98 miles of the E-2 Alternative's alignment; (Geodata 2008); however, sight distance for the E-2 Alternative would be greater than the C-3 and W-4 (and Modified W-4) alternatives due to its straighter roadway geometry. The greater sight distance on E-2 may offset the wild animal crash potential. The frequency of wild animal crashes is difficult to predict; however, the severity of wild animal crashes is observed to be very low compared to other crash types. Even if more wild animal crashes were predicted on the E-2 Alternative, they would not offset the safety benefits of the other alternatives due to their low severity. The safety benefit can be quantified using FHWA's calculated economic cost of crashes for different crash types.

Roadside clearing is predicted to greatly reduce wild animal crash potential on all action alternatives, because brush and vegetation where wild animals can hide would be removed near the highway. It would also improve driver reaction time. The roadside clearing technique has been found to reduce wild animal crashes from 50 – 90 percent.

This has been demonstrated through similar improvements from in other sections of US-95 and on US-20 between MP 369 and MP 375 where similar improvements reduced the wild animal crashes by 90 percent (ITD 2013). More detailed information regarding wild animal crashes is in the Revised Safety Analysis (ITD 2013).

The Revised Safety Analysis (ITD 2013) considers the safety of the sections of US-95 that would be transferred to the North Latah Highway District. Based on the revised analysis, the E-2 Alternative is predicted to have 46 fewer total crashes and 9 fewer fatal and injury related crashes in the 19 year design period than the C-3 Alternative. It is predicted to have 32 fewer total crashes and 16 fewer fatal and injury related crashes in the 19 year design period than the W-4 Alternative and would have 31 fewer total crashes and 15.5 fewer fatal and injury crashes than the Modified W-4 Alternative.

The difference in the human impacts is believed by ITD and FHWA to be a substantial gain, which is not offset by the other environmental impacts, with mitigation.

Regarding weather related safety, while weather, including precipitation, is an important contributing factor to driver safety, the highway alignment characteristics govern the spatial distribution of weather-related vehicle accident potential. The concentrations of weather-related accidents are attributable to tight radii curves on steep slopes, and are independent of the relative

elevation, snow accumulation, precipitation, or fog within the highway section. The improved typical sections for each of the alternatives would mitigate in weather related safety but would be influenced by factors such as slope orientation, steepness of grade, curvature, and the location of decent. All action alternatives would improve the highway to meet AASHTO standards and would therefore be safe. See the FEIS Section 3.10 and 4.10 and the Revised Weather Analysis (Qualls 2013) for additional information.

Land Use/Induced Development Effects
All of the action alternatives would result in induced growth south of the City of Moscow. This is an area that is already experiencing development. All of the action alternatives would be limited access facilities that would restrict any new accesses and reduce the induced growth and potential indirect and cumulative effects due to residential or commercial growth. The E-2 Alternative is anticipated to have the fewest accesses of any of the action alternatives.

Effects on Farmland and Conservation Reserve Program Lands
The CRP land being affected functions for erosion control and provides moderate wildlife habitat for grassland birds and ungulates. While there may be impacts to CRP lands, these impacts will not result in a long-term degradation of ecological functions. The CRP contracts have or will soon expire and the land would be replanted, most probably, in wheat. Additional information regarding the ecosystem services of farmland including CRP land is included in the FEIS Sections 3.8 and 4.8. CRP land is also discussed in the FEIS Section 3.3 and 4.3.

Environmental Justice-Low Income/Minority Housing
As disclosed in the DEIS, the E-2 Alternative will impact the Benson Mobile Home Park, which is not considered an environmental justice community (low-income or minority populations). It does have some minority residents and provides a source of affordable housing but there are no distinguishable minority or low income populations. Avoidance by the E-2 Alternative was not possible because the homes are oriented all along Eid Road perpendicular to the alignment and it would affect some homes regardless of which way the alignment was shifted. There are no gaps between the houses that would be sufficient to accommodate the width of the alignment without impacting homes. The homes would be relocated according to the Uniform Relocation Act. The E-2 Alternative would disproportionately impact homes in the Benson Mobile Home Park but would not result in a disproportionate impact to low-income or minority populations because this is not considered minority or low income populations. The E-2 Alternative would provide the greatest safety benefit compared to the other alternatives and best meets the project purpose and need. See FEIS Section 4.1.

Groundwater
A Hydrogeologic Analysis Report has been prepared for the project (RHS 2014). Additional information from this report regarding the direct effects of the alternatives to surface and subsurface waters have been added to the FEIS Sections 3.6, 3.7, 4.6, and 4.7. Additional information regarding indirect and cumulative effects to surface and groundwater has been added to the FEIS Chapter 6, Indirect and Cumulative Effects.

Visual, Noise, and Other Community Effects
The project is currently being designed at a conceptual level of analysis. Should an action alternative be selected, ITD and FHWA will utilize specific geotechnical information and topographic survey data to more specifically design cuts and fills and look for opportunities to minimize the visual impacts of the project. ITD will also meet with landowners during the design process to find opportunities to minimize impacts to properties.

Mitigation measures to minimize impacts are proposed in the FEIS Chapter 9, Environmental Commitments.

Noise
Additional information on noise impacts on wildlife was added to FEIS Section 6.1.

In addition to the above considerations, ITD has considered the land use consistency of the C-3 Alternative and the natural and cultural heritage of Paradise Ridge. This can be exemplified throughout the DEIS and specifically in Chapter 9, Environmental Commitments.

Project Construction
Waste, material, staging and stockpile areas will be identified by the contractor and approved by ITD prior before construction activities begin. Sensitive areas that should be avoided will be identified in consultation with agencies and will be indicated on plan sheets to be retained and protected. Material sources will be commercial sites and therefore will be in compliance with applicable laws and regulations. It is anticipated that the staging, and stockpile sites would be within the existing road footprint. See Chapter 9, Environmental Commitments.

Monitoring and Adaptive Management
All monitoring and adaptive management commitments have been added to the FEIS Chapter 9.

Additional EIS Information needs and Corrections
Information regarding the indirect effects to Palouse prairie remnants, vegetation, and restoration sites has been expanded on in the FEIS Executive Summary as well as in Section 6.1. The reference to the IDFG MOU has been revised. Since the publication of the DEIS ITD and IDFG have come to an agreement on mitigation measures and decided that an MOU was unnecessary. These mitigation measures and additional environmental commitments have been added to the FEIS Chapter 9, Environmental Commitments.

ITD would like to thank you for your comments and participation in the development of the FEIS.

Sincerely,

KENNETH G. HELM
District Transportation Planner, Senior

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bcc: TPS2 EPS2 DE2

IDAHO DEPARTMENT OF FISH AND GAME
600 S. Walnut/P.O. Box 25
Boise, Idaho 83707

C.L. "Butch" Otter/Governor
Virgil Moore/Director

March 25, 2013

Mr. Adam Rush, Public Involvement Coordinator
ITD Office of Communications
3311 W. State Street
Boise, Idaho 83707
adam.rush@itd.idaho.gov

RE: Draft Environmental Impact Statement and Section 4(f) Evaluation US-95 Thorncreek Road to Moscow

Dear Mr. Adam Rush:

Idaho Department of Fish and Game (IDFG) has reviewed the Draft Environmental Impact Statement US-95 Thorncreek Road to Moscow (DEIS). Our comments and recommendations are offered not to support or oppose the proposal or its alternatives, but to provide a technical review of the DEIS and the potential effects to wildlife, fish and habitat.

Preferred Alternative:
Based on previous correspondence (letter from J. Carpenter, Feb. 27, 2013), we understand that Idaho Transportation Department (ITD) believes that the roadway footprint of the eastern alternative (E-2) will not directly affect any Palouse Prairie Remnants but the DEIS does acknowledge indirect effects of this alternative. If E-2 is chosen, i.e. avoidance of negative effects to this habitat is not possible, then sufficient mitigation actions should be considered. We continue to note that the Palouse Grassland Remnants/Palouse Prairie Remnants is an important, vanishing ecosystem relative to wildlife resources.

Mitigation MOU:
We note that Table 68, Mitigation Measures for Vegetation, Fish and Wildlife (P 230) states "ITD and IDFG will implement stipulations in the Memorandum of Understanding (MOU) which is currently being developed". Although ITD and IDFG have had discussions about a MOU to address mitigation for vegetation, fish, and wildlife effects of the Thorncreek project , we consider the discussions to be preliminary in nature and certainly not reflective of language in the DEIS that suggests that an MOU is currently in development. We find the current portrayal of our discussion in the DEIS to be pre-decisional and request that references to the development of an MOU between IDFG and Idaho Transportation Department (ITD) for mitigation of the US-95 Thorncreek project be removed from the EIS or amended to state that the agencies are in discussion about mitigation opportunities that could be expressed in a MOU. We believe this allows for continued technical and policy discussion between both agencies.

IDFG Wildlife Report:
IDFG prepared a general assessment of wildlife impacts for the US-95 Thorncreek project per ITD's request (IDFG, 2006, General Wildlife Assessment). The report is provided in the DEIS, Wildlife Technical Reports. The DEIS (*e.g.*, P 22, p 162, p 168) characterizes the IDFG report as a description of the effects of the alternatives on "*general wildlife species*," "*key indicator species*" and "*representative of species of greatest conservation need.*" This nomenclature is not an accurate description of the content or intent of the IDFG report. Because the IDFG report is referred to throughout the DEIS and is used to identify mitigations for wildlife, clarity is important.

The IDFG Wildlife Assessment did not attempt to identify or assess effects of the US-95 project to "*general wildlife species*", so this phrase in the DEIS is unclear. The IDFG Wildlife Assessment also did not identify or refer to any species as a "*key indicator species*" as the DEIS suggests so we suggest that this term be revised or removed relative to the IDFG report.

In its wildlife assessment, IDFG evaluated impacts of the project to Idaho Species of Greatest Conservation Need (SGCN) identified in the State Comprehensive Wildlife Conservation Strategy (IDFG, 2006). We limited our evaluation to SGCN first because those are species listed by the state as most at risk and, second, because we felt that effects to those species would compare with effects we would expect to other wildlife in the project area. We also felt that mitigations for impacts to the SGCN we identified would mitigate for effects to other wildlife in the project area.[1] After we eliminated from consideration any SGCN not expected to be found in the project area, we evaluated the potential effects of the project for all remaining SGCN listed for that area. IDFG did not identify any SGCN species or groups of species as "*representative species.*" We did, however, refer to those SGCN we evaluated as possible surrogates for effects to and mitigations needed for other wildlife species (See p 3 of the IDFG Wildlife Assessment).[2]

Wildlife Effects Analysis: General Comment
We are concerned that the DEIS does not appear to be formulated on the full array of technical information about wildlife provided to ITD. Conclusions seem to overemphasize technical information from the report by Sawyer (2010). The DEIS describes Sawyer's report as a summary of and an "independent assessment" of the wildlife reports provided to ITD from Melquist (2005, 2005b), Reudiger (2007), and IDFG (2006).[3] Sawyer describes his report as an "independent evaluation of the conclusions" of Melquist and Reudiger. However, Sawyer's report is not based solely on a summary and assessment of the previous reports; Sawyer also provides his own qualitative description of habitat in the project area. Based on his own habitat

[1] The IDFG Wildlife Assessment did not evaluate effects to large ungulates, pygmy nuthatch or Townsend's big ear bat because those species were addressed in separate reports prepared by Melquist (2005).

[2] The DEIS Environmental Consequences section changes what it calls a *"representative species"* list to include northern alligator lizard, pygmy nuthatch and long-eared myotis bat, species the DEIS selected to focus on in the effects analysis for undisclosed reasons. Northern alligator lizard, is a SGCN and is described in the IDFG wildlife report. No information is provided in the DEIS to indicate what other wildlife species ITD thinks those three species may represent as surrogates, nor does it describe how it was determined that those species are "representative." (See additional comments below titled Species Selectivity and elsewhere in this review.)

[3] Note Sawyer report's focus is almost entirely on big game, which IDFG did not address.

description and rankings, Sawyer contradicts recommendations for big game mitigations from Melquist and Ruediger. The DEIS's determinations about impacts to big game and mitigation for impacts to wildlife rely entirely on Sawyer's conclusions rather than objectively acknowledging that contrary information exists. We acknowledge that ITD must make decisions, regardless of whether the body of technical information represents consensus recommendations or not. However, when there is a broader body of information available, it strengthens the DEIS to represent it.

The wildlife reports and correspondence from Melquist, Ruediger, and IDFG each acknowledge the highly altered and relatively low to moderate quality big game habitat in the project area. All concluded that population-level effects were not likely to occur from any of the alternatives. However, all three assessments also recognized that E-2 would have negative effects to big game and other wildlife habitat, and all three identified potential big game passage structures and other mitigation actions to consider for effects from the E-2 corridor.

Sawyer's assessment of the habitat condition was similar to those of Melquist, Ruediger and IDFG, but his conclusions about effects to big game and appropriate mitigation for those impacts differed substantially. Sawyer discounted big game impacts in W-4 and C-3 and said no mitigations were merited for elk, moose or deer in those corridors. In contrast to Melquist and Ruediger, Sawyer also discounted impacts to elk and moose in E-2 and said no mitigation was warranted for those species in E-2, although he did acknowledge that "some level of mitigation may be justified (for deer)."

Provision of a clear rationale to refute or disregard recommendations regarding wildlife impacts and mitigations made by Melquist, Ruediger, and IDFG would substantially strengthen the DEIS as would providing a stronger rationale for the heavy reliance on recommendations from Sawyer.

Wildlife Effects Analysis: Indirect Impacts

The wildlife effects assessment in the DEIS is based on the footprint of the new highway; the DEIS does not assess the indirect impacts of the proposed action on wildlife and wildlife habitat. For example, the DEIS p. 166 says "(E-2) would not disturb forested habitat on Paradise Ridge but is closer to Paradise Ridge than other alternatives."[4] Disregarded are the wildlife reports by Ruediger, Melquist and IDFG, developed at ITD request and cited in the DEIS, each of which describe indirect effects of highways on wildlife that can extend more than a mile from the highway footprint.

Scientific literature does reflect that highway impacts on wildlife extend far beyond the actual footprint of the road. Both the Ruediger and IDFG wildlife reports provided numerous citations and a discussion about the range and severity of indirect impacts of highways on wildlife. IDFG's report recommended, with supporting citations, buffer zones for ITD to consider when assessing impacts of the proposed project on wildlife and for determining appropriate mitigations. Consideration of these assessments and citations would improve the DEIS as would including consideration of indirect impacts to wildlife. A number of scientific reports about

[4] This statement is also in contrast to a statement in the next paragraph which says "(E-2) would affect a forested habitat . . . " The E-2 corridor would go through a stand of ponderosa pine, requiring removal of a portion of that forest.

highway effects to wildlife have also been published since the reports in 2006 that could also be considered in the effects analysis.

Wildlife Effects Analysis: Species Selectivity
In several sections, including portions of the Environmental Consequences section, the DEIS compares wildlife impacts between alternatives using only three wildlife species: northern alligator lizard, pygmy nuthatch, and long-eared myotis bat. The rationale is unclear, given that technical reports to inform the DEIS provide information for a broader range of species, including the SGCN evaluated in the IDFG report and large ungulates evaluated by Melquist, Ruediger and Sawyer. A rationale or justification for this highly selective analysis is not provided in the DEIS.[5] We agree that the DEIS appropriately included analyses for these three species, but there was sufficient technical information to provide analysis for other species, as well. We are concerned that unless there is additional rationale for selecting these three species, the DEIS is not sufficiently comprehensive for analysis of alternatives and decision-making relative to effects to wildlife.

For example, the DEIS says that W-4 would not affect northern alligator lizard, pygmy nuthatch and long-eared myotis bat habitat associated with Ponderosa pine near the base of Paradise Ridge (p 54). That is because there is no suitable habitat for those species in W-4, which is not near Paradise Ridge. Northern alligator lizard, pygmy nuthatch and long-eared myotis bat are associated with a specific type of habitat (Ponderosa pine) that is not only rare in the area, but limited to the E-2 corridor; therefore, those three species are likely to be affected only if the E-2 alternative is selected. This species-selective approach discounts the many other wildlife species that could be affected by the project in alternatives W-4, and C-3. It also discounts the other wildlife species that construction of the E-2 corridor could affect in addition to alligator lizards, nuthatches, and long-eared myotis bat.

We are concerned that a species-selective approach to the analysis continues, in various forms, throughout the DEIS; the Summary of Resource Effects (Table 39) lists only large ungulates (deer, elk and moose), ignoring not only the SGCN species in IDFG's Wildlife Assessment, but also the three species the DEIS previously selected to focus on (northern alligator lizard, pygmy nuthatch and long-eared myotis bat). The Cumulative Effects section considers effects only to large ungulates and to unidentified "non-native, habitat generalist, common species," (p 212) thereby ignoring effects not only to SGCN but, again, the three species the DEIS previously selected to focus on. (See our additional comments under Cumulative Effects.). Inconsistent consideration of species and consideration of selected groupings of species relative to assessment of the alternatives does not demonstrate a systematic approach for the technical, economic, and environmental analyses.

Habitat:
IDFG does not agree with conclusions drawn on p 169 regarding "*Pine Stand Effects.*" The DEIS characterizes the loss of about 4 acres of a Ponderosa pine stand as "minor" because the stand is small, with ten snags and "only" four mature trees suitable for pygmy nuthatch nesting.

[5] See P 102, the DEIS says *"Two species were found to be of particular interest and could potentially occur in the project area based on agency and public comment . . . "* and describes the habitat of those species. A separate paragraph on P 103 describes habitat used by northern alligator lizard, but does not explain why that species was selected for emphasis.

Because Ponderosa pine stands are rare in the Palouse habitat in and adjacent to the project area, the loss of additional Ponderosa pine habitat is especially important because of its rarity. Ten snags and four mature pines can represent an important wildlife habitat (not just for pygmy nuthatch) in a region where similar habitat is severely limited. Younger Ponderosa pine forests are also important because they provide habitat for a host of other wildlife species, and eventually become mature pine forest.

Also, conclusions in the DEIS are based only on the direct loss of trees to make way for the highway footprint. The DEIS fails to identify whether there will also be indirect effects, or not, of the proposed development. The effects analysis must consider both direct and indirect impacts to be complete.

Cumulative Effects:
The cumulative effects section on p. 212 includes generalizations about wildlife such as the following: *"Many of the wildlife species that would occur in the project area are non-native species . . . general habitat specialists . . . and a variety of other common species. These species, while important locally, are mainly . . . adaptable to habitat modifications, fragmentation and high levels of human use."*
No citations are provided to support these statements. The DEIS should provide evidence that (name the species) are "*adaptable to habitat modifications, fragmentation and high levels of human use*" and, if so, to what degree.

At ITD's request, IDFG prepared a wildlife report that focused on Idaho Species of Greatest Conservation Need. IDFG suggested that, if the highway minimized and mitigated for impacts to Idaho's more imperiled wildlife in the project area, other wildlife would receive adequate protection as well. The information available in that report would be relevant to this DEIS, particularly in the cumulative impacts assessment. In their February 27, 2013 correspondence, ITD did recognize that there could be cumulative impacts to Palouse remnants due to this project combined with other unrelated development that continued to occur in the area, but outside of the ITD right-of-way. That circumstance does not alleviate the objective of cumulative effects analysis. In fact, example of cumulative effects situations faced by agencies such as the Federal Highway Administration includes cumulative commercial and residential development and highway construction associated with suburban sprawl, clearly assessing both agency actions and other actions affecting the same resource.

The EIS should assess the direct and indirect losses of habitat caused by the project, in conjunction with other foreseeable impacts in the area, and assess how those losses of habitat will affect SGCN and other wildlife.

<u>Elk, moose and deer:</u> The statement on p 212 that, *"Elk, moose and deer are more specific to habitat and human use patterns* (than the "*non-native . . . general habitat specialists . . . common species"* mentioned previously in this section of the DEIS) is confusing and misleading, not only because it fails to provide a clear, scientifically supported comparison between the habitat needs of large ungulates and other species, but also because it fails to identify the other species to which these animals are being compared to. Many common or non-native wildlife species have more (or less) specific habitat needs than do elk, moose and deer. The DEIS must differentiate

on a species-to-species basis and provide scientifically sound evidence from which to draw conclusions.

IDFG does not understand the statement that elk, moose and deer " . . . *are more specific to . . . human use patterns*". The DEIS should clarify this statement.

Wildlife Collisions:
Based on emphasis in the DEIS, it is clear that ITD finds that wildlife collisions are important to consider and we agree. The DEIS should fully evaluate the potential for an increased number of wildlife collisions in all of the alternatives. Wildlife-vehicle collisions cause loss of wildlife but, more importantly, carry human safety and property damage concerns. We are aware that ITD has recently entered into a research contract to assess methodology for prioritizing appropriate mitigation to reduce big game animal-vehicle collisions on Idaho highways. We encourage the continued use of the current wildlife linkage database along with new information forthcoming from this study for decision-making.

The DEIS (p 114) discounts wildlife collisions as a (safety) factor in the evaluation of alignment alternatives because, according to the DEIS, none of the collisions between 2002 -2011 involved injuries and because of the "randomness" of those collisions, which is not defined by any criteria. However, we note in Table 30 that the number of wildlife[6] collisions in the existing US-95 corridor from 2002 to 2011 (N=31) were about equal to the number of intersection-related accidents and head-on collisions combined (N=30).[7]

All of the wildlife assessment reports (Melquist, Ruediger, IDFG and Sawyer) concur that moving to the E-2 alignment is likely to have the highest risk of wildlife collisions of the three alternatives considered because of proximity to the best habitat. What is not acknowledged or discussed in the DEIS is that the likelihood of wildlife collisions also increases as speed limits are increased and as the footprint of the highway is expanded. Also to be considered is that wildlife mortalities on the new highway will be additive to mortalities experienced on the existing route, regardless of alternative chosen, since the existing road will remain open as a county highway after the new US-95 route is completed. The DEIS should consider each of these factors.

The number of wildlife collisions reported in the DEIS and our comments are better described as "big game" collisions because neither the DEIS nor our previous comments have addressed vehicle collisions with other wildlife. Quantifying highway collisions effects on small wildlife is difficult but, as supported by references cited in the attached wildlife reports, there is no doubt that vehicles on the new highway will kill many small animals. Similar to our observation for big game, the effect will also be additive to mortalities experienced on the existing route, regardless of alternative chosen, because the existing road will remain open after the new highway is completed.

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[6] Note that wildlife collisions in this context appear to be "big game" collisions only. The DEIS should be clear about what defines a wildlife collision.

[7] Note that on P 114, the number of wildlife collisions in the project limits is given as 37. Table 30 indicates that there were 31 for the same period. The discrepancy should be resolved.

The DEIS effects analysis should include acknowledgement that species of wildlife in addition to big game will be killed by vehicles, and that the number of wildlife killed will increase substantially with the larger highway footprint (more distance to cross) and higher speeds.

Although the DEIS states that crossing structures will be constructed to help small wildlife safely move across the highway prism, more detail would allow resource agencies to determine whether the structures will be adequate in placement, design and number to offset these effects (see Mitigations below).

Mitigations:
The most pervading limiting factor and threat for wildlife in the Palouse ecosystem, including the Project Area, is the loss of habitat to agriculture and other development. Palouse Grasslands have been converted nearly 100 percent to cultivated agriculture, making it an imperiled ecosystem (Lichtardt and Mosely 1997), perhaps the most endangered prairie ecosystem in North America (Noss, *et.al.* 1995). Nearly 90 percent of Ponderosa pine plant communities have been lost in Latah County as well. Remnants of native Palouse plant communities may provide habitat for some species of wildlife dependent on those plant communities, including some of the species included in this DEIS. Although the project will avoid direct impacts to remnant native plant communities, the effects of highways extend well beyond the edge of pavement (Forman and Deblinger 2000). We anticipate the new road will have indirect effects on some of those plant communities and their associated wildlife. The DEIS does recognize the indirect effect of weed incursion and measures to minimize indirect impacts of weeds have been proposed in Chapter 9.

In the Project Area are habitat types that provide relatively undisturbed cover and forage for many species; for instance, mixed grassland, shrub and forest that provide year-round habitat for deer, elk, moose and a variety of other game and non-game bird species. Agricultural fields provide habitat for species like pheasants, quail and gray partridge, but only if adequate grassland and woody cover is available nearby. The highway project will unavoidably reduce some of these valuable habitat components in the Project Area.

Habitat and wildlife would be most severely impacted by the proposed eastern corridor because the proposed eastern corridor lies along the toe of the Paradise Ridge slope, which supports a rich diversity of native Palouse Prairie and important stands of Douglas hawthorn and Ponderosa pine. It is home year-round to elk, white tail deer, moose and a variety of other wildlife. In addition to direct effects, the highway project is likely to have the greatest indirect impacts on wildlife if the eastern corridor is selected (Melquist 2005a; Melquist 2005b; Forman and Deblinger 2000). For instance, elk are likely to be displaced from suitable habitat along the base of the ridge as a result of increased activity (Melquist 2005a); other species may be displaced from suitable habitat as well.

The first priority of mitigation should be avoidance, but that is not always possible or feasible. However, regardless of alternative selected, some wildlife habitat will be lost. Because wildlife habitat is in such short supply and already at risk in the project area, replacement of the habitat lost as a result of the project should be a consideration of mitigation for this project.

The DEIS refers to IDFG June 28, 2007 correspondence with ITD on pages 16 and 17.[8] In this correspondence, according to the DEIS, IDFG suggested that ITD establish a bank or trust to be used for easements or habitat improvements in the Palouse region "instead" of ratio-based habitat replacement and big game passage structures. This is only partially correct as IDFG agreed not to further pursue passage structures for big game. To be accurate, the DEIS should also reflect that IDFG modified the ratio previously used to calculate impacts; the trust proposal retained a habitat ratio basis. It should also be noted that an adjustment to this proposal by IDFG was to calculate the habitat loss for the highway footprint only and no buffer was included in the revised calculations. IDFG acknowledges that ITD does not favor this approach and both agencies have initiated discussing a MOU instead.

IDFG appreciates that ITD has included some of our wildlife mitigation suggestions for wildlife in the DEIS (Table 68), including nest boxes for pygmy nuthatches, timing removal of trees to avoid nesting birds, and design and installation of culverts and overpasses to allow for passage of terrestrial wildlife. However, other IDFG mitigation recommendations have not been included.

Mitigations recommended by IDFG that were not incorporated into the DEIS include:

- Passage structures: Our recommendations included retrofitting existing US-95 bridge/culverts to allow passage for small wildlife. Retrofitting was recommended to help mitigate not only the loss of wildlife on the new highway, but also to help mitigate some of the additive loss of wildlife that will occur because the existing highway will remain open after a new highway is built. We appreciate that ITD has included a commitment to providing wildlife passage in new structures in the Mitigation Measures; however, a firm commitment to retrofit existing structures "where appropriate" to address cumulative impacts from new and existing highway presence would strengthen the mitigation approach.

More detail about the locations and design of the passage structures would improve the DEIS. The effectiveness of wildlife passage structures relies on careful site selection, as well as vegetation and design features to lead wildlife safely to the structures. Such details are not currently included in the DEIS. The effects analysis relies, in part, on the effectiveness of mitigations identified. Because passage features are offered as mitigation measures in the DEIS, the siting and design elements of each of the passage structures that ITD intends to install should be clearly described in enough detail so that IDFG and other resource agencies can evaluate their potential effectiveness.

- Short-eared owls: To reduce vehicle collisions with low-flying short-eared owls, a SGCN species, we recommended installation of reflective posts or installation of reflectors on other highway structures in key flying/forage areas identified by wildlife biologists. We also recommended avoidance of known nesting sites during construction, to be identified by pre-construction surveys. Neither of these recommended mitigations are considered in the DEIS.

[8] The DEIS refers to correspondence in May, 2007. Although we received correspondence from ITD, IDFG has no record of correspondence sent to ITD in May, 2007. We believe the correspondence described in the DEIS is most likely our letter of June 28, 2007 to ITD, based on the description in the DEIS. The DEIS should resolve the dates of correspondence referred to in the text.

- Bats: For bats, we recommended installation of day and night roosting facilities in culverts and bridges, retrofitting structures on the existing US-95. We also recommended designing new structures without sealed joints to discourage roosting. Retrofitted roosting installations and locating water features away from the highway would help move bat activity away from the highway and reduce collisions. The DEIS commits to building bat boxes, which could be beneficial, but does not indicate how many, or where these would be placed to mitigate impacts from the highway. Building replacement pond /wetland forage areas away from the highway was another mitigation we recommended, and one that ITD committed to implement, which we appreciate.

Miscellaneous comments:
Page 106. The DEIS says the project area has not been included in IDFG moose and deer surveys. The inference from the following text (apparently taken from the Sawyer wildlife report) is that IDFG did not conduct surveys for those species because densities of those species are too low to be worth consideration. In fact, IDFG does not conduct surveys specifically for moose and white-tail deer in the Clearwater Region so the lack of surveys is not related to wildlife density.

The description on p 106 also demonstrates a lack of understanding of IDFG's elk survey methodology that is too complicated to attempt to correct in these comments. It should suffice to say that the Paradise Ridge (E-2 corridor) area is within two aerial survey subunits of Game Management Unit 8 that, because of low densities of elk, are flown less than other subunits. Also, past surveys have also shown that elk are rarely present on those subunits during the months that surveys are flown. That does not mean, however, that elk are not present in those subunits then or at other times of year. It would be more informative to consider that elk numbers across Game Management Unit 8, which incorporates Paradise Ridge, have been steadily increasing. Note that elk surveys are not flown annually, but every several years (typically 3-5 years). Unit 8 was surveyed in 1997, 2004, and 2009.

Finally, the statement that *"The number of moose and elk that utilize Paradise Ridge is so low, and use is so unpredictable, that capturing an adequate sample of animals is not feasible"* and a comment on p 105, that the area is unable to support "*measurable numbers*" of deer, elk and moose should really reflect that effort has not been made to measure the number of deer and elk.

Pages 153 – 154 (Tributary Effects) compares the amount of riparian habitat that would be disturbed in E-2 with other alternatives, concluding that there would be less removal of vegetation and less erosion and sedimentation due to channel realignments. The comparison of riparian habitat is based only on area, and does not address the quality of the habitats affected. Assessment of the quality of the riparian habitats that will be affected is important to comparing impacts to habitat and wildlife in various alignments. Melquist, Ruediger, Sawyer, and IDFG all identify the E-2 corridor as having the better habitat of the three alternatives, all with emphasis on remaining intact or functioning riparian areas. The DEIS touches on the relative value of the habitat on p 166, but not in this discussion.

Page 212. Habitat for elk and moose is not "*confined to*" the Paradise Ridge vicinity (E-2) as stated in the DEIS. The best of the habitat available is in the E-2 corridor, but other alignments will also affect habitat for these large ungulates. That the best remaining large ungulate habitat in the project area is in the E-2 alignment reinforces conclusion that the E-2 alignment, of the alternatives, will have the greatest impact on big game and big game habitat.

IDFG appreciates the opportunity to provide technical comments for the DEIS. Please contact Ray Hennekey, Environmental Staff Biologist, Clearwater Region 2 Office, Lewiston (208-799-5010) if you have any questions regarding our technical comments. IDFG looks forward to continued dialogue with ITD to advance a MOU to address mitigation measures and we will be contacting regional ITD staff to continue our discussion.

Sincerely,

Sharon W. Kiefer

Sharon W. Kiefer
Deputy Director

SWK:lm

C: D. Cadwallader, R. Hennekey, IDFG
B. Butler, Office of the Governor

References

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Sawyer. H. 2010. Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow. Western Ecosystems Technology, Inc.

Date

Idaho Department of Fish & Game
3316 16th Street
Lewiston, ID 83501

RE: US-95 Thorncreek Road to Moscow L-31 DEIS comments

Dear Sir or Madam:

The Idaho Transportation Department (ITD) received your Letter regarding the referenced project and is providing the following as a follow-up to your concerns. We also appreciate you reviewing these comments and responses during our meeting on May 20, 2014. The bolded headers correspond to those headers on your comment letter.

Preferred Alternative
We acknowledge that the Palouse Prairie remnants are an important ecosystem and that none of the alternatives evaluated in the DEIS, Including the E-2 Alternative would directly affect this ecosystem. Mitigation for possible indirect effects to the Palouse Prairie Remnants are described in the FEIS, Chapter 9, Environmental Commitments and are summarized in this letter.

Mitigation MOU
The referenced statement in the DEIS Table 68 regarding the development of the Memorandum of Understanding (MOU) between Idaho Transportation Department (ITD) and IDFG has been revised and mitigation measures are incorporated into the FEIS, Chapter 9, Environmental Commitments. No MOU will be prepared.

IDFG Wildlife Report:
The descriptions of the technical report titled General Wildlife Assessment; Thorncreek Road To Moscow (2006) which was referenced in the DEIS page 22, p162 and p168 were modified in the FEIS Section 3.8 to clarify that the IDFG Technical Report did not assess the alternatives' impacts to general wildlife species. The reference to "*key indicator species"* was removed but "*representative wildlife species"* as indicated in the report, remains. The FEIS was revised to incorporate the methodology section from the General Wildlife Assessment (IDFG 2006).

Your comment also stated that the DEIS included species that would act as representative species but that rationale for their inclusion is not provided in the DEIS; specifically for northern alligator lizard, pygmy nuthatch and long eared myotis. The first two species were included in the DEIS because they were evaluated in the IDFG General Wildlife Assessment. IDFG's rationale for including species in the evaluation was that they were either Species of Greatest Conservation Need (SGCN), or in the case of the pygmy nuthatch, were previously SGCN. These species had also been of concern to the public during the scoping period. Melquist identified the long eared myotis as a SGCN although it was not included in IDFG's General Wildlife Assessment. Additional information about the rationale for inclusion of the species in the DEIS and IDFG's use of species as surrogates for effects to and for the mitigation needs for other wildlife species has been clarified in the FEIS Section 3.8.3.

Footnote comments: *There were a number of comments that were noted within the footnotes of the letter.*
Footnote comment #1 states that the IDFG General Wildlife Assessment did not evaluate effects to large ungulates, pygmy nuthatch or Townsend's big-eared bat; however, page 23-24 of the IDFG General Wildlife Assessment focuses on ungulate habitat impacts and mitigation recommendations for loss of habitat for ungulates. The effects to pygmy nuthatch are discussed from page 14 to 15.

Melquist's reports included ungulates, pygmy nuthatch, and long eared myotis and may have been used as the original source of information for the IDFG report. Townsend's big-eared bat was not included in Melquist's report but is included in the IDFG General Wildlife Assessment.

Footnote comment #2 pertains to the lack of rationale in the DEIS for including and focusing on the impacts to northern alligator lizard, pygmy nuthatch and long eared myotis. These species were each SGCN, previously included as SGCN, or were species for which the public and agencies expressed specific interest. The IDFG General Wildlife Assessment indicated that these three species were the only species in IDFG's General Wildlife Assessment for which the effects would differ between alternatives, specifically the E-2 Alternative. Therefore, the differences in impacts to these three alternatives were described in more detail in the DEIS. While the DEIS does not describe for which species the northern alligator lizard, pygmy nuthatch and long eared myotis would act as surrogates, this same explanation is not provided for the remainder of the species that are described in the IDFG General Wildlife Assessment; however it may be presumed that the report intended that the species would be surrogates for other species occupying similar habitat. This explanation has been provided in the FEIS Section 3.8.2, Methodology as stated below:

> *"This report assesses the alternative's impacts to representative wildlife species that would provide an indication of not only of impact for all species, but suggests suitable protections and mitigations for unavoidable impacts. The limited number of species evaluated serve as surrogates for all other wildlife species expected to be present in the project area that might utilize similar habitat."*

General Wildlife Assessment, Thorncreek to Moscow (December 2006). This report is a general assessment of wildlife impacts for the US-95 Thorncreek to Moscow Project. IDFG evaluated impacts of the project on Idaho Species of Greatest Conservation Need. It was determined that impacts to species of greatest conservation need found within the project area would provide an indication of impact for all species. This report suggests suitable protections and mitigations for unavoidable impacts. The limited number of species evaluated serve as surrogates for all other wildlife species expected to be present in the project area that might utilize similar habitat (IDFG 2006). It has also been clarified in the FEIS Section 3.8 under Wildlife Species.

Wildlife Effects Analysis: General Comment

The objective of the Sawyer report was to provide an independent assessment of potential big game impacts, which were primarily based on the reports by Melquist and Ruediger and did not evaluate the IDFG report; therefore, it was removed from the referenced statement. See FEIS Section 3.8.2 Methodology.

The Sawyer report evaluated and summarized ungulate habitat in the corridors and the relative impacts by alternative. The Sawyer report found that the Melquist and Ruediger reports were consistent regarding general habitat quality and the relative alternatives' effects to habitat. The Sawyer report also provided new information that was available since the previous reports were prepared which also supported the conclusions of the reports. That information was presented in the DEIS.

Both Ruediger and Melquist stated that the alternatives would not have population level effects to ungulates and that no mitigation was required for population level effects. Both offered optional

recommendations that included (limited) wildlife crossing, fencing, habitat preservation and other measures that could benefit individuals and mitigate for animal vehicle collisions. However, these were not required, nor are they likely to be effective without land use control in the surrounding properties. More extensive wildlife mitigation was not considered appropriate due to the following factors:

1. The Idaho Highway Linkage Assessment (Geodata Services 2008) prioritized the Thorn Creek Wildlife Linkage as "low priority". This assessment was conducted by Idaho Fish and Game in April 2007 and included personnel from IDFG Region 2, US Forest Service, Bureau of Land Management, and US Fish and Wildlife Service representation.
2. Habitat along the project area is primarily privately owned. The area, especially to the west, is adjacent to the city of Moscow where future developments are likely.
3. Deer, elk and moose habitat to the west is mostly farmland and residential and is generally not suited to be managed for wildlife. There is not significant habitat to warrant habitat connectivity or more extensive wildlife crossings.

Melquist's report under Mitigation Requirements (page 24) stated that there would be no population level impacts due to the alternatives and therefore mitigation was not required. However, he acknowledges that there may be impacts to individual ungulates through increased road kills, possible habitat avoidance, and increased risks to motorists and offers seven recommended actions that would benefit deer, elk, moose, and other wildlife should transportation corridors be constructed. These recommendations include 1 or 2 possible wildlife crossings near draws, fencing associated with the crossings, habitat preservation near those crossings and other measures. However, he further states that not implementing a recommended action would not jeopardize populations of any of the species.

Road kills and associated risks to motorists were considered in the AASHTO Safety Analysis and are mitigated for in the proposed alternatives' design. Clearing vegetation from the clear zone, widening the roadway and improving the sight distance are all mitigating factors that are expected to substantially reduce the animal vehicle crashes (AVC). On US-20 between MP 369 and 375, similar improvements reduced the AVC by 85 percent (ITD 2012). To further mitigate for the possible AVCs, if the E-2 Alternative is selected; ITD will monitor AVCs and address the AVCs if monitoring results indicate it as a problem.

Ruediger's report did not recommend large game crossings nor did he recommend replacement of lost wildlife habitat. However, in recognition of the resource agencies' desire for mitigation, he made three optional recommendations, all of which were considered and included in the DEIS Chapter 9, Environmental Commitments. These were:

1) Allow animal crossing at county road underpasses of US-95 where wildlife use is expected and where wildlife are welcome on private lands (deer, elk and moose).
2) Provide oversized culverts to allow for small terrestrial movement.
3) Replace water sources on the east side of the highway should water sources be impacted; however, water sources are not expected to be impacted.

Fencing will also be provided to prevent animals from getting onto the highway in areas where collisions are most likely and to funnel animals into crossings. Additional detail about the crossings for small terrestrial movement and fencing has been added to the FEIS Chapter 9, Environmental Commitments.

Regarding the consistency of the findings between consultants regarding elk and moose habitat, Sawyer's independent assessment agreed with both Melquist and Ruediger that elk and moose habitat was "marginal" and that mitigation "maybe warranted" for white-tailed deer (Sawyer 2010). Sawyer was also asked to make an independent assessment of mitigation and make mitigation recommendations based on the actual impacts and whether the mitigation would be effective. This process and the rationale for Sawyer's recommendations are explained in detail in the FEIS under Ungulate Effects.

Wildlife Effects Analysis-Indirect Effects
The referenced statement on page 166 is within the DEIS Chapter 4, Environmental Consequences, which analyzes the *direct* effects to resources. Indirect effects to fish and wildlife, including the effects of fragmentation and induced growth to ungulate movement, were discussed in the DEIS Chapter 6, Indirect and Cumulative Effects, Section 6.1

Indirect Effects under the header of Fish and Wildlife. Additional information regarding displacement acreages and buffers, noise effects and other effects to wildlife that are in the wildlife reports has been added into the respective sections of the FEIS. Additional information regarding mitigation recommendations is included in the FEIS Chapter 9, Environmental Commitments.

Footnote comment:
The footnote statement: *"It would not disturb the forested habitat on Paradise Ridge but is closer to Paradise Ridge than the other alternatives."* is contradicted on the next page. For clarification, the forested stand that is impacted is near Eid Road and is not part of the forested habitat on Paradise Ridge. See DEIS Section 4.8 Exhibit 29, Habitat Feature Effects.

Wildlife Effects Analysis: Species Selectivity
The wildlife sections disclosed impacts to many wildlife species including deer, elk, and moose the SGCN evaluated in the IDFG General Wildlife Assessment and additional species that were raised as concerns during the public involvement process. The DEIS discusses the effects to the northern alligator lizard, pygmy nuthatch and long eared myotis in greater detail because they are SGCN for which effects differ between alternatives which would be an important consideration for the public and decision makers when comparing alternatives. The effects to the additional 34 SGCN were provided in the DEIS Table 47 and are available through the technical reports. The information was not detailed in the DEIS because the effects were not differentiated between alternatives in the IDFG General Wildlife Assessment. The details regarding the other species are provided through references to the technical reports. The rationale for discussing these species in more detail is clarified in the FEIS Section 3.8.

Habitat
The sentence was deleted and restated as follows: "While Melquist stated there would be no direct impact to long-eared myotis or pygmy nuthatch due to construction of any of the alternatives, the loss of habitat is expected to result in indirect impacts to resident populations. (Melquist 2005b). See Section 6.1 Indirect Effects.

Melquist identified other suitable habitat nearby at Paradise Ridge and throughout Northern Idaho (Melquist 2005b). In his report Melquist states that other pygmy nuthatch suitable habitat is located near the Dumroese property, near the Robinson Lake Park in Moscow, Idler's Rest and most of the areas of the Palouse that still have ponderosa pine (Melquist 2005b; figure 3). The WCS (IDFG 2005) generally describes the Palouse Prairie Ecosystem and provides mapping of dry conifer forest, listing it as habitat for many species including pygmy nuthatch and northern alligator lizard. Dry conifer forest is shown to cover approximately 42 percent of the Palouse Prairie Ecosystem (IDFG 2005)"

In addition, supplemental information regarding fragmentation of pine stands and possible effects to pygmy nuthatch was added to the FEIS Section 6.1 under Fragmentation.
Mitigation measures that would mitigate for the loss of the pine stand include adding nest boxes per Dr. Melquist's recommendation (page 231) and removing trees outside of the breeding period (also page 231). See FEIS Chapter 9, Environmental Commitments. ITD is committed to working with IDFG before final design on implementing these mitigation measures. Indirect effects are considered in the DEIS and FEIS Section 6.1.

Cumulative Effect
Citations are not provided for all general statements but are referred to in each respective methodology section where the technical reports are referenced. This is in part to make the document reader friendly. However, the respective referenced section in the FEIS has been modified and a citation added to the end of the sentence. Additional information regarding habitat fragmentation is also included in the technical reports and Chapter 6, under indirect effects. DEIS Chapter 6 describes the indirect and cumulative effects to several resources including wildlife and vegetation, wetlands, and species of greatest conservation need. Additional information was added to the FEIS Chapter 6, Indirect and Cumulative Effects regarding to specifically address Palouse remnants and Species of Greatest Conservation Need.

Elk, moose and deer
The specified reference to the adaptability of non-native species and habitat generalists such as raccoon and deer, to human activities is documented in the technical reports including Ruediger 2007 and Melquist 2005. The references to Ruediger 2007 was added and the referenced statement regarding habitat generalists in Section 6.2.3. The statement "elk and moose are more specific to …human use patterns", has been clarified to say that elk and moose are more sensitive to human use patterns than deer in the FEIS Section 6.2.3.

Wildlife Collisions
A wild animal crash is defined as a reported vehicular crash over $1,500 where a police officer reports a wild animal crash event in the police report. A wild animal crash may be caused by many different species of wild animals, including small animals that are not classified as big game as long as the police officer estimates the property damage to be greater than $1,500. Domestic animals are not included in this definition, since police have a separate category for domestic animal crashes. You have also indicated that there is a discrepancy in the number of wildlife collisions in the project area. This has been corrected in the FEIS Section 3.10.

ITD agrees that wild animal crashes are important to consider and for this reason, ITD has contracted with Utah State University to assess methodology for prioritizing appropriate mitigation to reduce big game AVC. ITD appreciates information provided in the IDFG's wildlife linkage database and has referenced the database in the Safety Analysis used for the DEIS and the revised Safety Analysis in the FEIS.

ITD is more concerned with crash types that typically result in greater severity than crash types that generally result in low severity. The Federal Highways Administration (FHWA) has established societal costs for the different crash types that can be found in a publication called Idaho Traffic Crashes 2012 created by the ITD's Office of Highway Safety. A fatality cost is estimated at $6,295,406 and a property damage only crash is estimated at $6,739. To place the severity of crash types and their costs in perspective, the economic cost of one fatality is equivalent to 934 crashes with property damage only using the costs estimated by the FHWA.

Wild animal crash severity is typically very low compared to other accident types and therefore, wild animal crashes are not one of the eleven emphasis areas in Idaho's Strategic Highway Safety Plan. In the past 10 years, 476 wild animal crashes have been reported along US-95 in District 2. Of the 476 wild animal crashes, no fatalities have been reported and only three severe Type A crashes have occurred. About 91 percent of the wild animal crashes have resulted in property damage only. Intersection crashes are an emphasis area in Idaho's Strategic Highway Safety Plan because the severity of intersection related crashes tends to be high. In fact, Idaho's Strategic Highway Safety Plan states that 17 percent of the fatalities in Idaho from 2004-2008 were intersection related. Head-on crashes are also a very serious crash type. In 2012, head on crashes were the leading event related to fatalities in multiple-vehicle crashes. 16.4 percent of all multiple-vehicle fatalities in 2012 listed a head-on crash as the leading most harmful event.

ITD acknowledges wild animal crash potential may be greater for the E-2 Alternative than the other action alternatives based on findings in the wildlife reports; however, this would be offset due to the E-2 Alternative's better sight distance through the ungulate impact area than the other action alternatives because of its straighter roadway geometry.

In addition, ITD is using a roadside-clearing countermeasure that will remove trees and vegetation along the highway to eliminate places that wildlife can hide near the highway giving the motorists greater sight distance. The greater sight distance will give motorists more time to react to wild animals near the highway reducing the predicted crashes.

The roadside clearing crash countermeasure has been observed to result in a 50 percent to 90 percent reduction in wild animal crashes as shown in the revised Safety Analysis (ITD, 2013).

Although the proposed posted speed limit on all three action alternatives will be raised five miles per hour through the wildlife crossing area identified by the IDFG, all three action alternatives would have greater sight distance than the existing route and the E-2 Alternative would have the greatest sight distance of the three action alternatives which is expected to reduce AVC potential.

Wild animal crashes on the existing US-95 loop, if an action alternative is constructed, are predicted to be substantially lower than existing conditions because the estimated average daily traffic (ADT) of the existing US-95 loop is expected to be very low. The ADT of US-95 in the project area is currently about 5,200. If an action alternative is constructed, the ADT of the US-95 loop is estimated to be 200 to 300 depending upon which action alternative is constructed. The very low ADT of the existing US-95 loop will greatly reduce the potential AVCs. Wild animal crashes are included in the crash predictions, but not quantified.

Mitigations

ITD recognizes that the E-2 Alternative would affect habitat that is more suitable for many wildlife species compared to the other alternatives and appreciates your suggested mitigation measures. The reference to the IDFG June 28 correspondence regarding the habitat ratios and mitigation has been further detailed in the FEIS Section 4.8 and Chapter 9, Environmental Commitments.

The following responses to your additional suggested mitigations are provided below and are also contained in the FEIS Chapter 9, Environmental Commitments.

- Passage Structures: ITD will not be able to retrofit the existing US-95 bridge/culverts to allow passage for small wildlife but will discuss the possibility of future retrofits during road improvements along existing US-95 with the NLCHD during the road transfer negotiations. ITD will not be able to provide details regarding the site selection, design elements and design details of passage structures in the FEIS because the specific details regarding topography, road elevations, grades and structure requirements are not known at this time. Locations and designs of passage structures will be determined before final design in coordination with IDFG. General information about culvert sizing, and suitable surfacing, and fencing to accommodate wildlife crossing at underpasses is provided in the FEIS Chapter 9, Environmental Commitments.
- Short-Eared Owls: ITD will install reflective posts/delineators or install reflectors on other highway structures in key flying/forage areas identified by wildlife biologists. ITD will also conduct pre-construction surveys and avoid nesting sites during construction.

- Bats: ITD will install day and night roosting facilities, Roosting installations will be relocated away from the highway to reduce collisions. New structures will be designed without sealed joints to discourage roosting. ITD will mitigate for wetland impacts and impacts to waters of the US which will result in a zero net loss of wetland functions and values.

Miscellaneous comments:

- Page 106. The statement regarding IDFG moose and deer surveys has been corrected in the FEIS Section 3.8.3.

- Page 153-154 (Tributary Effects). The discussion of the quality of riparian habitat is described in the DEIS Section 4.6.1 Tributary Effects and Section 4.6.2 Wetland Effects. These sections acknowledge that while the E-2 Alternative would affect less area of tributary, that the E-2 Alternative would affect the highest quality habitat because they are headwater streams. Additional discussion of the quality of the riparian habitat has been added to the FEIS Section 4.8 under Riparian Habitat Effects.

- Page 212**.** The statement has been clarified in the FEIS Section 6.2.3.

ITD appreciates IDFG's technical comments on the DEIS and we look forward to the continued coordination before final design and through implementation to ensure that the mitigation measures are successfully implemented.

Sincerely,

KENNETH G. HELM
District Transportation Planner, Senior

KGH:cty/Document2

bcc: TPS2 EPS2 DE2

City of Lewiston
IDAHO'S ONLY SEAPORT
POST OFFICE BOX 617 · LEWISTON, IDAHO 83501
(208) 746-3671

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File By / No. _____

March 5, 2013

Mr. Kenneth G. Helm, District Transportation Planner Senior
Idaho Transportation Department
PO Box 837
Lewiston, ID 83501

RE: Project No. DHP-NH-4110(156); Key No. 09294
Comment Period Extension for the Draft Environmental Impact Statement (DEIS), Thorncreek Road to Moscow

Dear Mr. Helm:

The City of Lewiston strongly supports the preferred alternative identified as E2 in the DEIS for the US-95 Thorncreek Road to Moscow project. This project has long been needed to address the dangerous conditions on US Highway 95 from Thorncreek Road north to the Moscow city limits that have caused numerous fatalities and injuries to motorists utilizing this section of highway.

Approximately 6,100 vehicles travel this route each day and the current conditions have resulted in eight accident-related deaths and 207 accident-related injuries since 1997. This highway is the only full length north-south transportation corridor for the State of Idaho and the perilous conditions of this stretch of highway pose significant dangers to users.

These comments are not intended to encourage Federal or State of Idaho regulatory agencies to lessen regulatory oversight and/or take shortcuts in the approval process, but instead, urge them to prioritize review processes and to appropriate funds so that these much-needed improvements can be made as soon as possible.

Sincerely,

Mayor Kevin Poole

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MAR 12 2013
DIV. OF HIGHWAYS
LEWISTON, IDAHO

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	ALL SUPV		

Cc: Lewiston City Council, City Manager Jim Bennett
JHB/jas

TREE CITY USA

L-64

Date

City of Lewiston
PO Box 617
Lewiston, ID 83501

RE: US-95 Throncreek Road to Moscow
L-31 DEIS comments

Dear Mr. Poole:

The Idaho Transportation Department (ITD) received your comment letter regarding the referenced project. ITD recognizes the urgency to improve this stretch of US-95 to improve safety and capacity for the travelling public and the community. ITD and FHWA intend to fully comply with the National Environmental Policy Act (NEPA) process and meet regulatory requirements. Public involvement and agency coordination have been an important part of this process and has continued throughout the development of the FEIS. As a result of the public involvement, there has been additional analysis completed and we feel it addresses the public's concerns and questions. 30 days after Notice of Availability for the FEIS is published in the Federal Register, a Record of Decision selecting an alternative will be issued. An anticipated schedule is provided below but will be updated as needed on the project website.

- Publish 30 day Notice of Availability of FEIS in Federal Register-Summer 2015
- Issue ROD-Fall 2015
- Begin Preliminary Design-Spring 2016
- Begin Right-of-way Acquisition Process-Summer 2016
- Construction 2017-2019

ITD appreciates the City of Lewiston's participation in the environmental process and we appreciate your comments.

Sincerely,

District Engineer
ITD District 2

10.4 Individual Public Comment Responses

This section provides the text of the public comments received and provides a response to each substantive comment. If comments simply restate valid information from the DEIS or support or object to an alternative without the need for clarification or additional information then no specific response is provided. Many responses may simply refer to the General Responses to Issues or a section of the DEIS or FEIS where the existing or new information is provided.

Table 77. Public Comments and Responses

#	First Name	Last Name	Comment	Response
Comment Forms received from Public Hearing on January 23, 2013				
H-1	Mike	Hubbard	I use to drive that stretch of rd. b/w Moscow and Genesee everyday for almost 10 years. We must decide to do something. no action is not an option. I would like to see C-3 complete. E-2 create too much of an enviro. impact and destroys the ridge. I do believe that the right-of-way is to wide. I have lived or been to each state in America. The length b/w the 2-lanes does not need to be so wide. Now my son drives that road each day. I worry about him consistently because of the road danger. I believe C-3 creates the least amount of impact to the greatest number of peoples' enviro.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The action alternative must be analyzed under the National Environmental Policy Act (NEPA). The E-2 Alternative was identified as FHWA and ITD's Preferred Alternative based on a balance of the human and natural environment and the safety benefits to the public as described in General Response Alternative. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Responses Weeds and Wildlife. As described in the DEIS Section 2.4.2, the right-of-way width is based on specific design elements that address the identified deficiencies in the roadway. These include two 12-ft lanes in each direction, a 34-ft median, shoulders and clear zones. These improvements would reduce the predicted crash rates by more than 50 percent over the 20-year design period for any of the action alternatives. The E-2 Alternative, FHWA's and ITD's Preferred Alternative would result in the greatest safety benefit. See General Response Safety-6. The C-3 Alternative improves safety of the highway but not to the same extent as the E-2 Alternative.

#	First Name	Last Name	Comment	Response
H-2	Marshall	Comstock	All 3 alternatives are much safer than the existing alignment. The overriding choice by I.T.D. should be which route is deemed the safest. Although the final choice should not be a popularity vote, my opinion is that the eastern alignment is the best overall choice for a few reasons. 1. Safety 2. Shortest 3. Least expensive 4. Can be constructed with least disruption 5. Poorest soil 6. Does not displace businesses 7. Displaces few real property homes 8. Manufactured homes are temporary in nature and can be easily moved to another location. 9. Please move forward with this project as soon as possible.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis was revised after the public hearing; however, the E-2 Alternative would still have the greatest safety benefit. See General Responses Safety-3 and Safety-6. General Response Displacement-1 offers clarification of residential and business impacts. Manufactured homes and other residences are treated equitably under the Uniform Relocation Act. See the FEIS Appendix 5, Uniform Relocation Act Summary. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-3	Charles	Guthrie	Ken Helm was the least helpful in answering questions. His response to the few questions I asked him was basically 'It's not a big problem' and answered in a manner of brushing it (the questions) to the side. It isn't a good image for ITD.	FHWA and ITD made a good faith effort to offer public involvement opportunities and to answer all questions during the public hearing and regret that you felt your comment was brushed aside. The FEIS provides additional information, corrections, clarifications, and discusses mitigation, which we hope addresses any remaining questions.
H-4	Jim	Prall	My concern is safety of new routes. Why do people die each winter on the relatively new route from Colfax north where the highway leaves the	The route from Colfax north is a two-lane undivided roadway, whereas the action alternatives would be a four-lane divided highway

#	First Name	Last Name	Comment	Response
			canyon and opens up on to the top? Because that is where the weather changes quickly. The E-2 route creates the same new longer hazard. As a lifelong resident of the Palouse, I can't agree with creating that new hazard that extends the Reisenauer Hill danger for miles of new deceptively straight road. It just doesn't make sense. It also doesn't make sense to me economically to maintain two routes, especially in the winter. We can't afford that. Without the local use, the new way becomes "less traveled" than the combined routes and in the winter, that again makes a big difference.	and would be upgraded to American Association of State Highway and Transportation Officials (AASHTO) standards, which would greatly improve safety. See DEIS and FEIS 2.4.2 for a description of the design elements for the action alternatives. General Responses Weather-3 and Weather-4 describe weather conditions including elevation, ice, and snow and how they differ between alternatives. General Response Safety-5 describes the improvements at Reisenauer Hill. See General Response, Maintenance-1 for information regarding maintenance costs. The traffic on the remaining US-95 loop is expected to decrease as described in General Response Safety-3.
H-5	Fred	Gittes	I favor the C-3 Route over E-2. The safety study seems flawed, because of the mild-weather time frame used. It seems clear that in truth, the E-2 route directly over the ridge will be more dangerous than C3.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Weather-2 explains the validity of the referenced five-month data set. General Response Weather-8 explains the validity of the assumptions of weather and safety. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Response Weather-3 regarding elevation and weather related safety between alternatives.
H-6	Janice and Larry	McMillan	E-2 appears to be the best route, however the section showing the hill on the upper Cameron Farms Inc. is of concern. The snow is very significant in that area and has a great deal of	The Weather Analysis was revised and includes additional data regarding elevation and snow accumulation. See General Responses Weather-3 and Weather-4.

#	First Name	Last Name	Comment	Response
			wind. During the winter season there could be much blowing and drifting snow creating some extreme road conditions and create another hazard.	Wind and drifting snow are discussed in General Response Weather-6.
H-7	Jerry	Schutz	I was in favor the first go round and am still very much in favor. Get the shovels working.	See General Response Schedule for a description of the next steps in the environmental process and the anticipated schedule.
H-8	Robert	Hoffman	I am against the E-2 alternative because of landscape fragmentation and encroachment on one of the last, best areas for wildlife on the Palouse. This is also the most expensive option, as it creates the greatest amount of new pavement, which, together with the old route, must be maintained in perpetuity.	The E-2 Alternative would not go over Paradise Ridge but would be located along its base through primarily farm fields and CRP land. Additional information regarding fragmentation, indirect effects and cumulative effects to wildlife habitat on Paradise Ridge has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. See General Response Wildlife regarding effects to Paradise Ridge. See General Response Maintenance-1 regarding general maintenance activities.
H-9	Judy	Sobeloff	Thank you for holding this hearing. I am in favor of improving the safety of Highway 95. I believe that one basic safety measure would be to lower the speed limit by 5-10 m.p.h. After reading about the weather/safety analysis completed by ITD, I believe that the data is incomplete or skewed, given that the study was only done for 5 months in an unseasonably mild winter. Common sense would dictate that a highway going over a ridge would be less safe during a typical winter. In 2002 I had the opportunity to visit a tiny remnant of remaining Palouse Prairie. I believe	See General Response Safety-4 for information regarding lowering the speed limit. General Response Weather-2 discusses the referenced weather data set. Additional information regarding snow accumulation has also been evaluated and is presented in the FEIS 4.10 and the Revised Weather Analysis. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Response Weather-3 through 7 regarding weather conditions. None of the alternatives would directly impact Palouse Prairie remnants. Commitments to

#	First Name	Last Name	Comment	Response
			that unique endangered habitats should be preserved. Given the likely increased danger from weather and wildlife if the road is re-routed to E-2, in addition to the increased environmental impact, I support the option of C-3. Thank-you.	minimize impacts are listed in Chapter 9, Environmental Commitments and indirect effects are discussed in Chapter 6. See General Response Weeds. See General Response Safety-2 for an explanation of how wildlife collision data was considered in the safety analyses.
H-10	Greg	Mack	My understanding is that this may affect less than 7 miles. If safety is the issue, slow the speed limit down for those miles. It would save a lot of time and money. It would also save money by eliminating the lawsuits that are sure to tie this up for years.	See General Response Safety-4 for information regarding speed limits. FHWA and ITD are committed to complying with the NEPA process, which is described in General Response NEPA. NEPA requires FHWA and ITD to evaluate and consider the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-11	Pat	Fuerst	I am a member of the Idaho Native Plant Society, and have served as a secretary for 3 years. I have listened to residents comments and talked with people doing technical studies. I oppose E-2. It will bring invasive weeds to a very large and very rare piece of our Palouse Prairie. Please listen to the Moscow community. They want a highway. Most of them oppose E-2.	See General Response Weeds for information regarding the indirect effects to Palouse Prairie. All public comments are considered during the EIS process. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-12	Thomas	Hubbard	I drive to Genesee from Moscow every day. I think	All of the alternatives would have four lanes and

#	First Name	Last Name	Comment	Response
			that C-3 would be the best option if we do anything at all. I would like to see the 4-lanes so I could get to school fast and even though it does cut farm land I think this is the best option of the three. The right of way does not need to be that large but 4 lanes is important. during the winter I get stuck behind cars that drive very slow too slow. I slow down obviously but some people drive dangerously slow and the 4 lanes would solve that. I think E-2 is stupid for lots of reasons and W-4 wouldn't be bad but at least for me C-3 would be the best.	would decrease the travel time from Genesee to Moscow. The right-of-way at this stage of development is conceptual; however, the elements of the typical section for the action alternatives include the four lanes, a 34-ft median, clear zone and shoulders as described in the DEIS and FEIS Section 2.4.2. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-13	L. Roger	Falen	ITD recom[m]ends E-2, build it there.	Thank you for your comments.
H-14	No Name	–	I place much more confidence in the ITD design people than a bunch of NIMBY [Not In My Backyard] tree huggers. Build the E-2 route and hurry up about it!	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-15	Margaret	Dibble	I currently drive about 5 miles along Hwy 95 twice a day and have done so for the past 25 years. Before I moved to Jacksha Rd. I lived on Hwy 95 about 2 miles south of Moscow. I have seen a lot of accidents along the highway all caused by bad driving and bad weather. I cannot understand why the ITD prefers the E-2 route; it is higher where the	Bad driving can be related to individual actions but roadway geometry may also contribute to crashes. FHWA and ITD propose to improve safety by correcting roadway deficiencies and designing the roadway to AASHTO standards. See General Response Weather-3 regarding weather related to elevation.

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			weather is worse and there is more likely-hood of hitting a deer or a moose. E-2 puts alot more land under asphalt than C-3. I prefer C-3 because it is lower and weather is less severe and driving conditions are better. Building along the E-2 just encourages idiot drivers. Please reconsider C-3 as a better alternative. You don't have to go 70 mph all the time.	See General Response Safety-2 regarding how potential wildlife collisions was considered in the safety analyses. As stated in the DEIS, the E-2 alternative would require more right-of-way and new pavement than the C-3 Alternative but would require less than the W-4 and the Modified W-4 Alternative. See General Response Alternative for why E2 was identified as the Preferred Alternative by FHWA and ITD. General Response Safety-4 provides information on lowering speed limits.
H-16	Louise	Regelin	Please proceed as quickly as possible with Alternative E-2 – It's the choice that does the most to improve safety, interferes least with the best farm land, and – due to solar insulation – will be the easiest to keep clear of snow and ice in the winter. Thank you.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. Additional data regarding snow accumulation and solar exposure was evaluated and provided in the Revised Weather Analysis. See General Response Weather-3 and Weather-4 regarding ice and snow.
H-17	Dave	Sherman	Believe Eastern (E-2) routes is safest, most cost effective, and will provide the quickest and most convenient route for the increasing traffic load—Also, it should be easiest to maintain--	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative which includes safety, cost, and travel time which you had mentioned. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained

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				valid. See FEIS Section 4.10 and the Revised Safety Analysis. See General Response – Maintenance -1 regarding maintenance activities.
H-18	Otto	Keyes	I support the E-2 alternative. It seems to be the route with the least negative impact, given all the factors involved. The major displacement of this route will be those along Eid Road, which will not be easy to resolve. However, good faith negotiations should result in an acceptable, though not perfect, solution. There are trade-offs with any route, however, E-2 seems to satisfy the goals of minimizing safety, environmental, and human impact[s]. This issue should be put behind us and action taken to complete the project with alacrity.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Displacement-1 for a clarification on residential and business impacts. See General Response Schedule regarding the environmental process and anticipated schedule.
H-19	Donald	Ball	E2 is the most logical route. Safest and cheapest with the least disturbance to traffic and business. Thank you for providing all the information.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. See General Response Displacement-1 for a clarification on residential and business impacts.
H-20	Bernie	Hermann	This project is not all about Moscow or how to get from Thorn Creek to Moscow. This is more about getting from Boise to Bonners Ferry. Need to look at the big picture and what's best for most of the state. I prefer E-2, the recommended alternative.	As stated in the DEIS, Chapter 1, the project purpose and need is to improve public safety and increase capacity for this section of US-95, which would benefit all users. However, improving this section of US-95 would improve the safety and

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				capacity for regional traffic and freight transport as well
H-21	Jim	Knect	First of all I would like to say that the desire of a few does not or should not outweigh the safety of a far larger number of citizens. Yes there will be people impacted, but no matter what route is chosen it will be an improvement of the existing situation. As a citizen who drives this route on a daily basis I can only ask that something is done soon—before someone else dies on this road. But I guess that a few animals and some Palouse Prairie remnants are more valuable than someones husband, wife, son or daughter.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Displacement-1 offers clarification of residential and business impacts. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-22	Diane	Baumgart	1. The environment/weather study is a joke. 4 mo. of a snowless 2004 or 2005 season. It is exceedingly windy, foggy and a dangerous route. 2. All Idaho state agencies giving impact statements select C-3 as the preferred route. ITD ignores their report? 3. ITD states land use plans would be disrupted by W-4. All but C-3 affects land use and land use plans. Why is there preferential treatment to 'land use' plans regarding W-4. 4. What "park" does W-4 affect. There is no park only donated land to Moscow. Developers "hoped" tax payers would support $2-5 million bridge and road so they had access to their land for development. Tax payers say 'No.'	1. General Response Weather-2 explains the validity of the referenced data set. See General Response Weather-5 and Weather-6, for an explanation of the differences in fog and wind between alternatives. All of the action alternatives would result in a greater safety benefit over the No Action Alternative because the road would be upgraded to AASHTO standards. 2. General Response Agency explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. 3. As stated in the DEIS and FEIS Section 4.2, the City of Moscow states that all three action alternatives would be consistent with their land use plans. However, the Modified W-4 alternative is located the furthest west and closer

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				to the University of Idaho, Pullman and near areas where future development was planned. The alternatives' consistency with land use plans is clarified in the FEIS Section 4.2. 4. The park that Modified W-4 would affect is a ball field proposed by the City of Moscow but which is unplatted. The bridge and road that you mention is not part of this project. Additional clarification of the effects to land use was added to the FEIS Section 4.2. The action alternatives would have Expressway Access control as described in General Response Access.
H-23	Jim	Lion	Based on the discussion with ITD representative, I conclude that the W-4, C-3 and E-2 alternative are similar in that the fatality rate difference between them is not significant. On the other hand, the difference among the alternatives on environmental impact is clearly distinguishable and significant. Clearly, alternative C2 has the least impact. Since safety and environmental impact are the two most important consideration to me. I prefer C-3 over E-2.	The significance of the differences in safety between alternatives is addressed in General Response Safety-6. In reaching a decision, FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. See General Response Alternative regarding why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-24	Bonnie	Thompson	My concerns 1. "Safest" route = E-2 2. Most "economical" construction = E-2 (?) 3. Nice entrance to Moscow = E-2 4. Most sensible route = E-2 5. Shortest route = E-2 6. "Least disruptive" for businesses, farms (?) = E-2	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred

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			7. "Environmentally best choice" = E-2 Route C3 seems sensible but it apparently is potentially not as safe. "I choose route E-2."	Alternative which is consistent with many of your conclusions with the following clarifications that corresponds the numbers in the comment. 1. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. 3. ITD is working with the City of Moscow Entryway Beautification Project as a participant on the steering committee. 6. General Response Displacement-1 offers clarification of residential and business impacts.
H-25	Sara	Holup	With all the talk about safety issues, I wonder why lowering the speed limit on Hwy. 95 has not been tried. This would certainly reduce the accidents. Also enforcing speed limits would be needed. We see very little of this. Having lived with a clear view of Paradise Ridge, from our home on Cameron Rd., for 35 years, I can say with surety, that the weather on the ridge is worse and would be a terrible place for the highway. This was clear by seeing the snow line and fog line, plus the added factor of frequent high winds up higher. I often hike at Paradise Ridge, and I am also very aware of the lovely and unique plants there and the necessity of preserving that environment.	See General Response Safety-4 regarding lowering and enforcing speed limits. The action alternatives would not go over Paradise Ridge, but the E-2 Alternative would be located along its base. See General Responses Weather-3, Weather-4, Weather-5, and Weather-6 regarding elevation, snow, fog, and wind respectively. The action alternatives including the E-2 Alternative would not directly impact native plants on Paradise Ridge but would be closer to Paradise Ridge resulting in indirect effects as described in General Response Weeds and Chapter 6.
H-26	Dennis D.	Ownbey	Please build the safest, most economical and shortest route.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the

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				DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis.
H-27	Wanda	Ownbey	I would like to see the safest and most economical route selected.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis.
H-28	Van	Thompson	I favor "E-2" for the following: Shorter Safer Faster Least Expensive Less environmental damage I resent that a small group of people were able to delay this project because they did not want it in their backyard. Because of their actions more accidents have occurred and will happen in the future before this project is finished! All western routes are impractical. C-3 has merit but should be given less consideration because of safety factors. As a taxpayer and frequent user of that portion of hwy 95 I strongly hope E-2 is approved and completed soon!	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. See General Response Schedule regarding the next steps in the environmental process and the anticipated schedule.
H-29	BJ	Swanson	I personally strongly support E-2. It is clearly the safest, least disruptive and best route. The only improvement may be some types of wildlife	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			barriers and routes under the road bed. Please adopt E-2 and begin construction ASAP.	The county road underpass at Eid Road will be designed to accommodate wildlife movement. It will include fencing to direct wildlife to the crossing locations. Culverts that will be constructed at drainages will be designed to accommodate small terrestrial crossings. See FEIS Chapter 9, Environmental Commitments. See General Response Schedule for an explanation of the next steps in the environmental process and the anticipated schedule.
H-30	Karen L.	Colson	For 11 years I have travelled regularly from Viola to Windy Ridge Kennel on Zietler Road in every season and all types of weather. It is always windy on Zietler Road and many times foggy there when there is no fog on the rest of the 36 mile round trip drive. Elevation is part of the equation but also within the Palouse there is a series of micro-climates that have not been taken into account in the DEIS. The weather study was only 5 months Jan-May of 2005 in the year of the least amt[.] of snow in the past 15 years. This is unreasonable data for extrapolating to what road conditions in the winter on E-2 would be like; fog and black ice are part of winter on the Palouse but are worse at the E-2 elevation and location than they are at the C-3 choice. The impact visually on tourism for "The Palouse" is most minimal with the C-3 choice. Why put a new scar on the landscape when one had 2 choices. This is an additional reason to choose C-3. Can the county afford to maintain the old US 95—why not	General Responses Weather-3, Weather-5, Weather-6, and Weather-7 explain how wind, fog, elevation, and microclimates were considered. See General Response Weather-2 for an explanation of the referenced five-month data set and how it relates was used to rank the larger 30+-year data set. Visual Effects are described in the DEIS Section 4.11. See General Response Maintenance-1 regarding maintenance activities. As stated in the DEIS and FEIS, the E-2 Alternative would not directly impact Paradise Ridge but would have indirect effects due to weeds. See General Response Weeds and Wildlife regarding the indirect effects of weeds to Paradise Ridge and Palouse Prairie.

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			use it. The DEIS maps of impact of weeds clearly show that E-2 will disturb the land so as to allow weeds to impact forever Paradise Ridge that no mitigation will ever turn around. The weed impact from choosing C-3 will not so drastically affect Paradise Ridge another reason to choose C-3.	
H-31	Emma	Schmidt	I support the central plan (C-3) for Hwy 95. This would help preserve the Palouse Prairie from invasive plant species. This seems like the best option. Next would be the W-4 plan because it is the furthest from Paradise Ridge	See General Response Weeds regarding indirect effects to Palouse Prairie due to invasive plants. General Response Wildlife responds to concerns regarding impacts to flora and fauna on Paradise Ridge.
H-32	Duane	Roach	This new route would be the ultimate. The straight design, the wide median, the wide shoulders are all factors that will greatly reduce accidents. The displays that are here today are of great value in showing the people the facts. The staff of ITD involved in the presentation deserve a pat on your back. Thank you	Thank you for your comments
H-33	Catherine M.	Mabbutt	A lot of time has already been spent arguing about "not paving Paradise Ridge". In the mean time, the delay has cost lives, the E-2 alternative looks to be the straightest and impacts the residents and environment the least. As county coroner, I strong advocate for moving forward to improve the remainder of the highway between Moscow and Lewiston to improve safety and reduce lives being lost.	See General Response Schedule for additional information regarding the environmental process and the anticipated schedule. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Schedule regarding the environmental process and the anticipated schedule. General Response Displacement-1 offers clarification of residential and business impacts.

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H-34	Lisa	Kliger	Perhaps the best way is to make a 4-lane out of the existing road –fix it. Fewer people would have to move. But do something soon –I know people who have died on that road. Thank you.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-4 regarding adding lanes to the existing road. See General Response Safety-6 regarding the significance of the differences in safety between alternatives. General Response Displacement-1 offers clarification of residential and business impacts. See General Response Schedule for additional information regarding the anticipated schedule.
H-35	Elaine	Broyles	My main concern is getting this road done for safety reasons. My preferred route is the central one. My second choice is the EASTERN one. Mostly - it is past time to improve this section of the highway!	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-36	Kevin	Renfrow	*E-2 would be the best alternative. I think this is a very good project, because it eliminates all the accidents, and deaths that have been occurring in the Reisenauer Hill area. It also will improve traffic flow on the rest of the road, which should also reduce traffic accidents.	All of the Action Alternatives would greatly improve the safety in the Reisenauer Hill area. See General Response Safety-5 regarding Reisenauer Hill. As stated in the DEIS, Section 4.10, the action alternatives would also improve traffic flow and level of service.
H-37	Louse	Sweeney	We have been waiting too long for a solution. We need to make the existing roadway safer. Use common sense—Stay down off the MOUNTAIN. There is a sensitive ecosystem that should be protected and it does not make sense to climb in elevation to deal with meeting the safety	NEPA required detailed study of a range of reasonable alternatives and disclosure of their impacts to the human and natural environment. See General Response NEPA. General Response Schedule describes the remaining steps in the environmental process and

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			requirements for a highway. Do not WASTE any more time STUDYING this stretch of land. Get BUSY and start construction early in Spring of 2013. We cannot afford to RISK LOSING MORE LIVES. LISTEN TO THE PEOPLE	the anticipated schedule. The action alternatives do not go on Paradise Ridge but the E-2 Alternative would be located along its base. See General Response Weeds and Wildlife regarding the alternatives' effects to Paradise Ridge and sensitive ecosystems. See General Response Weather-3 regarding elevation and weather related road conditions. FHWA and ITD are committed to following the National Environmental Policy Act (NEPA), which requires detailed study and disclosure of the environmental impacts of the alternatives. See General Response NEPA.
H-38	Becky	Paull	I believe the C-3 route is the best option because of a lesser impact. In the meantime, however, why doesn't ITD reduce the speed limit and put up adequate signage at the top and bottom of Reisenauer about the severity of those curves. People who drive it routinely know the curves - those who do not, do not. This type of signage exists in other parts of Idaho and other states.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-4 regarding speed limits and signage.
H-39	Dan	Pierce	The C3 alternative, in my opinion, is the best route for U.S. Hwy 95 realignment. I like C3 because: 1. It impacts the fewest acres of prime farmland and/or statewide important land. 2. It most closely follows present day U.S. 95 (at the south and north portions, especially) 3. There are going to be some homesite business relocations/effects no matter which alternative is used. Summary comment: Let's get this new highway	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The following clarifications are provided which correspond to the numbers in your comment

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			project started as quickly as possible. No more multi-year delays! (Easier said than done) Thanks!	letter. 3. See General Response Displacement-1 for a clarification on residential and business impacts. General Response Schedule describes the environmental process and the anticipated schedule.
H-40	Gerard	Connelly	I owned Tri-State (Idaho's largest independent retailer) for 33 years. I am a former President of the Chamber of Commerce. I am from the Teddy Roosevelt wing of the Republican party. I favor a strong economy, free enterprise and environmental conservation. IDT cannot do the exact right thing…every alternative is wrong. You can only hope to be wrong in the right direction. DO NOT do E2. Do E3. If you degrade the natural beauty of one of the best parts of our area you can never go back and restore it! If you err on the side of environmental conservation you can always go back later and wreck it. No E-2 … Yes E-3	See General Response regarding why FHWA and ITD identified the E-2 Alternative as their Preferred Alternative. E-3 was evaluated but was not forwarded for detailed evaluation during the early stages of alternatives screening because it would have more impacts to wetlands and rare plant communities compared to the E-2 Alternative. See DEIS Section 2.5.2. See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants.
H-41	Ann	Storrar	I prefer the C-3 alternative. It is less disruptive to undisturbed farm land, natural prairie remnants + wildlife that are near Paradise Ridge. I also think that wind, fog, ice and ↑ adverse weather are in the Paradise Ridge vicinity. I think there would be ↑collisions with deer + other wildlife on the Paradise Ridge route. I also believe we need to protect remaining prairie remnants for future generations. I think the safety of C-3 could be improved with increased surveillance by hwy patrol, + by ↓ the speed limit where side roads enter. Thanks for your	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. None of the action alternatives would directly impact Palouse remnants. See General Response Weeds and Wildlife for a discussion of the indirect effects to Palouse remnants and wildlife near Paradise Ridge, respectively. Weather conditions are further discussed in General Response Weather-6, Weather-5,

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			consideration.	Weather-3, Weather-7 regarding wind, fog, ice, and microclimates respectively. See General Response Safety-2 regarding wildlife crash predictions with the E-2 Alternative. The speed limit and enforcement are addressed in General Response Safety-4.
H-42	Jim	Roach	This is so easy! And the ITD is making it harder. The DEIS has nothing to do with the environment. It should read Draft Economic Impact Statement. Keep the new highway off of Paradise Ridge! It's too sensitive for this kind of development. Jim Roach	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. Economic impact is one of the many factors that are considered. See General Response Alternative regarding why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. General Response Wildlife discusses the alternatives' effects to the vegetation and wildlife on Paradise Ridge.
H-43	Dawn	Fazio	I prefer the C-3 alternative because: I value the unique terrain + vegetation on Paradise Ridge. I believe weather would be more severe on E-2 through the winter than the study estimates. I believe it would be noisier for residents on the south side of Moscow with E-2 than C-3 The visual impact of E-2 is higher than C-3 for residents on the south side of Moscow	See General Response Weeds and Wildlife regarding potential effects to vegetation and terrain on Paradise Ridge. See General Responses for Weather-2 through Weather-7 regarding the severity of weather conditions. The differences in visual and noise impacts would be either greater or less depending on the location of the alignments in relation to the residents that are near those alignments. Noise typically decreases 3dBa with every doubling of

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				distance and the noise levels away from the roadway. See the FEIS Section 4.12.1 Noise Effects, for the relative differences in noise impacts by each receptor. Additional detail regarding visual effects for residents on the south side of Moscow was added to the FEIS Section 4.11.
H-44	Gail A.	Byers	The Highway 95 Road Project from Thorncreek to Moscow must go forward on the Proposed E-2 Route as planned and developed by the Idaho Dept. of Transportation. The residents of Idaho AND especially Northern Idaho deserve a safe highway. The time to build the new highway is now. The project has been well documented and researched AND is for the public good.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. All of the action alternatives would improve safety compared to the No Action Alternative; however the E-2 Alternative would offer the greatest safety benefit.
H-45	Jim	Fazio	Surprise everyone. Do the right thing for this community and select the C Route! AND get going on the construction without more delay.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-46	George	Masters	Favor E-2	Thank you for your comment.
H-47	Marc	Blackburn	Thanks for providing us with the ability to comment. While I can see why E-3 continues to be the preferred alternative, I disagree with this assessment. I have driven Hwy 95 for ten years	E-2, not E-3 is ITD's and FHWA's Preferred Alternative. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			now. The weather data doesn't add up. During the winter, the frost line often coincides with the E-2 alternative. While I like the idea of a straight road, I don't see the advantage of having a road covered in snow and ice. I appreciated the desire to make this a safe road, but I can't support this alternative if we get a straighter road and a road with consistently more snow and ice.	General Response Weather-3 describes the relationship between elevation, temperature and frost for the action alternatives. General Response Weather-4 describes the differences in snow accumulation and precipitation between alternatives. The Safety Analysis has been revised since the DEIS was published but the relative safety between alternatives remained valid.
H-48	John	Sweeney	I was here (ITD meeting) over 10 yrs. ago. My gut feeling then was that the existing hwy should be improved to 4 lanes. I feel the same now and urge ITD to now finish this project so we will all be more safe. I travel to Lewiston several days per week and actually alter my work schedule to avoid peak traffic on Thorncreek route. This has been going on too long. It is time to Act Now.	All of the action alternatives would be improved to four lanes as described in the DEIS 2.4.2. Adding two more lanes to the existing alignment would not be a comprehensive solution to the existing roadway deficiencies as described in General Response Safety-4. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-49	Randy	Hayes	1. Prior to this forum, I was under the impression that W-4 was the best option. However, after reviewing the maps, information, and testimony, I believe E-2 is the best route Excellent presentation	Thank you for your comments.
H-50	Norm	Metzker	Hurry—I'm a 50 yr resident so hurry We need improvement	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-51	James P.	Huggins	I oppose the E-2 alternative and support the C-3 alternative. 1. Reasons: Weather—the E-2 alternative is in a very different environment during the winter, having much worse snow, ice and wind then the	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response

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			lower route. The study did not consider the weather in a normal year. I have lived in the area 27 years and have experienced the differences. E-2 is much more hazardous because of weather. 2. E-2 has the most new land that has to be acquired to complete. C-3 has the least. 3. The Paradise Ridge prairie in Rout E-2 is a resource that should not be disturbed. When a road is put through— invasive species will invade the area 1 ½ miles on each side of the roads. 4. C-3 has the least impacts on farms and agricultural land. 5. E-2 has much greater wild life - deer and other animals wandering around. Deer are much less on C-3. 6. I want the least impact on my home area and the highest safety C-3 offers that alternative.	Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Clarifications are provided for the following comments that correspond to the numbers in your comment. 1. See General Response Weather-2 regarding the referenced data set and how it was used to rank the 30+-year data. General Responses Weather-3, Weather-4, and Weather-6 address the weather conditions along the E-2 Alternative: ice, snow and wind respectively. General Response Weather-8 addresses the validity of the Weather Analyses. 2. The Modified W-4 Alternative would require one acre less of new right-of-way compared to the E-2 Alternative. However, the C-3 Alternative requires the least amount of new right-of-way. 3. The E-2 Alternative would be closer to Paradise Ridge but would not directly affect the Ridge or Palouse Prairie remnants. See General Responses Weeds and Wildlife regarding effects including indirect and cumulative effects. 6. See General Response Displacement-1 for a clarification on residential and business impacts. The E-2 Alternative would offer the highest safety benefit. See General Response Safety-6.
H-52	Tom	Anderson	I really appreciate your hard work, expertise and above all, your PATIENCE. Thanks for not giving up. We need the ROAD! I trust that based on your numerous studies, you have a better feel for where the Highway should be built.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			Hopefully, you can get it done before more people die on the unfinished stretch. Thanks!	
H-53	Claire	Anderson	Looking forward to a safer route from Moscow to Thorncreek Rd on U.S. 95. We often travel to Lewiston and are always fearful of the curves and Reisenhaur Hill travel. Please go with the most effective route as soon as possible! Too many lives have been lost on the old road. I trust your ideas after many years of study	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. General Response Safety-5 addresses safety near Reisenauer Hill.
H-54	Robert	Dupea	Good job explaining different routes. In for route E-2.	Thank you for your comments.
H-55	Don Moscow Transportation Commission	Meyers	I have studied all the available data. I worked in the construction business for 21 years and there is no doubt in my mind the E-2 route is the preferred site to build the new road on. It displaces the least amount of homes and businesses, will offer the straightest route and will be easier to maintain in my opinion.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Displacement-1 for a clarification of residential and business impacts. Maintenance is described in General Response Maintenance-1.
H-56	Gaylynn	Clyde	C-3 route would be better alternative or west route for least displacement of residence, less wildlife fatalities. There is fog up on Paradise mountain all the time along with frost which would lead to more accidents. E-2 is not the best route from environmental point, asthetic point.	See General Response Displacement-1 for a clarification on residential and business impacts. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. The E-2 Alternative would not be on Paradise Ridge but would be at a lower elevation along its base. See General Responses Weather-3 and

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			We live at the base of this beautiful mountain and to have a hiway run through is a tragedy.	Weather-5 regarding weather related road conditions including fog and frost. See the FEIS Section 4.11 for additional information on visual impacts.
H-57	D.Diane	Bupea	Great presentation. I'm all for route E-2 — You can't get it done soon enough. The southern section of 4 lane is a joy to drive and much safer! We drive from Moscow to Lewiston usually twice a week.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-58	Ned B.	Klopfenstein	I strongly oppose route E-2 because 1) increased impact to environmental habitat prairie, wetlands especially when considering future development along route 2) increased hazard to drivers from fog & ice weather and wildlife 3) increased loss of farmland, 4) possible complications with future bypass I favor C-3 to minimize environmental impacts and minimize driver safety.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The following clarifications are provided which correspond to the numbers in your comment letter. 1. The E-2 Alternative would have Expressway Access Control, which would reduce the potential for future development along the road. See General Response Access for a description of the access control and future development. See General Response Weed and Wildlife for a description of effect to Palouse remnants and Paradise Ridge and indirect effects. 2. See General Response Weather-3 and Weather-5 regarding fog and ice respectively. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety

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				Analyses. 4. See FEIS Section 4.2 for additional clarification regarding the project consistency with transportation and land-use plans including planned transportation concepts. See General Response Safety-6 regarding the differences in safety benefits between alternatives.
H-59	Jerry H.	Exon	I travel b/w Moscow and Lewiston 4-5 days a week. We have waited 9 years to improve this highway. The environmental impacts have been done, hundreds of thousands of dollars have been expended, and the best route has been determined (again!). It is time to get this dangerous stretch of highway fixed. Let us not have to deal with any more wrecks, people injured and killed in this area.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-60	Wayne	Jensen	Please build the road. If you do E-2—be sure to plant a very hardy vigorous grass on the road banks to slow weed disbursement. We own palouse prairie on ridge so very concerned about more weeds from the highway. Do not allow on-off access east of road to make housing development difficult. No more houses on ridge. I vote for C3.	See General Response Weeds regarding weed dispersal and mitigation commitments. Additional detail regarding Vegetation Management and Weed Control is included in the FEIS Chapter 9, Environmental Commitments. ITD will implement its Vegetation Management Plan to minimize effects to vegetation and habitat. The E-2 Alternative would have Expressway Access Control, which would reduce development pressure along US-95 and minimize indirect and cumulative effects. See General Response Access. See General Response Weeds regarding weed dispersal and mitigation commitments. Additional detail regarding Vegetation Management and

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				Weed Control is included in the FEIS Chapter 9, Environmental Commitments. ITD will implement its Vegetation Management Plan to minimize effects to vegetation and habitat. The E-2 Alternative would have Expressway Access Control, which would reduce development pressure along US-95 and minimize indirect and cumulative effects. See General Response Access.
H-61	M	Huberty	The weather is "Better" up on E-2 than lower down ∴ It is safer, less disruptive, and more practical then the other 2. I vote for E-2.	General Response Weather-3 describes the relationship between elevation, temperature and ice for the action alternatives. General Response Displacement-1 offers clarification of residential and business impacts.
H-62	Doug	Olson	C-3 should start at Reisenaur hill and be just of sewer pond Eid Rd. for trailer court and then connect then connect as drawn— E-2 is the next best location—	The C-3 Alternative actually begins further south of Reisenauer Hill near Thorncreek Road. This is because it would connect to and match the existing four-lane divided highway, which would maintain a consistent roadway design, reduce driver confusion and improve safety.
H-63	Scott	Seegmiller	I believe that ITD has been thorough in its development of the alternatives for this highway project. It's important that this project move forward as quickly as possible. There is no way to accommodate all special interests affected by this project. Therefore ITD needs to move forwards as rapidly as possible with the preferred route (E-2)	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-64	John	Lefler	A lot of good information. Good effort to inform the public. Very good customer service.	Thank you for your comments.

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H-65	Diane	Baumgart	1. What will happen to current US. Hwy 95 if W-4 or E-2 is selected? We need to know. Tax payers do NOT need to pay for another road or duplicate road. 2. Qui bono? Who benefits with E-2? All roads can be made safe. Only C-3 has minimal environmental impacts. Selection of E-2 gives land owners to the west of current Hwy 95 cheaper access their land. Mr. Larry Germer already has his plot (Palouse Developers, LTD) plotted for residential land. Mr. Sherman Clyde decries losing prime farmland. He has already developed part of his land for residential development. Qui bono? Hidden agenda?	1. The remaining US-95 segments may be turned over to the NLHD should an action alternative be selected. General Response Maintenance-1 describes what will happen to the existing US-95 roadway. 2. FHWA and ITD are responsible for ensuring safe and efficient travel for all travelers including local users, commuters, regional travelers as well as freight movement. There is no hidden agenda. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. All of the action alternatives, including the E-2 Alterative, would enforce Expressway Access Control which is described in General Response Access.
H-66	Randy	Haydes	1) Excellent presentation by ITD a lot of work must have gone into the boards and layouts, very much appreciated. 2) Very supportive of this forum, presentation, public notice and acceptance of the publics input. Keep up the good work.	Thank you for your comments.
H-67	Mary C.	Steed	This road needs to be built — enough people have died! The farmer whose land it crosses said it is his most unproductive land and is in favor — One person said it will remove 20 of his trees —	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. FHWA and ITD must balance the alternatives' impacts to both the human and natural

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			trees are renewable — replant them they will grow — The lives lost are not replaceable.	environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-68	Katherine	Masters	I prefer E-2 over C-3 and W-4. C-3 would make Cameron Rd. impossible to negotiate getting on to 95. W-4 sounds like it would cut into too large an area of prime farming land	Access points for all action alternatives would be designed to meet AASHTO Standards and would be safe. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid.
H-69	Jim	Macdonald	The elaborate industry fraud continues! I thought the p.r. materials mailed out were bad enough, Slick, corporateness jumps out from all this! Just more ITD/industry sham. If the DEIS, becomes the EIS, see you in court!	The NEPA process provides public involvement opportunities during the development of the Environmental Impact Statement. Providing publications and materials to the general public is one accepted method to reach out to the public to encourage involvement.
H-70	Diane	Baumgart	I find the written public information provided misleading. 1. If you can "mitigate" environment impacts caused by 'E-2" You can mitigate "crash rates" of C-3. You/We HAVE the knowledge and technology for that work. You can 2. I support C-3 ONLY. You/We have the knowledge and technology to straighten this road AND make safe on and off access. You save prime farmland, our environment heritage/gifts. 3. I question your commitment to saving prime farm land. With U.S. Hwy 95 not a U.S. highway Mr. Sherman Clyde and Mr. Germer (land owners	The intent of the public involvement materials was to summarize information in the DEIS, to summarize the rationale for ITD's and FHWA's identified preferred alternative and to notify the public and agencies of the opportunity to comment and attend the hearing on the DEIS. 1. All of the action alternatives, including the C-3 Alternative, would be upgraded to meet AASHTO standards to mitigate for crashes as described in the DEIS Section 2.4.2. However, because the C-3 would be along the existing route on the north end, there would still continue to be more access points and higher crash rates than the other

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			to the West of current 95 Hwy gain cheaper access to developing land. Mr. Germer of Palouse Properties LTD has already had his land plotted out for residential development. Is there a hidden agenda to benefit "land use."	alternatives. General Response Safety-1 describes why the C-3 Alternative with frontage roads was not forwarded for further consideration. 2. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. 3. ITD will implement Expressway Access Control, which will minimize development along the highway as described in General Response Access. There are not hidden agendas to benefit specific landowners.
H-71	Constance	Dickow	To save farmland, save money and be as safe as possible, my husband and I vote for C-3	While the E-2 Alternative would have greater acreage impacts to prime farmland, it would have the greatest safety benefit of the action alternatives and the lowest total cost. See General Response Safety-6.
H-72	William F.	Greene	For safety reasons, Reisenauer Hill must be avoided which makes E2 the best option. I think ITD must move forward with the E2 option as fast as possible before one more life is lost. Thank you for your work.	General Response Safety-5 describes how the different alternatives address the safety deficiencies at Reisenauer Hill. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-73	Mike	Hoobler	I lost my daughter and unborn grand-child on Reisenauer Hill in 1999. I just want them to do something!! How many more accidents do we	FHWA and ITD are very sorry for your loss. FHWA and ITD must balance the alternatives' impacts to both the human and natural

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			need to have because of the "Coalition" blocking the construction because of a "worm" or "plants" or "killer sunsets" and wildlife. Just last week a friend of mine saw two accidents on the same hill. Let's get started!!!	environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. FHWA and ITD are moving forward with the project but must do so in compliance with NEPA and other environmental regulations. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-74	Don	Strong	I would say pick the safest route and build it. To me all the other considerations are not as important as safety.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The E-2 Alternative would offer the greatest safety benefit. General Response Safety-3 provides information regarding the updated Safety Analysis.
H-75	Zachary	Johnson	I disagree with ITD's proposal to reroute US95 along the eastern (E2) alignment. The E2 alignment	General Response Wildlife addresses wildlife and vegetation on Paradise Ridge. See General

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			presents significant risks to wildlife living on and moving through the Paradise Ridge area. Additionally, by disturbing land close to one of the largest remaining Palouse Prairie remnants, E2 will invite invasive plant species to take over native species on Paradise Ridge. As shown in the vegetation technical report, weeds will extend to 0.6 miles from the roadbed. This takes weeds up the western side of Paradise Ridge. This invasion will further threaten rare species found on Paradise Ridge. I am also skeptical on the safety analysis complied using weather data from January-May 2005, a drought year and one of the more mild winters in recent history. How can such an analysis be anything but flawed? Why is there no data for the last 7 years? While I do support the realignment of US95 to make travel safer, I doubt the DEIS findings on weather analysis. I urge ITD to reexamine the flawed safety study and seriously consider the C3 route as a preferred alternative. IDFG, EPA, USFWS and the Army Corps of Engineers all prefer the central route. Why does ITD insist on the eastern route when the central route fills all the requirements of highway standards? The central route has less miles of right of way acquisition required, is endorsed by several pertinent agencies, will sacrifice less prime farmland, will not damage the Paradise Ridge viewshed as much, and will have the least amount of impact on our precious and endangered Palouse	Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. None of the alternatives would go over Paradise Ridge or directly affect Palouse remnants. General Response Weeds addresses indirect effects to the Palouse Prairie Remnants and Paradise Ridge due to weeds. See General Responses Weather-2 and Weather-8 regarding the five-month data set and the validity of the Weather Analysis. General Response Safety-7 discusses the validity of the Safety Analysis. See General Response Agency regarding the difference in opinion regarding ITD's and FHWA's Preferred Alternative. The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. –

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			Prairie. Again, I am for making US 95 safer, but am baffled by ITDs insistence on the E2 alternative. Don't Pave Paradise.	
H-76	Dan and Gail	Schoenberg	(We) I agree with the conclusions of the ITD study and endorse E-2 as the best alternative route. (signature) (509) 336-1270	Thank you for your comments.
H-77	Dick	Adams	Hurry up and do it.	See General Response Schedule regarding the environmental process and anticipated schedule.
H-78	Lisa	Gadwa	I think you have done A LOT of studies, I was impressed that so many considerations have been addressed. There will always be someone that has a 'very good reason' as to why one way won't be as safe/good as another….again I can only stress how much obvious effort has gone in to making the end result be 'best.' Thanks for making the opportunities available to the public —handling issues correctly instead of blindsiding folks should be a relief not an opportunity for folks to establish a 'cause'.	The NEPA process requires a detail analysis of the alternatives as well as public involvement opportunities. General Response NEPA describes the requirements of the NEPA process. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-79	Rita	Jacksha	Here to register support for Route 'E-2' between Thorncreek Rd. and Moscow. Safety is my highest priority—because E2 eliminates the dangerous Reisenauer hill where I have traveled from country home to Moscow the last 60 yrs.	General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. The E-2 Alternative would offer the greatest safety benefit as explained in General Responses Safety-3 and Safety-6.
H-80	Marsha	Schoeffler	I am strongly opposed to E-2 because 1 - Worse weather conditions at higher altitude 2 - Impact on Palouse Prairie remnants 3 - Most disruption to ungulate habitat and	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient

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			therefore more likely deer/car crashes 4 - Takes more farmland than C-3 5 - Displaces too many people at Eid road crossing. I support the C-3 route because 1 - It will straighten the route 2 - Be no more costly than E-2 (unless frontage roads are constructed) 3 - Will have least effect on wetlands * 4 - Requires least amount of new right-of-way 5 - Is more compatible with proposed Moscow ring road 6 - Would improve safety at North and South ends Although C-3 would have many access points it is no more than currently. If that needs addressing frontage roads should be considered. If the current route is maintained—i.e. the do nothing option—at least create 4-lanes over Risenour Hill. That is the section that needs fixing most. –	transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Your statements regarding the alternatives are accurate with the following specific clarifications that correspond to the numbers in the comment: "Opposed to E-2 rationale" 1. See General Response Weather-3 regarding the relationship between elevation and temperature for the alternatives. 2. The E-2 Alternative would not be constructed over any Palouse remnants but would come closer to more remnants. See General Response Weeds regarding indirect effects. 3. Habitat on Paradise Ridge is discussed in General Response Wildlife. General Response Safety-2 describes how wildlife collisions were considered in the safety analysis. 5. See General Response Displacement-1 for a clarification of residential and business displacements. Support C-3 Rationale: 1. The E-2 Alternative would be a straighter route than the C-3 Alternative as shown in DEIS 2.5 Alternatives. 2. See General Response Safety-1 regarding the cost of adding frontage roads to the C-3 Alternative. 5. See the FEIS 3.2 and 4.2 for clarification of the Ring Road concept. 6. All the action alternatives would improve

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				safety and the northern and southern ends of the project. See General Response Safety-3 regarding the significance of differences between the alternatives. See Safety-5 regarding improvements to Reisenauer Hill. The Do Nothing (No Action Alternative) would remain an unimproved two-lane roadway but could include small improvements like turn lanes at intersections and pavement maintenance. It would not construct four-lanes over Reisenauer Hill. Adding two more lanes to the existing alignment would not be a comprehensive solution to the existing roadway deficiencies as described in General Response Safety-4.
H-81	Tom	Jacksha	Hear to register support for the E-2 section between Thorncreek Road and Moscow. Safety is my highest priority. And because E-2 eliminates Reisenauer Hill danger. As I personally had a very "close call" at the bottom of the hill. E-2 being the straightest and shortest is a huge factor. Environmentally, it appears to have the least impact.	The E-2 Alternative would offer the greatest safety benefit of the alternatives as explained in General Response Safety-3 and Safety-6. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-82	Ron	Crumley	I prefer the E-2 alignment. Please build this soon. The existing route is unsafe in any weather.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Supplemental information regarding snow accumulation was added to the Revised Weather Analysis.

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H-83	Matt E.	Telin	Start the bulldozers now with the E-2 route. The least amount of disruptions during the construction phase.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Construction phasing and construction impacts are described in the DEIS and FEIS Chapter 8, Construction Phasing and Funding.
H-84	Gabe	Gibler	Thank you for going to such efforts to take public comment. Of those presented, my preference is C-3. I dislike E-2 for reasons of what I would call "beauty." While those of more "Commercial" mindsets scoff, I'm sure, at such notions, I consider the natural beauty that remains on and around Paradise Ridge something not to be taken too lightly. There's getting to be little enough land unimpacted by human usage, that it's worth being cautious—something that too many in the West don't consider, since we still have relatively large amounts of "wild" land. I've spent considerable time on Paradise Ridge, having lived on Jensen Rd for a time, and having worked near Paradise Ridge for more than the last decade. In terms of money, there's no real measure for what would be lost by bringing a highway closer to the ridge. A few random points on back: – Reisenauer Hill seems to be the real focal point of safety, yet all options seem to do little about really addressing that. E-2 does approach it on more of the same level, and this is good. But why is excavating out the hill not ever a stressed option?	Additional information regarding visual effects has been added to the FEIS Section 4.11. Project impacts will be minimized by implementing measures described in the FEIS Chapter 9, Environmental Commitments. The E-2 Alternative would not go over Paradise Ridge but could have indirect effects to Paradise Ridge. Indirect and cumulative effects to Paradise Ridge and vegetation are discussed in General Responses Weeds and Wildlife. Regarding Reisenauer Hill, a range of reasonable alternatives was evaluated which included 11 initial alternatives as described in the DEIS Section 2.5.1. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Safety-4 addresses making smaller improvements to the existing US-95 alignment. The DEIS and FEIS include information on induced growth in Section 6.1 Indirect Effects. Growth is expected to occur one mile south of Moscow; however the alternatives would have Expressway Access Control, which would reduce development potential and sprawl. See General Response

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			Why are there not more realignment issues around that hill? Every time I approach that hill on the highway from the N, it seems perfectly feasible to rework the road in such a way that would take it along the base of its slope to the W. What are the costs for reworking that? If all the available money was spent on reworking that, that would be a victory and vast improvement. For C-3, it seems highly feasible to move the bulk of its line a touch E. This would bring it in line w/ most of the property lines. It would require displacing the one farmhouse through which it would pass—this would be sad, for sure, but certainly doable. If these sorts of improvement are to be made, it's only appropriate that it affect human beings. It's human beings who agitate for such improvements in efficiency, and who benefit from it. I would love seeing improvements in the highway, and absolutely agree they need to happen, but not at the cost of creating more human sprawl. I'm confident there are plenty of ways this could be made to work better, even if it does negatively impact a few residents. It is a shame to impact more farmland; but given how much people have already suburbanized prime farmland, there's hardly much argument against it.	Access.
H-85	Doug Latah County S.O.	Anderson	Deer crossing area Thorncreek to top of Reisenauer Hill not a lot of deer north of that to Moscow. E-2 would appear to be the safest and most	Ungulate movement is discussed in the DEIS Sections 3.8 and 4.8. General Response Safety-2 addresses how wildlife collisions were considered in the Safety Analyses.

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			effective from a law enforcement perspective.	The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3.
H-86	Kathy	Gak	Can't happen soon enough! E-2 E-2 E-2	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-87	Keenan	Storrar	1. I'm in support of the C-3 proposed road. Least impact on land and community. 2. W-4 is the plan with my second most support 3. E-2 I do not support. E-2—weed encroachment onto native prairie and snow and ice are major concerns. Sounds like it was a pretty poorly planned snow accumulation study (done during drought year)	1. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The following clarifications are provided which correspond to the numbers in your comment letter. 1. While the C-3 Alternative required less new right-of-way and may have different community impacts, the E-2 Alternative would offer the greatest safety benefit as described in General Responses Safety-3 and Safety-6. General Response Displacement-1 offers clarification of residential and business impacts. 3. General Response Weeds discusses the alternatives' indirect effects to prairie due to weeds. General Response Weather-4 describes the differences in snow accumulation and precipitation between alternatives. General Response Weather-3 describes the relationship

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				between elevation, temperature and ice for the action alternatives. General Response Weather-2 explains the validity of the referenced data set.
H-88	Edwards	Coulter	I prefer E-2 because it is the shortest and safest. Any of the 3 alignments are much better than the "no action" alternative. "No Action" will continue to result in needless fatalities and is an unacceptable alternative.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Safety-3 and Safety-6 provide updated information from the Revised Safety Analysis and results from the Mobility and Road User Cost Study. The E-2 Alternative would still offer the greatest safety benefit and would be the shortest alternative.
H-89	Alan C.	Baker	Very much in favor of E-2 (any but the no improvement model would be a huge improvement). I drive this every weekday to/from Lewiston.	Thank you for your comments.
H-90	James	Ware	E-2 is the most viable option to me from the start. W-4 doesn't address the Reisenauer Hill which is what this project need to get rid of. I like the overall preferred E-2.	General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill.
H-91	Edwin P.	Garretson, Jr.	Thank you for the clear and complete information packet you sent out. I saw that the studies were complete. I support the weight you have given to not choose a route that takes out many houses and business and that values safety. E-2 is so clearly the best route for this road.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Displacement-1 offers clarification of residential and business impacts.

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H-92	Wayne L.	Olson	• It is time to finish the project—Now • E-2 is the best route • C-3 is "O.K." • I believe that ITD has done the best work possible on the impacts, environmental, safety, etc. • If E-2 is selected, I would suggest wildlife migration tunnels placed in the draws beyond the bridge on Eid Rd. • Wildlife fencing should be considered next to Eid Road • It is interesting that Hwy 95-Lewiston to Moscow was open during the heavy snows in the last 3 years while Hwy 195 in Washington was closed—so I don't buy the opposition comments on the E-2 "possible problems." → It is time to finish the project → NOW	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Schedule for a description of the next steps in the environmental process and the anticipated schedule. General Response Safety-2 addresses how wildlife collisions were considered in the Safety Analyses. All of the culverts in drainages will be designed to allow for small terrestrial species and fish passage as appropriate. Under crossings at county roads will be designed to accommodate wildlife. Fencing will be placed to guide animals to the under-crossings. See FEIS Chapter 9 for Environmental Commitments. See FEIS Section 3.10 and 4.10 and the Revised Weather Analysis for additional information regarding weather conditions.
H-93	Nancy	Matthews	I really appreciate all the work, assessment, and evaluation that has gone into this project. Thank you. I am in favor of the preferred eastern (E-2) alternative, closest to Paradise Ridge. I look forward to the completed project and fewer accidents.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would offer the greatest safety benefit as explained in General Responses Safety-3 and Safety-6.
H-94	Gary	Deesten	(1) I am a long time resident of Moscow and favor E-2 area because they can make it safe with less connecting roads. When this first came out all the Environmental Wacko's came out of the woodwork. I don't want to hear about Rare Worms (they found that they exist in the Cascade Mtn range.) The Rare Plants which can be transported. I	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred

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			agree with Jack Flack and all the other Landowners that the C-3 would dislodge many homes or have it on there Door step. It will also knock out wells including Martin Deesten (61) at address 2805 Hwy 95 South. Again E-2 is the best. W-4—not acceptable.	Alternative. See General Responses Wildlife and Weeds regarding additional information regarding earthworms and effects to rare plants. See General Response Displacement-1 regarding residential and business effects. Additional information regarding groundwater and wells are discussed in General Response Water. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-95	Doug	Gadwa	I have lived here for 30+ years driving south to Lewiston. I was very happy to see the 4 lane and hated to have to have the Thorncreek to Moscow be held up for so many years and so many more deaths on this last section of two-lane. Looking at the options I am a supporter of E-2 as the best choice. I have followed the development and talked with the state ITD about the options and E-2 is the best. Get it Done!	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. FHWA and ITD are committed to complying with the NEPA process, which is summarized in General Response NEPA. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-96	Guy	Hopkins	As a planner, I was impressed with the complexity of analysis and breadth of the scope. The one thing I will say that this operation is long overdue! I was surprised with the proposed E-3 preferred alternatives. It was not one that I would have thought of. My major concern for the E-3 option is that of an agronomic nature. My fear is that there will be a large portion of this are that would be taken out of production. There is already too much prime agricultural land removed from production.	See General Response Schedule regarding the next steps in the environmental process and the anticipated schedule. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred

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			In regards to safety concerns, E-3 definitely does not have the least number of effects to safety concerns. I do understand about the C-3 safety concerns but do not feel they are as great as described. My preferred alternative would be C-3. I say this for a number of reasons. The bulk of the proposed roadway has already been disturbed and developed. There are existing rights-of-ways that are already in place. Expansion to the roadway and area would be least minimally impacted. Out of all alternatives, this would be least argonomically invasive and have the least impact. On a socio-economic side, homes have already been established along the roadway. Businesses have placed their operation along the existing Hwy 95 and it would be costly for them to move. Additionally, existing infrastructure exists and would be easier to move those services. For those wanting protection to the Palouse Prairie, I believe C-3 would have the least impact. Due to drainage patterns of the area, wetlands will be impacted and off sets will have to occur. Again, I congratulate ITD on how they went thru the scoping process. Well done!!	Alternative. In your comment letter you stated "E-3, the Preferred Alternative". For clarification, the E-2 is FHWA and ITD's Preferred Alternative; therefore, in our response we assume your reference to E-3 was intended to refer to E-2. While some farmland would be taken out of production, the facility would have Expressway Access Control, which would help limit development along the highway. See General Response Access. The E-2 Alternative would also avoid the most highly productive farmland. The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3 and Safety-6. ITD has heard from landowners that would be affected by the project and the majority affected prefer the E-2 Alternative considering the effects of all the various alternatives. See the FEIS Section 4.1 regarding the direct socio-economic effects. General Response Displacement-1 clarifies the residential and business impacts. See General Response Weeds and Wildlife regarding the disturbance to the ground and protection of Palouse Prairie. Additional information has been added to the FEIS Chapter 6, Indirect and Cumulative effects regarding indirect and cumulative effects to businesses, residences, farmland and habitat. Mitigation measures, including mitigation for wetland impacts, are described in the FEIS

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				Chapter 9, Environmental Commitments.
H-97	Greg	Freistadt	The weather study is bias and does not accurately represent the quickly changing and extreme precipitation/temperatures that occur on the west side of Paradise Ridge. There are strong winds that roll down the west side of the ridge. With them freezing rain and fog are frequent occurrences. I know this from spending every day at the base of the west side of the ridge, where we farm on Clyde land. Another aspect of this proposal that is misleading and to be completely inaccurate, is the length of C-3 vs. E-2. By looking at a map you can very easily see that C-3 is shorter almost by half from E-2. This is not what is reported. Work on existing road, straighten and take out some hills.	See General Responses Weather-3, Weather-4 and Weather-7 for information regarding temperature, precipitation, and weather west of Paradise Ridge respectively. General Responses Weather-5 and Weather-6 describes the differences in fog and wind between alternatives. Regarding the alternative lengths, the C-3 and E-2 Alternatives begin and end close to the same areas but differ in the locations of their realignments. The lengths of the alignments and the descriptions of their beginning and end points are described in the FEIS Section 2.5 Level Two Screening. General Response Safety-6 explains the significance of the differences in length and safety between alternatives. See General Response Safety-4 regarding smaller improvements to the existing US-95.
H-98	Meg	Foltz	I am most interested in the final design and bicycle friendly shoulders. The present 'new construction" south of Thorncreek provides a wide shoulder and a rumble strip outside the fog line. Construction on the north side of Moscow Mtn on Hwy 95 southbound has a wide shoulder for a distance, but the rumble strip and concrete barriers neck down so there is no bicycle lane – for roughly ¼ mile. I want to avoid the second situation.	The design process will begin after the Record of Decision (ROD) has been issued. All action alternatives would increase safety and access for bicyclists and pedestrians. There would be an eight ft. wide shoulder that would function as a shared lane in the rural sections. The urban sections would have a six ft. wide shoulder with sidewalk, curb and gutter. See the DEIS and FEIS Section 2.4.2, Design Elements and Typical Section for Action Alternatives.
H-99	Mathieu C.	Demers	I find all 3 of the current proposals to be undesirable, with the all-star loser being E-2. If the ITD's true main concern is safety, then driving over	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the

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			an icy and foggy ridge hardly seems logical. I would whole-heartedly like to see a revisitation of the W-2 alternative, which seems to avoid the problematic Reisenauer Hill. While there would be the additional costs incurred by a longer route and increased tributary crossings, as well as loss of potential historical sites, I feel this is preferable to the destruction of habitat and view in reference to the E-2 route. There should be a new DEIS (the validity of the 2005 DEIS is highly questionable,) it just DOES NOT jive with 20 years of personal observatinal data). E2 poses significant risk to both large animal collision and destruction of endangered species habitat (Palouse earthworm). Don't Pave Paradise! (signature) 1/23/13	public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Weather-3 and Weather-4 regarding ice and fog in the study area. The E-2 Alternative would not go over the ridge but would be along its base. See General Response Safety-5 regarding improvements to Reisenauer Hill. The W-2 Alternative was eliminated due to its high effects to floodplains, tributary crossings, visual resources prime farmlands and added costs. It would also adversely affect one historic resource. See the DEIS and FEIS Section 2.5.2. See General Response Safety-2 regarding how potential wildlife collisions was considered in the safety analysis. See General Response Wildlife regarding earthworm and other habitat on Paradise Ridge. The US Fish and Wildlife Service has not listed or proposed listing the giant Palouse earthworm as threatened or endangered. Nor has critical habitat been listed for this species. The DEIS was published in 2013 not 2005.
H-100	Andrew	Hudak	It says "Your input is important" on the top of this form, so I'll give you the benefit of the doubt that this is sincere. Yet, why is ITD so insistent on the E2 route when clearly there is such significant, articulate and organized local opposition? I'm a researcher, and I can't help but think that ITD	Public involvement and comment are an important part of the EIS process. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General

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			has biased the analysis (safety and weather variables in particular) to derive their preferred outcome. The safety issues due to higher elevation weather and wildlife in proximity to Paradise Ridge, have not received appropriate weight. The tiny differences between C3 and E2 in terms of cost, length and displacement of homes/businesses are insufficient to significantly influence a decision. It really comes down to the negative environmental impact of E2. ITD needs to take the notice of local information and opinion, and serve the people! Just choose C3 and do the right thing! Quit stalling and dithering! And don't ignore the huger negative effect that sacrificing Paradise Ridge would have on the natural environment and plant/animal resources of value.	Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-7 and Weather-8 regarding the validity of the Safety Analysis and the Weather Analysis. General Response Weather-3 describes the relationship between elevation, temperature and ice for the action alternatives. The alternatives would not directly affect Paradise Ridge but would be located along its base. General Response Weeds and Wildlife discuss impacts to vegetation and wildlife in proximity to Paradise Ridge respectively. General Response Safety-2 explains how wildlife collisions were considered in the Safety Analysis. General Response Safety-6 explains the significance of the differences in length and safety between alternatives. See General Response Displacement-1 for a clarification on residential and business impacts. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-101	Ted	Allegri, Jr.	Dear ITD, thank you for the fine work all of you have done to bring this road to fruition! In spite of some who oppose the E-2 route, I, and most people I talk to, consider E-2 to be the best, safest, most logical choice. In my humble opinion, E-2 would be straighter and have a more consistent elevation profile. This would lead to better safety and a consistent weather impact.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			There are many opposed to E-2, but their arguments seem founded only in hysteria and emotion. To say we have a "Great Palouse Earthworm", which has never been seen, that needs protection, is absurd. They continue to beat the "weather/fog" drum – without understanding and taking a serious look at what research your people did on this issue. C-3 would have the most dangerous weather impact issues for numerous reasons. It would still be a windy, partially shaded icy areas, with several elevation changes. I'm also not buying into the animal/ungulate travel equation that the opposition wants to bring up. Any of these animals will still travel from point A to B—they will have to cross a road somewhere. That is part of driving in the northwest. You are safer with a route like E-2 where your field of vision would be much greater, giving you an opportunity to avoid animal encounters. Not so on a narrow route with limited peripheral vision like C-3. I am disappointed that these people in opposition to E-2, have cost us so many lives, money, and time. We could have a nice safe route clear to Worley by now, saving many lives, injuries and property loss. I do realize they have a right to be heard. Well, they have been heard, they are in the minority and now, they need to sit down and be quiet. They are depriving we, the majority, our right to a safe road. Keep up the good work. If I can be of any assistance, do not hesitate to call me at 509-330-0907.	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. General Responses Safety-3 and Safety-6 provide information regarding the updated Safety Analysis. General Response Wildlife discusses the alternatives' effects to the vegetation and wildlife on Paradise Ridge including the giant Palouse earthworm. The giant Palouse earthworm is not federally listed or proposed under the Endangered Species Act; however, the species is considered in the assessment of impacts in Section 4.8. General Response Weather-3, Weather-5, and Weather-6 describe the differences in elevation, temperature and ice, fog wind between alternatives. Snow accumulation is discussed in General Response Weather-4. General Response Safety-2 addresses how wildlife collisions were considered in the Safety Analyses. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			Sincerely, T. H. Allegri Jr.	
H-102	Steven	Basoa	I am writing in support of the W4 alignment. I believe the W4 alignment is far superior to the other proposed routes. The two negative aspects of W4 are that it is a slightly longer route and impacts more prime farmland. Despite these two negatives, this route is still a wiser choice than the other alignments. C-3 is bad primarily because it would displace too many homes and businesses (but at least the engineering disaster that is Resienauer Hill would be fixed). E2 is another story altogether. It is the absolute worst choice because of it's altitude and exposure to the weather, as well as the proposed 5% grade which is totally absurd and unnecessary. Although this route would be straighter, it would be more dangerous. The straighter the road, the faster the driving, no matter what speed limits are posted. Even though the weather would be similar on all three proposed routes, the weather impact on E-2 would be greatly enhanced. There would be fog, ice and drifting snow on such an open and exposed roadway. The impact from the high winds would be more intense since there would be nothing to slow them down. I certainly wouldn't want to be driving a semi-truck up there during the winter. The weather survey that was done for this stretch of the project is rather disingenuous. Yes, it suits your (ITD) needs, but it is an incomplete study and very flawed. You have had eight to ten years to truly study the impact of weather, yet your study	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. For clarification the Modified W-4 Alternative would impact more prime farmland than C-3 but slightly less than E-2; however, it would impact more actively farmed and highly productive farmland as stated in the DEIS Section 4.3. All alternatives would upgrade the road to less than a five percent grade to meet AASHTO standards near Reisenauer Hill as explained in General Response Safety-5. General Response Displacement-1 offers clarification of residential and business impacts. General Response Weather-3 describes the relationship between elevation, temperature and ice for the action alternatives. General Response Safety-4 provides an explanation of the effectiveness of reduced speed limits and driver behavior. General Response Weather-4, Weather-5, Weather-6 describes the differences in snow accumulation/snowdrifts, fog, wind, between alternatives. General Response Weather-2 and Weather-8 explains the validity of the referenced data set and the Weather Analysis.

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			only entails a five month period of one mild winter. The fact that the month of December was not included in these five months points out how seriously asinine the study is. The month of December is quite often the wildest month, weatherwise, on the Palouse. If you were truly serious about safety then you would have done a better job with this part of the research. You should really be ashamed of yourselves for passing off this study as a valid piece of work. Then we have the ungulate problem. The moose population on Paradise Ridge is growing. They should not be much of an issue on the proposed lower routes, but they will be an issue on E-2, especially when the highway cuts them off from their watering holes. Have you ever seen the impact of a moose and a vehicle going 55 miles an house or faster? It is not a pretty sight, and it is usually a fatal one, both for the moose and the occupants of the vehicles involved. I hope you find it in your collective hearts to do the right thing and keep the new highway off Paradise Ridge. We, the residents of Latah County, will be the ones who drive the highway the most, we will be the ones most impacted by your decision. We do not want to live with your mistakes. Please do not make this one of them. Thank you. P.S. Included, please find three photos, taken from the Internet.	If the E-2 Alternative is selected, impacted water sources would be replaced on the east side of US-95 as practicable. Most wildlife collisions result in less severe crashes compared to other crash types. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analysis. General Response Weeds and Wildlife discuss the alternatives' indirect effects to vegetation and wildlife on Paradise Ridge. None of the action alternatives would be located on Paradise Ridge, but the E-2 Alternative would be located along its base.

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H-103	Gerald and Judy	Reisenauer	It's time to "Git 'er done"! We attended the ITD Thorncreek to Moscow informational meeting on January 23, 2013 Our compliments to ITD for a well-prepared program presenting all options with impartiality and facts supporting the preferred alignment. Thank you for the opportunity to comment. We prefer Alignment E-2 and the following are our observations: Wildlife—is everywhere. We drive Hwy 95 locally and northbound often. Wildlife/vehicle collisions are evident all along the route. There was a moose in our backyard a couple of years ago and two unfortunate deer in our driveway last fall. A non-issue. Safety—E-2 with fewer access points as opposed to C-3 with numerous access points would be safer. W-4 would have fewer access points, however, affecting prime agriculture resources. We all value safety.	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the travelling public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Schedule regarding the environmental process and the anticipated schedule. See General Response Wildlife and Safety-2 regarding wildlife and how wildlife collisions were considered in the Safety Analyses. The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. Farmland effects are discussed in the DEIS and FEIS Section 4.3. As stated in the DEIS, the E-2 would impact more prime farmland soils but less highly productive farmland compared to the Modified W-4 Alternative.

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			Native flora and fauna—Paradise Ridge flora and fauna have already been corrupted by punching roads and building numerous homes with the infrastructure needed to support these residences. A non-issue. Weather—If it is a mild winter along alignment E-2, it is a mild winter affecting C-3 and W-4. Likewise, if it is a severe winter, it equally affects C-3, E-2 and W-4. A non-issue. It appears to us that the Paradise Ridge Coalition is insensitive to their neighbors and fellow citizens, all dealing with this project which will affect many. Translation—Not in my back (front) yard. It takes a lot of courage to support a project, E-2 that will result in the loss of one's home (the trailer court on Eid Road) for the benefit of the greater community. Conspiracy—This highway improvement from Lewiston to Moscow was put forth by former Governor Kempthorne as "Connecting Idaho". Of course the timber industry and all entities using Highway 95 have an interest in this project. Industry, tourism and a pleasant driving experience would benefit all. A ludicrous supposition. Anywhere you drive in northern Idaho there is beautiful scenery, and topping any hill provides a stunning panorama of the rolling Palouse hills, the northern Idaho trees, green fields in the spring and golden fields in summer. Some of this agriculture will also be impacted by this project. Paradise Ridge is not the only "gem" in northern Idaho Right-of-way—We agree with one gentltman who	Information has been added to the FEIS Chapter 6, Indirect and Cumulative Effects, regarding the effects to Palouse remnants and Paradise Ridge from the project in combination with past, present and future private development. See General Response Weeds and Wildlife. See General Responses Weather-2, Weather-3, Weather-4, Weather-5 and Weather-6 regarding elevation and weather related road conditions. See General Response Displacement-1 for a clarification on residential and business impacts. Right-of-way is based upon design elements in the typical section. See FEIS Section 2.4.2. Visual quality and farmland are discussed in the FEIS Section 4.11 and 4.3 respectively.

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			expressed concern about the amount of right-of-way taken. It does seem a bit excessive. The four-lane highway from Lewiston to Thorncreek looks like it has always been there and belongs. Whatever alignment is selected will be too. Gerald and Judy Reisenauer	
H-104	Don H.	Blair	As a kid, I grew up on Paradise Ridge in the 60's and 70's. I have EI the numerous houses built on Paradise Ridge as a greater threat to the environment than rerouting Hwy 95 to the ITD's proposed route E2. I'm also in the affected area of route C3, given the pro's/con's of the 3 options, I support E-2. I also drive to Lewiston 3 times a week and the traffic accident statistics don't lie. In the last 2 years I have not seen any accidents between Thorncreek Rd and Lewiston, however, I have seen numerous accidents between Thorncreek Rd. and Moscow. It is obvious, build route E-2 now!	Supplemental information regarding residential and commercial development has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. See General Response Weeds and Wildlife. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Responses Safety-3 and Safety-6 describe the safety benefits for the alternatives. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-105	Rodney and Shelley	Dale	My wife and I are in favor of the E-2 alternative. It is the least disruptive to homes and businesses and would be least disruptive to traffic flow on S.R. 95 during construction. Right now, there are two things that must be done to help prevent further accidents. 1. Slow the traffic down on the Thorncreek section to Moscow. Lower the speed limit in this 7 mile section to 55 or even 50. 2. Make it a "no-passing zone for northbound traffic on the northside of Reisenauer Hill at the passing lane for the southbound traffic. As far as we can tell those that oppose this route	The residential and business impacts for the alternatives that were carried forward to the DEIS are clarified in General Response Displacement-1. See General Response Safety-4 regarding lowering the speed limit and other improvements to the existing US-95 alignment. As you mentioned, the E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants.

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			either live on the hill and don't want the highway near or have never looked at the map —The route is not at top of the Ridge—or they think worms and a few animals that may or may not be impacted by this project are more important than people—their lives, homes and livelihood. We value all of it –have done some research and thin E-2 is the best!	
H-106	George	Alderman	E-2 the way to go. Reasion one of three is it is the best way and makes more since. Reasion 2—thoes people on the hill are so set on disturbing the looks and also killing certain plants and bothering animals, what did they think when they built their houses up there. Reasion 3, look at the accidents and deaths that have happened do to the highway not being finished. Do you suppose that bothers those people any? go E-2.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. ITD provided additional information in the FEIS Chapter 6, Indirect and Cumulative Effects, which describes in more detail the effects of the project as well as existing and future private development to wildlife and plants. The E-2 Alternative would offer the greatest safety benefit as explained in General Responses Safety-3 and Safety-6. See General Response Schedule regarding the environmental process and the anticipated schedule.
H=107	Susan	Strout	excellent public hearing, lots of info – Thanks (1-23) I support C-3 after listening to all the experts, looking at their charts and asking questions. I would like to impact Paradise Ridge, Palouse	The E-2 Alternative would not go over Paradise Ridge but would be located along its base. It would not directly affect any Palouse remnants as explained in General Response Weeds. See General Response Wildlife for information

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			worm, Prairie grasses as little as possible. Of course I want safety for all of us and I think with all the additions—4 lanes, 34 ft dividing median, less steep grades etc. that C-3 will be our best choice. Thanks for listening, Sue Strout	regarding the Giant Palouse Earthworm.
H-108	Steven	Barr	I am writing this letter of endorsement with my full hearted support of the E-2 route for Highway 95 from Thorncreek Rd. to Moscow. The ITD should be commended for their extensive and detailed studies of the Highway 95 corridor and the research required to compile such a comprehensive 2,000 page document (EIS). I strongly urge the ITD to move forward with the project without further delays—E-2 is the safest route, the cheapest route as far as construction costs, and it would benefit the entire community with shorter commutes and it would save most of the homes and businesses that would otherwise have to be displaced by the other alternative routes. My history is I am a native resident of Idaho—born and raised in Moscow. For 59 years, I have lived most of my life in this community; or on the Palouse including Uniontown. I have traveled Highway 95/Thorncreek Rd. commuting to Uniontown or Lewiston and I have seen the accidents with people passing on Reisenauer Hill going too fast either up the grade or down (north side) and losing control on snow covered or icy roads. Reisenauer Hill is a disaster and E-2 eliminates that route entirely. We need a safe and	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The Safety Analysis has been revised since the DEIS was published but the findings remained valid as shown in General Response Safety-3 and Safety-6. See General Response Displacement-1 for a clarification on residential and business impacts. See General Response Safety-5 regarding improvements to Reisenauer Hill. Ice and snow are discussed in General Response Weather-3 and Weather-4 respectively. Information has been added to the FEIS Chapter 6, Indirect and Cumulative Effects, regarding the effects to Palouse remnants and Paradise Ridge from the project in combination with past, present and future private development.

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			efficient highway to move people and commerce. This is not about preserving Palouse Prairie with most of Paradise Ridge privately owned and some 50+ residences already there as established dwellings. The issue and prime consideration in my mind is safety—creating a 4 lane highway moving people and commerce efficiently and safely. E-2 provides this with a gradual slope and a wonderful south entrance into Moscow. E-2 also has the fewest access points of the three proposed routes. From my personal observations I have also experienced being blinded by the setting sun as one travels NW on 95. I assume most of the hillcrests will be graded or cut for C-3, but the alignment and direction is still a concern to me when traveling at that time of day. E-2 I believe would not have this problem. Back in March of 2006 I fell on black ice and broke 2 vertebrae in my neck. Winter weather, snow and ice are a part of living on the Palouse—the vehicle one chooses more often than not is either all wheel or front wheel drive. We need a safe roadway for these conditions and C-3 is not it. C-3 is the least safe, most disruptive, and has the most access points of the alternatives! I am a homeowner in Moscow for the last 23 years and I believe the E-2 route would benefit the entire community including businesses. More and more people are commuting to Lewiston or to Moscow or Pullman to work. Since I was a child they have talked about a north/south highway connecting all of Idaho. Let's get this done!! Move	See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants. General Response Weather-3 and Weather-4 describe the difference in elevation, ice and snow accumulation for the alternatives. The action alternatives would have Expressway Access Control as explained in General Response Access. During design, ITD will work with landowners on specific right-of-way needs. See General Response Access. Mitigation measures for impacts to the human and natural resources are described in FEIS Chapter 9, Environmental Commitments. Signage, pullouts, and wildlife crossings are included in the mitigation measures. For clarification, the E-2 Alternative would not go over the ridge but would be located along its base.

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			forward, the studies have been done and analyzed and E-2 has been chosen by ITD as the best route. If there is dissent, let's mitigate and purchase additional land that would benefit the Palouse Prairie on Paradise Ridge. Why not provide signage to educate people or even provide a pull out with a kiosk or interpretive display or plant demonstration area?? Let's make it a win/win for all parties concerned. How about narrowing the right-of-way for less of an impact on the ridge?? How about providing a vegetative buffer to minimize noise and visual impact to residents of Paradise Ridge?? If there are concerns about wildlife crossings then provide a point where wildlife can move safely. 12 years is long enough ITD needs to move forward with this project and compensate those individuals who will be affected by the impact of its construction. People need to get on with their lives and not have to worry whether they are going to be displaced. We need a safe highway to stop or curtail the accidents that seem to be happening with greater frequency. E-2 by limiting access and intersections, will provide that safety and a more pleasurable easier commute. As a resident of Moscow, I whole heartedly support ITD in their choice of E-2 as the preferred route of Hwy 95 from Moscow to Thorncreek Rd. Sincerely, (signature)	
H-109	No Name	–	Mr. Brian Ness, Director ITD: If you don't want to be politically raked over the coals (and maybe even prosecuted as well), you	FHWA and ITD are committed to implementing the NEPA process and evaluating the impacts of a range of reasonable alternatives. We understand

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			might want to examine the sins of your predecessors, as well as the continuing fraud and deception at ITD and in the greater GOP community. This whole scene will get the attention of investigative journalists and then eventually prosecutors. How will you look? This all started well before your watch. You don't need to go down with it. Talk to the Governor and the A.G. about this.	that during this process, not everyone will be satisfied by the decisions; however, FHWA and ITD must balance the human and natural effects with the public's need for a safe and efficient transportation system. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
H-110	LeNelle	McInturff	I have driven U.S. 95 from Eid Road to Moscow five days a week for over 30 years. My overriding concern with the current highway is safety. I strongly support moving U.S. 95 to the E2 alignment. It eliminates the dangerous curves of the current route. It provides a more consistent elevation which will result in more consistent road conditions: no more treacherous changes from wet pavement in the low area to ice on the curves and hilltops. E-2 also requires fewer access points which will result in less congestion. As to weather concerns, in my experience the fog often seen hanging over Paradise Ridge is actually further up the ridge than the proposed E-2 route. Recently I was headed south out of Moscow and sure I would be in heavy fog as soon as I topped the hill at Johnson's Trucking. The fog was actually far from the highway and even above the E-2 alignment and Reisenauer Hill. Look south from Moscow, the view of fog on the Ridge can be very deceiving. Strong cross winds on the proposed E2 route have been listed as a concern by some. I	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would offer the greatest safety benefit as explained in General Responses Safety-3, Safety-6 and the Revised Safety Analysis. Elevation, fog, wind, and other weather conditions in the study area and on Paradise Ridge are addressed in General Response Weather-3, Weather-4, Weather-5 and Weather-6. All displaced businesses and residents will be compensated and relocated according to the Uniform Relocation Act. Residential and business impacts are clarified in General Response Displacement-1. See FEIS Appendix 5 for a summary of the Uniform Relocation Act. The project will not be constructed over on any Palouse Prairie remnants but may have indirect effects due to weed dispersal as described in General Response Weeds.

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			wouldn't expect winds on the new route to be any worse than the strong cross winds I have experienced coming in and out of the cuts on the current route, and the new wider highway will provide for a larger margin of error/drift in windy conditions. I trust that homeowners in the direct path of E-2 will be fairly compensated for the loss of their homes. I also trust that reasonable efforts will be made to limit damage to the small amount of Palouse prairie impacted. Wildlife will be trying to cross the highway no matter which route is taken. I have thankfully avoided collisions with deer at several locations on the current route but have seen the evidence of less fortunate animals and drivers all along the way. Since I live on Eid Road, I won't have direct access to the E2 alignment, but I would expect that the current stretch of US 95 will be suitably maintained for those of us who will still need to use it. When road conditions and visibility are poor, driving is easier and safer on a straight level stretch of road than on a stretch with hills, curves, and many side roads. I hope the E2 alignment can be approved and construction can begin without further delay.	See General Response Wildlife and Safety-2 regarding wildlife movement and wildlife collisions. See General Response Maintenance-1 regarding the maintenance of the existing US-95 segments. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
H-111	Jim	Dahmen	I would like to recomed that the E-2 Easter Alternative route be awarded for construction. It is the only route that elimanates the steep down hill north side of Reisenauer Hill. As stated "safety first". It would also be the straightest and shortest. We are building a highway for the future and	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Wildlife mitigation measures including crossings are described in General Response Wildlife and FEIS Chapter 9, Environmental Commitments.

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			common sense say's E-2 is the one. Also crossing's for wildlife could help. I have great faith in all of the research done, that I.T.D. will choose E-2 as the road of the future. See General Response Safety-5 regarding Reisenauer Hill.	
H-112	Leonard T.	Hetsler ("Len")	Kudos to ITD personnel for their years of time and effort in design, public relations and physical presence in Moscow. The three alternatives appear well designed and creatively presented; all would be defensible. After reading community comments and spending time "on the ground" in the C-3 and E-2 areas, my support goes to the E-2 alternative for the reasons stated by ITD. I would hope that selection of E-2 would free up the existing Highway 95 roadway for safer travel by locals who may also opt to upgrade their properties and build a quieter rural community after years of traffic noise and disruptions. Because Paradise Ridge is a substantial community of more than fifty homes, some residents of which will face disruption with E-2's selection, perhaps ITD will find the means and methods to mitigate the noise near homesites. Techniques such as tree and shrub plantings and the prohibition of "jake brakes" come to mind. If appropriate, underpasses could make crossings safer for animals. As one who has lived not far from Highway 95 north of Moscow for more than three decades, I know that road noise can be intrusive, and even the sound of the wind through the trees can make life more pleasant.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. ITD revised the Safety Analysis to include the predicted safety on the existing US-95 segments should an action alternative be selected. See General Responses Safety-3 and Safety-6. Maintenance of existing US-95 is discussed in General Response Maintenance-1 and Maintenance-2. Due to less traffic on the existing US-95, the traffic noise levels will also be lower. The E-2 Alternative would bring traffic closer to homes on Paradise Ridge but there would be less braking due to the more level grade reducing the need for jake brakes. ITD will be working with landowners during the design process and will minimize vegetation removal where practicable. The function of vegetation for noise reduction is minimal compared to walls or berms; however, they may offer a visual shielding effect. See General Response Wildlife and Chapter 9, Environmental Commitments for a description of wildlife mitigation. General Response Schedule describes the next steps in the environmental process and the

#	First Name	Last Name	Comment	Response
			I am looking forward to a safer highway and an "awesome" entry into Moscow from the south.	anticipated schedule.
H-113	Robert W.	Haun D.C.	Could we please have a straight road into Moscow I believe E-2 was that route. It makes the most efficient pathway Least cost to build, straight, less energy to drive, looks to be the safest route. How could you go wrong.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Safety-3 and Safety-6 provide updated information from the Revised Safety Analysis and results from the Mobility and Road User Cost Study. The E-2 Alternative would still offer the greatest safety benefit and would be the shortest alternative.
H-114	Nora	Locken	I would suggest that ITD reconsider the benefits of C-3. There are a number of positive elements that should be given significant weight: 1) less right-of-way would need to be acquired; 2) fewer wildlife and native plant areas would be impacted; 3) the mid-level (as compared to E-2 or W-4) elevation would be beneficial since it would not be the coolest location (W-4) and also would lie below the fog line (E-2); 4) It is only .1 miles longer than E-2, so nearly the same distance; 5) safety would be improved greatly by eliminating the risk of head on traffic collisions by making this improvement to the current roadway and dividing traffic lanes. The weather study included in the draft EIS was greatly lacking any information that pertained to C-3. Weather points to the east and west were examined, but nothing in the center, only the RH point which is included in W-4, C-3 and E-2. Also the high fog months of Oct., Nov. and Dec. were not included in the study. C-3 has a number of positive aspects and though	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Clarifications are provided to specific numbered points that correspond to your comment. 2. See General Response Weeds and Wildlife regarding effects to plants and wildlife on Paradise Ridge. 3. General Response Weather-3 describes the relationship between elevation, temperature and ice for the action alternatives. Fog is discussed in General Response Weather-5. 4. See General Response Safety-6 regarding the significance of the difference in alignment lengths and safety. 5. The Safety Analysis has been revised since the

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			no plan is perfect, this appears to me to be the best choice. (Signature)	DEIS was published but the findings of relative safety between alternatives remained valid. See General Responses Safety-3 and Safety-6. General Response Weather-1 describes how the C-3 Alternative was considered in the Weather Analysis. General Response Weather-2 clarifies the validity of the five-month data set.
H-115	William T.	Gibson	Environment: All environmental agencies (especially Idaho Fish and Game strongly recommended against alt. E2). The Palouse Prairie is vanishing and the largest piece of acreage is next to E2 route. Alt C3 has the least wetlands. Safety: Any studies extrapolating data points below the ridge are unreliable. The wind gusts are dangerous both from the East and West. I have measured gusts in excess of 80 mph yearly. My roof was affected and needed repair 3 times due to these gusts. I know of no scientist that is reputable that would only sample one year. Trucks without loads ("dead-heading") would be at risk. A 6-7% grade will probably result on E2.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Agency-1 regarding the difference in opinion regarding ITD's and FHWA's Preferred Alternative. The E-2 Alternative would not directly impact any Palouse Prairie but it would be closer to identified Palouse remnants. See General Response Weeds. See General Response Weather-2 regarding how the 5-month data set relates to the larger 30-year data set. See General Response Weather-3, Weather-34 and Weather-5 regarding the elevation, wind, fog, and other weather conditions. The maximum grade for all action alternatives including the E-2 Alternative would be five percent as stated in the DEIS and FEIS Section 2.4. See General Response Safety-5 for improvements to Reisenauer Hill.

#	First Name	Last Name	Comment	Response
Email Comments (received between January 4, 2013 and March 25, 2013)				
E-1	Alison	–	Hi, I heard that there will be a hearing on this project soon and am trying to find out the date/time. I appreciate any info you can offer. Thanks! Alison	Per your request, information regarding the date, time and location of the hearing was sent to you by Ken Helm on 12/31/12. Future updates and project information will also be available on the project website at: http://us95thorncreek.com.
E-2	Amy	Conway	I have been following the plan and discussion for the proposed changes to US 95 from Thorncreek Road to Moscow. As a newer resident to Moscow, this is my first opportunity to comment on this project. No doubt, many of the accidents are due to drivers traveling too fast for the road conditions (winter), inattentiveness, or both. I encourage ITD to address the safety concerns FIRST by implementing safety measures that do not require re-routing the highway. These could include more signs, perhaps flashing lights, rumble strips, etc. I am sure that warning folks to slow down for conditions and for the more steep, curvy section would help and be more cost effective than re-routing the highway. Due to the higher elevation and winter weather concerns, please do not adopt the proposed route to the East. Moving the road to a higher elevation will increase the risks due to frost and ice on the road. Use of the central option (closest to the existing road) seems to have the least environmental impact (saves forest and wildlife habitat). If you must	A revised Safety Analysis was prepared and is summarized in the FEIS Chapter 1 and Section 3.10 and 4.10. See General Response Safety-4 regarding small safety improvements on existing US-95. See General Responses Weather-3regarding elevation and weather related road conditions. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			change the route, please adopt this route. Thank you for your consideration. Amy Conway, resident, Moscow ID	
E-3	Ashleigh	Bright	Dear Idaho Transportation Dept., Enough of the buffoonery. I thought you all were joking when you tried to send mega loads up past Jerry Johnson hot springs. That road is sinuous enough to make a Subaru feel like a sports car. Those poor truck drivers were probably terrified. This new idea of destroying final remnants of Palouse habitat with the proposed Highway 95 E2 is all the more senseless. Have you *been* to Idaho? Have you *seen* the difference between a flat stretch in the winter, and trying to drive up or down a mountain in the winter? You stay *away* from hills, mountains, and inclines in general when the snow flies. There's a reason all the hills have names up here - Steakhouse, Risenhauer, Crooks - and it's because of the local epic legends of winter travel. Making it over Saddle Ridge when there is more than 4 inches of snow is a remarkable achievement. Paradise Ridge is no different. Why the hell would you want to route the highway over it? Tree huggers and truckers alike think the E2 option for Highway 95 is completely idiotic. Come to Moscow sometime in the next month- I'll treat you to dinner at Nectar, and drive you around Paradise ridge to show you why you might want to reconsider this silly, silly plan. All the best, Ashleigh Bright	Truck traffic along US-12 is outside of the project's logical termini and is not considered as part of this project. See General Response Weather-3, Weather-4 and Weather-6 regarding elevation, snow and weather-related safety along the E-2 Alternative. The E-2 Alternative would not go over Paradise Ridge and would not directly affect any Palouse remnants but would be located along the base of Paradise Ridge. See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants.

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E-4	Bill	Perconti	IDT:I am writing to lend support of your proposed four-lane divided highway Thorn Creek/US 95. My wife and I have both experienced accidents on this stretch, one serious, that would have no doubt been avoided or lessened considerably had the highway been a four-lane divided. Having lived in this area for 25 year, I've always wondered why Idaho is the only state of the union that does not have a four-lane divided North/South route. This fact is especially damming considering that Idaho is a vertical state! I've also wondered what the benefit of such a highway would be to the Rt 12/Lochsa River corridor. A divided four lane N/S route in Idaho would give truckers a more economical and convenient route to C'DLane and US 90, and to Missoula. Truck traffic along the Lochsa River, a potentially dangerous route, should be lessened. Above all, safety first to all who travel US 95 should be the main consideration. Let me know if I can do anything else to support your proposal. Bill Perconti	The proposed solution to improve public safety and increase capacity on this section of US-95 is to continue the four-lane divided highway through this section, which will better serve local and regional travel in and through Idaho.
E-5	Dale	Newberry	I would like to write in support of the preferred E2 alternative of the Thorncreek/Moscow US95 realignment. As a recently retired bus driver with Moscow School District I am acutely aware of the safety concerns on this section of highway. I believe the E2 is definitely the best alternative.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3 and Safety-6.
E-6	Dan	Rathmann	Idaho Transportation Dept. Attn: Mr. Ken Helm	See General Response Safety-4 regarding speed limits, signage and turnouts.

#	First Name	Last Name	Comment	Response
			Ref: proposed relocation project – US 95 at ThornCreek/Moscow I look forward to attending the Jan 23 ITD meeting in Moscow. Before then, I request some additional information. This being a high accident area (220 accidents in ten years), I see no signage to warn motorists that this is a "HIGH-ACCIDENT-AREA-USE CAUTION". This being a high accident area, I see no reduction in the posted speed limit of 60 mph, even though the curves have advisory signage of 55 mph. This being a high accident area, I see no yellow flashing lights at locations where the majority of the accidents occurred. This being a high accident area, I see no turnouts for slow-moving vehicles. ITD has collected detailed statistics of the accidents. We would appreciate receiving those details before Jan. 23. That is, of the 220 accidents you have tallied: *How many are attributed to excessive speed? *How many are weather related (ice, visibility)? *How many occur in the northbound direction, with vehicles recently coming off the four-lane stretch? *How many involved only a single vehicle? *How many were classed as DUI, or asleep, or inattentive? Thank you Dan Rathmann Moscow, ID	The DEIS Safety Analysis Appendix A.1 contains a list of all 220 crashes. The list shows if excessive speed was a contributing factor, whether the crash was weather related, which direction of travel the vehicle was traveling, whether the crash was a single vehicle crash, or if the driver was alcohol impaired, inattentive, or fatigued. The Revised Safety Analysis also contains updated similar information in its Appendix A.1.
E-7	Debi	Zenner	I have been driving this road to/from work (Genesee/Moscow) for 23 years. I would prefer the	The proposed alternatives will all improve safety of US-95 and Zietler Road. The E-2 Alternative would have the

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			E-2 Route. It appears to me, to be the very best choice. The stretch of road from Eid to Moscow is treacherous in the winter and I've seen more accidents in that area than any other….thank God, none of them were me! Zeitler area is, by far, the worst part of the road and it will be wonderful not to have to drive the two-lane from Thorncreek to Moscow. This will also be helpful in the summer, during harvest. Thanks for asking input. Debi Debi Zenner, Administrative Assistant International Programs Office-1250 (208)885-7084; (208)885-2859-Fax debiz@uidaho.edu<mailto:debiz@uidaho.edu> http://www.uidaho.edu/international	greatest safety benefit. See General Responses for Weather regarding winter driving conditions for each alternative. Supplemental weather data and snow accumulation data information has been added to the Revised Weather Analysis.
E-8	Del	Hungerford	Hi Ken, I'm reading over the DEIS document and have a question about the homes in Benson/Clyde Mobile Home Park. Everything is saying that only five of the mobile homes will be affected. There are six units so which one will not be affected? In the noise impact survey, it listed 1071 Eid Road #2, #5, #7, #8 and #9 but not #3 (which is my home). So, if I'm reading this correctly, only one home will be left in the 1071 section of Benson's Park? It also doesn't mention the original Benson house that's directly across from the homes at 1071 Eid Road. And, it appears that most of the information about the residents was gathered before I purchased my home so at some point, will we need to clear that	See General Response Displacement-1 and Displacement-2 for clarifications of residential and business impacts and the Uniform Relocation Act. The five mobile homes that you noted would be impacted. Your home (1071 Eid Road #3) and the original Benson house would be potentially impacted meaning the E-2 Alternative's cut and fill lines do not intersect your property but would be close. Residential impact information as it pertains to noise was updated in the FEIS Sections 3.12 and 4.12. A typographical error was corrected. 1971 Eid Road was changed to 1071 Eid Road #3 in the FEIS. The same correction was made to the Traffic Noise Technical Report (2015a), and the Community Impact Technical Reports through an addendum and errata sheets. The

#	First Name	Last Name	Comment	Response
			up? The report says that many living in our park are students, which is no longer true. In fact, I don't think any students live in any units of the Benson Park any longer. Maybe this doesn't matter but I thought I'd at least mention it. I don't believe this is information that needs to be asked at the hearing on January 23rd so I hope that you don't mind me asking sooner. To me, these are questions that can be asked in advance. Thanks for helping me understand this more. Enjoy the snow. Ms. Del Hungerford 1071 Eid Road #3, Moscow, ID 83843 208.210.1344	information regarding the residents along Eid Road was deleted in the FEIS Section 4.1.
E-9	Del	Hungerford	Last question. I think my address is listed but it's wrong. On table 57--- page 183 (Predicted noise effects), I think that my place is listed as 1971 Eid Road. It's showing that receptors 7 and 13 are in Benson Mobile Home Park and won't be displaced. Receptor #13, which is 1084 Eid Road (the Zeigler's house) is NOT in Benson Mobile Home Park; it's across the street from the park. I think that 1971 Eid Road is a typo and should be listed as 1071 Eid Road #3 because there is no 1971 Eid Road that I know of. Even if there was, it would be much further west than Benson Mobile Home Park. Again... This is information that you should probably have before the meeting. I don't want to waste everyone's time listening to me point out some discrepancies in the document... Plus, I need to know this information BEFORE the meeting so I	Your address was corrected in the FEIS Section 3.12 and 4.12. See General Response Displacement-1 for a clarification on residential and business impacts. ITD will work with landowners during the right-of-way process to find engineering solutions to minimize visual impacts. See FEIS 4.11 regarding visual effects of the alternatives. ITD will work closely with landowners during the design and right-of-way process to further minimize harm.

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			know how to plan what I'm going to say AT the meeting. Make sense? Thanks again, Del Hungerford – Hi Ken, Thanks for the quick response. I will be at the meeting. I just wanted to save that time for more relevant questions. I will say that the thought of looking out my door toward a very tall overpass would be a huge concern. And the thought of a truck missing a turn and rolling down an embankment into my house leaves me with a bad picture. And, I would lose my neighbors. You've been most helpful. Del Hungerford	
E-10	Delitha and Dwight	Kilgore	Hello Ken: We have reviewed most of the documents in the EIS at the Lewiston Public Library. It appears that the review is thorough and we don't know what else you can do. Our preference is the Eastern Route. Nothing you do is going to please everyone. You have done the best you can and now it is time to make a decision and move forward. It is time to start saving lives on that stretch of highway. Again, we hope the Eastern Route is selected. Please enter this into your public comment record. Delitha and Dwight Kilgore 3225 8th St. E, Lewiston, ID 83501 (208) 743-8873 1/10/2013	See General Response Schedule for a description of the next steps in the environmental process and the anticipated schedule.

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E-11	Donald G.	Sinclair	Adam Rush, I am not sure I will be able to attend the hearing, so I am emailing my comments. I agree with the ITD's preferred alternative (E-2) for the reasons stated in the Impact Statement: a) MOST IMPORTANT--it is the SAFEST route. b) It has the fewest access points. c) Shortest travel time. d) Least impact on streams. e) Avoids businesses. I know there are people who oppose this alternative. Perhaps they can be persuaded to invest in some trees instead of lawyers. Donald G. Sinclair 2844 Hwy 95 South, Moscow, ID 83843 (206)931-7515	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3 and Safety-6. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. See General Response Displacement-1 for a clarification on residential and business impacts. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
E-12	Del	Hungerford	Hello Idaho Transportation Department, Although I've been e-mailing Ken Helm with some questions, I also wanted to be sure some information was put in writing, even though I do plan to attend the meeting on January 23rd. Some of this information, you may want to know before the meeting because there are some typos in the DEIS document that once cleared up, will make more sense and will also help me plan for what to say in the meeting. I think my address is listed but it's wrong. On table 57--- page183 (Predicted noise effects), I think that my place is listed as 1971 Eid Road. It's showing that receptors 7 and 13 are in Benson Mobile Home Park and won't be displaced. Receptor #13, which is 1084 Eid Road (the Zeigler's house) is NOT in Benson	The revisions to the addresses, occupancies and specific information about the mobile home park have been clarified using errata sheets for the Community Impact Technical Reports and the Noise Analysis Technical Report and in the FEIS Section 3.12 and 4.12. See General Response Displacement-1 for a clarification on residential and business impacts. ITD will work with landowners one-on-one during the right-of-way and design processes to explore engineering solutions that may minimize visual or other proximity impacts. Landowners will be compensated according to the Uniform Relocation Act see the FEIS Appendix 5. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative

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			Mobile Home Park; it's across the street from the park (NORTH side of Eid Road while Benson's Mobile Home Park is on the SOUTH side of Eid Road). So, there are six receptors in Benson's Mobile Home Park (1071 Eid Road #2, #3, #5, #7, #8, and #9) 1084 Eid Road is the original Benson house (stick house). I believe that 1971 Eid Road is a typo and should be listed as 1071 Eid Road #3 because there is no 1971 Eid Road that I know of. Even if there was, it would be much further west than Benson Mobile Home Park. Additionally, in the noise impact section, it says that both receptors #7 and #13 will be affected but at this time, there's no plan to "wall off" the noise. From looking at the rendering of the bridge over Eid Road, every time that I go out my front door, I'll be looking up this gigantic hill with an overpass and bridge at the top of it. If there's no plan to deal with the noise, why leave us? – I used to live north of Viola, Idaho (about 500 feet from the center line) of Highway 95. I will have to say that living next to Highway 95 was horrible. Every time a trucker came by, he'd set off his "Jake brakes" and it would shake the house. This happened every night and woke me up every time. After a year of that, I had to move. So, I can't imagine the noise from this version of the highway would be any better, especially since I'm listed as one of the residents within 300 feet of the center line. The problem this time? I own my property and may	describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			not be able to sell it because who wants to look out and see a highway in their front yard? My neighbors at 1084 Eid Road feel the same. Being so close to this new highway will completely devalue our properties to the point we may never be able to sell them. I totally understand that this road is necessary and that the E-2 is the best route. However, I'm not happy with the Idaho Transportation Department's decision to leave my home untouched. If you're going to move everyone out of our neighborhood, take me, too. I don't have any desire to live next to Highway 95 ever again. There is a lot of other misinformation about the residents in the E-2 route. It appears that much of it was gathered before I moved to my home in 2009. I'm NOT one of the owners who can easily find other housing, as I'd planned to stay here for a very long time. The people who sold me my home failed to let me know that a highway might go through. You can imagine the shock I felt when reading the article in the paper last July announcing the project had been awarded funds to move forward. There's NO mobile home park in Moscow that could provide what I currently have, both financially as well as the ability to run a business out of my home. I've been looking since July for alternatives and so far, what's available in other mobile home parks, would be a HUGE step back AND cost me at least $200 per month more than I currently pay. Plus, my current income level (as an instructor at a university) would make it tough to have an additional $200 per	

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			month payment. I chose Benson's Mobile Home Park for a reason... I love the country setting, the large yard, the low lot rent, that I can store my camper trailer at no extra fee, can run a business out of my home, my neighbors, and the ability to do as I wish to my property. I would lose all of that if I were to move to another mobile home park. (Trust me... I called them all) If I stay, I get to hear "Jake brakes" all night again and look at an ugly hill that leads up to a highway. So, I was NOT one of the residents of Benson's Mobile Home Park that said it wouldn't be a problem to have the highway go through our property. But, they were slated to be moved and I wasn't so maybe no one thought to ask me. Why not? I will look forward to hearing how the Idaho Transportation Department plans to deal with the effects of noise to those remaining 9 residences within 300 feet of the center line for the E-2 route. It doesn't appear that a plan has been developed yet (according to the DEIS) document. Thank you for taking time to consider my comments. I know that you must get hundreds of e-mails, many of them not so pleasant. Please understand that I believe this is necessary and that E-2 is the best route. But, please understand that I simply cannot live that close to a highway again. As a little side note... That group called the "Paradise Ridge Coalition...." see if you can find out how many of them live (or have at one point) on or near Paradise Ridge. They don't want the road for selfish	

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			reasons while people continue to die on the highway. I've known people that have died; some of them children. Bottom line... The re-routing of Highway 95 is necessary. Have an amazing Tuesday while you all prepare for the hearing on January 23rd. Dr. Del Hungerford Profession: Instructor of Music Education, Washington State University Address: 1071 Eid Road, #3 Moscow, ID 83843 E-mail: delh@uidaho.edu<mailto:delh@uidaho.edu> Phone: 208.310.1344	
E-13	David	Hall	The Idaho Transportation Department and Federal Highway Administration have approved a draft environmental impact statement favoring an eastern realignment of U.S. Highway 95 from Thorn Creek Road to Moscow" -- still a bad choice!	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
E-14	Jim	McIver	Comments, I fully support the proposed easterly route for realignment of U.S. Hwy 95 between Thorn Creek and Moscow Idaho. I travel this route frequently and feel this is the best and safest alternative. People with money and houses on Paradise Ridge shouldn't be allowed to dictate ITD policy. Regards, Jim McIver 3527 20th St, Lewiston Id 83501	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3 and Safety-6.
E-15	Jim	Roach	To whom it may concern: I am writing to ask you consider using the western	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking

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			route for the Thorncreek highway project in Latah County. Please, do not use Paradise Ridge as a highway. Some of the last vestiges of native Palouse prairie habitat are here. C'mon, leave the ridge alone. The giant Palouse Earthworm has habitat here as well. The small forest covering Paradise Ridge is vital to the ecosystem and many species use and live here. DON'T RUIN IT!! You want more black ice accidents and subsequent deaths? Put the highway higher in elevation and you'll get just that. Pave the west route. Thank You, Jim Roach 122 N. Cleveland, Moscow, Id. 83843	into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. It would not directly impact any Palouse remnants or Paradise Ridge as explained in General Response Weeds-and Wildlife. Additional information regarding the Giant Palouse Earthworm was added to the FEIS Section 3.8. See General Response Weather-3 regarding elevation, temperature and ice.
E-16	John	Bindl	Hello Adam, Please put my comments into your files, as I am unable to attend the meetings in Moscow, due to health issues. First of all, I would like to thank the ITD for all of their hard work, effort and time, not to mention costs for the in depth studies of the DEIS they have FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. A Mobility and Road User Cost Study was also completed for the alternatives and is summarized in the FEIS Section	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. A Mobility and Road User Cost Study was also completed for the alternatives and is summarized in the FEIS Section 4.10. Additional information regarding occurrences and habitat for the Giant Palouse earthworm was added to the FEIS 3.8 and 4.8. See General Response Weeds-1 and Wildlife-1 regarding Paradise Ridge and Palouse remnants. Additional information regarding indirect and cumulative effects to Paradise Ridge, including private and commercial development unrelated to the

#	First Name	Last Name	Comment	Response
			4.10. Additional information regarding occurrences and habitat for the Giant Palouse earthworm was added to the FEIS 3.8 and 4.8. See General Response Weeds-1 and Wildlife-1 regarding Paradise Ridge and Palouse remnants. Additional information regarding indirect and cumulative effects to Paradise Ridge, including private and commercial development unrelated to the project was added to FEIS, Chapter 6, Indirect and Cumulative Effects. See General Response Displacement-1 for a clarification on residential and business impacts. General Response Access describes that the alternatives would have Expressway Access control, which would reduce access points and development pressures. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.completed in past several years. I totally agree with the E2 route that ITD, FHWA and DEIS show would be the best and favored route to proceed with construction. The reasons I agree with the E2 are listed in your DEIS guide we received in the mail. It is the safest route, along with your study of least effect on environmental conditions and fewest access points of ingress and egress. Also, one of the biggest issues which impact "everyone" that will use this highway is fact that it is the shortest route making it the least expensive to build and in	project was added to FEIS, Chapter 6, Indirect and Cumulative Effects. See General Response Displacement-1 for a clarification on residential and business impacts. General Response Access describes that the alternatives would have Expressway Access control, which would reduce access points and development pressures. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			prefer alternative E2. E2 is less disruptive of local businesses; minimizes residential and business relocation, and the number of remaining homes and businesses that must access the highway directly; results in the least fragmentation of farming operations; best preserves, protects and services the current agricultural practices in the area; and is the least likely to encourage suburban encroachment into some of the best farmland in the northwest. The vast majority of farmers impacted by all three routes agrees that E2 is the best alternative and least interferes with their operations. These residents and property owners overwhelmingly support Alternative E2 because it directly affects their everyday home life. In contrast, most of those that oppose the E2 alternative largely live outside the Study Area, do not own property directly affected by the alternative routes, and are concerned about indirect effects on Paradise Ridge, much of which is on the periphery or outside the Study area. E2 is clearly the Safest Alternative. It is the straightest, flattest, shortest, least expensive route; with the fewest accesses, and least poor weather conditions. E2 is the only alternative that eliminates Reisenauer Hill, minimizes curves, has the minimum number of accesses and is most favorable for conversion to “no access” status for the next generation of highways. As far as the view goes, anywhere the highway would be built could/would affect someone's view. This should not take precedence over the safety of	

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E-17	Karl	Johnson	Department of Transportation, I would like to register a comment in favor of the proposed Thorn Creek to Moscow improvements. I think this is the best choice and it is time to get on with the project before any more people are killed or injured on the current route. Karl Johnson, Moscow	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
E-18	Kasey	Dennler	I believe that the Eastern Alternative route looks the best, E-2 Thank you, Kasey Dennler	Thank you for your comment.
E-19	Kim	Salisbury	I prefer the safest alternative, the E-2 Eastern Alternative.	Thank you for your comment.

#	First Name	Last Name	Comment	Response
			Thank you, Kim	
E-20	Kristin	Johnson	Dear Ken, Thank you for allowing comments regarding the proposed eastern route for U.S. 95! YES!! Please replace the current Goat Trail! My husband and I travel in that road very often to visit my parents who live in Clarkston, WA. Some of those corners are pretty sharp and the two-lane head-on traffic is indeed very dangerous, especially in the wintertime when it is icy and slick. My boss travels every day from Lewiston to work in Moscow. It is often a frightening experience. We would love to see this project move forward without any further delays. We cannot afford any more deaths or injuries of our neighbors and loved ones. You have our enthusiastic "thumbs up" for proceeding with the project as proposed and as soon as possible. With kind regards, Kristin Johnson, Moscow	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Responses Safety-3 and Safety-6. General Response Weather-3 describes the relationship between elevation, temperature and ice for the action alternatives. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
E-21	Karen	Parvin	The completion of I 95 to Moscow is a much needed highway improvement and DOT has already done an awesome job on the first part of the project: top of the hill to Thorncreek. My opinion on this next portion is to create a highway that has the most functional efficiency in getting traffic past Moscow north/south and from/to Pullman to north, east, south of Moscow. Keep the hundreds of autos commuting to work from Idaho to Pullman out of downtown Moscow and off the rural gravel roads.	The option that you mentioned appears to be similar to the Ring Road concept that is being proposed by the City of Moscow. The Ring Road concept and the alternatives' consistency with that concept has been clarified in the FEIS Sections 3.2 and 4.2.

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			I feel the most functional route as far as traffic goes, is to veer west into Washington state and intersect SR 270 at the stop lighted intersection 1 mile west of Moscow. Create merging exits so traffic can go any direction without stopping. I realize crossing the state line complicates matters in many ways, but if that can be partnered, you would have a functional highway that serves the Moscow area longer than any of us will live. Karen Parvin Donor Recruitment Representative American Red Cross Lewis and Clark Blood Services Region 508 Thain Rd, Lewiston, ID 83501 (208) 798-4613 x1 (p) (208) 791-2011 (c) (866) 798-4613 x1 (tf) karen.parvin@redcross.org<mailto:karen.parvin@redcross.org>	
E-22	Lloyd	Mues	Date: Wed, 23 Jan 2013 Greetings, I have closely followed the information with regard to the re-alignment of highway 95 and specifically the Thorn Creek Road to Moscow portion, and I feel compelled to provide my personal comments as I sincerely believe that the E2 route to be a much far worse option than the C3 option. I have literally spent thousands of hours (over many years) walking and helping to farm the land in and around that associated with both the E2 and the C3 options and for the life of me, I can't see how E2 is the better course. * The elevation change alone between these two options is a very serious difference in the winter	See General Response Weather-3, Weather-4 and Weather-6 regarding elevation, snow accumulation and other weather related road conditions. The pine stands that your referenced do provide whitetail deer habitat and would be affected; however there is other available habitat in the area as described in the DEIS and FEIS 3.8 and 4.8. See General Response Wildlife and Safety-2 regarding the effects to wildlife and how wildlife collisions were considered in the Safety Analyses.

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			months. During a storm, the C3 option might get three inches of snow and yet the land associated with E2 will more than likely (although just hundreds of feet higher in elevation) receive a foot of snow and with strong winds. This fact is known throughout the Palouse and is no different than what we see in Moscow. As Moscow sits at a slightly lower elevation than the ridge and the difference in snow accumulation is the difference between being able to drive your vehicle on the roads and having to plow the road first at that slightly higher elevation. That difference in height/elevation between C3 and E2 is substantial enough with everything else perhaps being equal, that the C3 option would be much more safe and should prevail. * The C3 option will have much less of an adverse impact on the wildlife. The Ridge is a very special ecosystem and the Whitetail deer population alone venture out into the edges of the pine trees that the E2 option would invade. And just the presence of the highway that close to the edge of the deer habitat will reduce substantially the deer habitat associated with the Ridge. We don't have that many pine trees on the Palouse to begin with and the E2 option will take out some of that ecosystem and force the deer and the rest of the wildlife to recede even further up the ridge and into what pine and brush habitat is there; however, it is obvious that the deer range will be more adversely impacted with E2 than the C3 option. * The E2 and C3 options join together in South Moscow at approximately the same location and	

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			both are relatively straight roads from the vicinity of mile post 340 to town, so it seems that if just for the wildlife, wildlife habitat, and safety alone, the C3 option should truly be the selected course of action. Having spent the majority of my adult life living in Moscow and working the fields and spending countless hours on Paradise ridge and the surrounding area, I am absolutely convinced that if the highway is realigned following the E2 route, we will be consciously bringing undue harm and hardship to the associated wildlife and their associated habitat and we will absolutely see an increase in serious accidents than what we already have with the current alignment. Anyone that has spent any time on the ridge in the winter months will absolutely understand the major change in weather in just hundreds of feet change in elevation. The prudent and right course of action is to select the C3 option. I strongly encourage you to re-think the relationship between the C3 and E2 option as it will be very sad for us to consciously put this new highway in at any location higher up the ridge than the C3 option. Lloyd Mues 2201 Westview Drive, Moscow, Idaho (208)882-3828	
E-23	Lois	Johnston	Dear staff of the ITD, I heartily ask that the C3 alternative for the widening of US 95 near Moscow be used. I understand that this alternative would be better for Idaho streams and flood control. It would avoid going over Paradise Ridge, which has a lot of snow in the winter	The C-3 Alternative would impact 1.8 acres of 100 year floodplain and the E-2 Alternative would not affect any 100 year floodplain. Both the C-3 and E-2 alternatives have the same number of tributary crossings but because C-3 follows the existing roadway and is along the streams, it affects a greater length of stream

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			most years. It would also protect the last parts of Idaho native prairie. I feel it is very significant that the EPA, US Fish and Wildlife Service, and the Idaho Department of Fish and Game have all found that the route over Paradise Ridge was not advisable. Thank you, sincerely, Lois Johnston 917 E 8th St., Moscow, Idaho 83843	channels. The E-2 Alternative would not go over Paradise Ridge but would be along its base and is not expected to have substantially more snow. See General Response Weather-3 and Weather-6 regarding elevation, snow and weather related road conditions. None of the action alternatives would directly impact any native prairie. See General Response Weeds regarding effects to vegetation. See General Response Agency regarding the difference in opinion regarding ITD's and FHWA's Preferred Alternative.
E24-	Martha	McInver	Hello Adam and ITD people and consultants, Thank you for all the hard work that has gone into the DEIS for U.S. 95 near Moscow. The displays at the hearing of the various factors considered for the re-routing highway 95 were very informative. The maps and charts and providing staff to answer questions were all good. I think that the weather data was not as comprehensive as it could have been, and was not as thorough as data in the other categories. Why stint on something as important as weather in Idaho? (Of course, with climate change, who knows....) I guess the data that was looked at does not point to any strong recommendations. Listening to people's comments was not very helpful in helping me make a decision. I understood their emotions but often could not figure out what they thought was the best route or why. But it was a good process I suppose. I think it is time to act. I am leaning towards the western route at the	See General Response Weather-1 regarding the referenced sampling period and data set. See General Response Weather-2, Weather-3, and Weather-4 regarding elevation and weather related road conditions. See General Response Weeds regarding Palouse prairie. See General Response Displacement-1 for a clarification on residential and business impacts. See General Response Safety-4 regarding smaller improvements to the existing US-95.

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			moment. It seems fairly safe. It doesn't impact the native grass area near the eastern route, or disrupt or destroy the residential and business property along the current route. It takes away farmland but there seems to be a lot of that. Meanwhile, the speed limit can be lowered. Yesterday morning there was a thin layer of snow on the road and I drove at 50 to 55 mph. No one passed me, tailgated or honked. Some flashing lights or signage about the steep grades, curves, and driveways ahead would be a good thing. I have thought of driving through there 5 miles below the speed limit with my emergency flashers on. After all, the road is an emergency. Thanks again and looking forward to the project moving ahead. Martha McIver mjmciver@moscow.com<mailto:mjmciver@moscow.com> 208-882-7302 1130 Butte Rd., Moscow, ID 83843	
E-25	Mary Jane	Bailey	Adam Rush, ITD Public Involvement Coordinator Please proceed with E2 route for highway 95 Improvements south of Moscow. Then you can continue improvements north to the already completed divided highway south of Coeur d'Alene. Mary Jane Bailey Moscow, ID 83843	While the section of US-95 south of Coeur d'Alene is outside of the logical termini for the project, the proposed project will provide a comprehensive solution to deficiencies on US-95, which is used locally and regionally. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
E-26	Merry Kim	Mues	To Idaho Transportation Department, It is my hope that comments given at the public	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking

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			hearing and in comments will be heard, considered, and carefully weighted when determining realignment of Highway 95. It would seem that public safety would be of upmost importance when selecting an alternate route. I have grave concerns for public safety in regards to E-2. A road placed at this elevation will experience inclement weather from September until May. Snow, icy roads, winds, and blowing snow will occur at this elevation at a much greater rate than other alternate routes. The impact of E-2 will adversely affect the unique ecosystem of the Paradise Ridge area. The wildlife of the area (moose, deer, and elk) will be placed at risk as well as creating a road hazard. The delicate flora of Paradise Ridge would be negatively impacted by E 2. I strongly recommend route E-2 not be considered for Highway 95 realignment. Thank you for your time and attention, Merry Kim Mues	into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Schedule for information regarding the next steps in the environmental process and the anticipated schedule. See General Response Weather-3, Weather-4 and Weather-6 regarding elevation, ice, wind and snow. The E-2 Alternative would not directly affect Paradise Ridge but would be closer to it than the other alternatives. See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants. See General Response Safety-2 regarding wildlife collisions.
E-27	Michael	Jennings	Ken, Thanks for the pdf file of the proposed alignments. Could you please send me ITD's geographic information system (GIS) file of the proposed alignments? This probably exists in a format known as a shapefile (.shp), though I would accept any type of spatially referenced data file of the proposed alignments. Sincerely, Michael Jennings	The GIS files were sent to you in 2013 at your request.
E-28	Myron	Emmerson	January 6 2013 To whom it concerns,	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred

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			After reading the DEIS, I believe the eastern route is the best for both safety and environmental concerns. This project needs to be completed as soon as possible for the good of the residence of Latah Co. and the State of Idaho. As a residence of Latah County for more than 60 years I hope my voice is heard. Sincerely, Myron Emerson Potlatch, Idaho	Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3 and Safety-6. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
E-29	Nancy	Carter	Adam Rush, I am not sure I will be able to attend the hearing, so I am emailing my comments. I agree with the preferred alternative for the reasons stated in the Impact Statement: a) MOST IMPORTANT--it is the SAFEST route. b) It has the fewest access points. c) Shortest travel time. d) Least impact on streams. e) Avoids businesses. Nancy Carter 2836 Hwy 95 South, Moscow, ID 83843 Ph. 208-882-5806	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative which is consistent with your statements with the following clarifications to your numbered comments: a) The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Responses Safety-3 and Safety-6. e) General Response Displacement-1 clarifies residential and business impacts.
E-30	Neil & Ramirose	Marzolf – Attebury	My wife & I purchased our home in 2008. The home we live in is located at 3455 Hwy 95 S. This home is where we have raised our son whom is 13 for the last 5 years. Our daughter Roseletta (4) our son Mason (2) and our newest addition Dorris (6mo.) This is the only home that they know. We are planning on staying here to raise our family. This hill we live on has had many bad accidents. In fact based on the reports it is within the top 3 worst places of	See General Response Displacement-1 for a clarification on residential and business impacts. If property is acquired landowners will be compensated according to be Uniform Relocation Act. The Uniform Relocation Act is summarized in Appendix 5. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Responses Safety-3 and Safety-6. All of the Action

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			road in Idaho. We have opened our home to many a stranger at 11pm or at 1:30 am when they have slid off the road or had a accident on this hill. (we are located directly on this hill) My son Maxwell will be driving in 3 short years. I am terrified to think of the traffic a young inexperienced driver will have to deal with while simply pulling out of our driveway. I am all for the relocation of this hiway. E2 is the most logical, safest route with the least amount of impact upon the people whom live here. We may not have as much money as the people on Paradise Ridge do but really, are any of them losing their homes if the route takes the alternatives? They are not. We will be losing our property if the route takes either of the other 2 routes. This house "our home" which we have turned into a home suitable for a family our size is our home. It is where we live, it is where we are raising our family. It is a 1921 built home that I have personally rebuilt and remodeled. This home we have come to love. Simply put, anyone whom is not risking losing their home, losing their memories, I feel should not have much say so in this route process. This is our home. We would love to see route E2 happen. BTW I have been all over on my horse in this area, there are the same critters in our valley as anywhere on Paradise Ridge, that's a fact. Here not so long ago we had a moose in our yard...They don't often get that up on that ridge. E2, E2 , E2 We hope... Neil Marzolf & Ramirose Attebury	Alternatives would upgrade the roadway to AASHTO standards, improving safety. The EIS process requires that all substantive comments be considered, including comments from impacted landowners and area residents regardless of income. Close coordination with affected landowners will occur during the design process should and action alternative be selected. Based on the information from the wildlife experts, deer and other ungulates do pass through the valleys as well as Paradise Ridge. This information is stated within the DEIS but has been further clarified in the FEIS Section 3.8 and 4.8.

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E-31	David	Sarff	This comment is from David Sarff. 1167 Zeitler Rd. Moscow, ID January-22-2013 I wish ITD had done a better job on the safety oriented information of the DEIS. The small amount of weather data and the entire lack of crash and fatality estimates for traffic that will, at a reduced level, still operate on the remnant portions of present 95 is a problem. These road remnants would be operating concurrently and dynamically in time if E2 or W4 are used, with increased miles and times for those intending to commute south on new 95. This poor data is not insignificant as just one or two number changes to the crash and fatality graph renders ITD's present view supporting E2 as safer invalid. Our property, being in the drainage some distance down-hill from E-2, is sure to experience some kind of water related impact as there will be changes to the runoff for certain and limited yet still potential risk for potable water, a risk that does not exist presently. There is value in the wildlife and more natural environments that are now along and on the Ridge. E2 will strongly impact these. The environmental data does not defend E2. With the presented data I support C3 over E2. –	See General Response Safety-3 regarding how safety of the existing US-95 was considered in the revised Safety Analysis (ITD 2013). See General Response Safety-6 regarding the significance of the differences in safety between alternatives. See General Response Weather-2 regarding the referenced weather data and how it relates to the larger 30+-year data set. Additional detail is available in the Revised Weather Report (Qualls 2014). See General Response Safety-3 regarding how safety of the existing US-95 was considered in the revised Safety Analysis (ITD 2013). See General Response Safety-6 regarding the significance of the differences in safety between alternatives. See General Response Water for a description of the alternatives' impacts to water quality impacts to potable water. Additional information has been added to the FEIS Section 4.6, and 4.7. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. General Response Wildlife discusses the alternatives' effects to wildlife and natural environments on Paradise Ridge.
E-32	No Name	–	I live outside of Moscow and would like to see where you are proposing moving the highway. Where can I find this information?	Ken Helm sent the web site address, the date and location of the hearing on 12/31/12. Future updates and project information will also be available on the project website at: http://us95thorncreek.com.

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E-33	No Name	–	I read through your draft environmental impact statement. I concur heartily with your recommendations. It is long past time to put driver safety over the complaints of the NIMBY's group. We can't reclaim the lives of those lost because of this dangerous stretch of road, but we shouldn't allow any more because of the paltry concerns of a few people. Let's get this road built! Thanks for all your hard work on this issue.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
E-34	Nora	Locken	I'm curious if there are any developments concerning this stretch of Highway 95, Thorncreek to Moscow? Has the EIS pointed to any one of the three options as being the 'best" option (expanding current roadway, east route, west route)? Please let me know at your earliest convenience. Nora Locken Moscow, ID	The E-2 Alternative is ITD's and FHWA's Preferred Alternative at this time as stated in a response sent to you by Ken Helm on 12/31/12. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. No decisions will be made until after the FEIS is published and after all public and agency comments have been considered. Future updates and project information will also be available on the project website at: http://us95thorncreek.com
E-35	Rita	Bindl	Hello Adam, Please put my comments into your files, as I am unable to attend the meetings in Moscow, due to health issues. First of all, I would like to thank the ITD for all of their hard work, effort and time, not to mention costs for the in depth studies of the DEIS they have completed in past several years. I totally agree with the E2 route that ITD, FHWA and DEIS show would be the best and favored route to proceed with construction. The reasons I agree with the E2 are listed in your DEIS guide we received in the mail. It is the safest route, along with your study	See Response E-16.

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			of least effect on environmental conditions and fewest access points of ingress and egress. Also, one of the biggest issues which impact "everyone" that will use this highway is fact that it is the shortest route making it the least expensive to build and in this distressing economy be the least costly for commuters to use, in lower fuel consumption and wear on vehicles, tires, etc... The people that oppose the E2 route do not have many facts correct. The route would not go "over" Paradise ridge, it would be at the base, thus the weather is not any more adverse than any other route. The so called endangered species could be affected on any of the routes as the birds and bats fly over a large area. As far as the Palouse giant earthworm, there isn't any definite proof they actually exist. People who oppose the E2 route do not live in the impacted area and many do not live in this area at all, so they do not have to drive this dangerous 6 miles on a daily basis like many of us do. As two people that drive this stretch of roadway and have come upon several accidents and a fatal one, have lasting effects on us. Your safest route (E2) is a must for the good of anyone on the highway, not to mention our family and friends who drive this highway on a daily basis. Also, the land the E2 opposition is referring to is "private" owned land so if the landowners want to plow it under or sell it to ITD, those folks should not be able to dictate what they can or can't do with it. I am attaching a quote as one of the landowners	

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E-36	Susan	Somers	When my husband I moved to Lewiston in 2001 we were thrilled to learn that there would soon be a four lane highway up to Moscow. At that time my boys were in grade school and had planned on attending the U of I. Well, they have all graduated from college and the highway is not yet finished! That dangerous stretch of road has caused us many	The EIS process requires that all substantive comments be considered in the decision making process. See General Response NEPA and Schedule for a description of the environmental process and the anticipated schedule.

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			nights of worry. Please spare other families the constant concern over that dangerous highway and select the Departments preferred route ASAP. It's unfortunate that the self interest of a few is allowed to result in the carnage that has occurred on that road in the past 10 years. Please stop the slaughter. Susan Somers 3639 Country Club Court Lewiston, Idaho.	
E-37	Thomas R.	Brandt	Dear ITD Officials, I am writing to voice my opinion that the C-3 alternative for the U.S. 95, Thorncreek Rd. to Moscow Project is preferential to the E-2 alternative. I say this for three reasons: 1. More cost effective because it utilizes more of the existing alignment. 2. Lower impact on a. New right-of-way acres b. Prime farmland acres c. Wetlands acres 3. More fair treatment of displaced residences While the lengths of the two alternatives are technically about the same, the C-3 alternative clearly requires fewer miles of new road bed. Approximately 60% of this route follows the existing alignment whereas only 40% follows a new alignment. The E-2 alternative, on the other hand, has only about 20% following the existing alignment and 80% requiring all new roadbeds. Based on the DEIS FHWA-ID-EIS-12-01-D, the C-3 route will disrupt fewer acres of prime farmland, wetlands and new right-of-way acres as compared to the E-2 alternative. This seems to be preferable.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Your statements regarding the alternatives' impacts are accurate with the following clarifications: See General Response Displacement-1 and Displacement-2 for clarification of the residential and business impacts. All displaced residences and businesses will be treated equally and fairly per the requirements of the Uniform Relocation Act. Additional information regarding indirect effects to businesses due to relocating the highway is described in the DEIS and FEIS Section 6.1. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives.

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			There is no question that residences and businesses will be displaced and/or disrupted. However, prior reasonable expectations are not the same. People and businesses that locate along a federal highway must assume the clear possibility of changes due to the highway. There must be a reasonable expectation that the possibility for disruption will occur. Conversely, those who locate in a rural area, far from the federal highway have no reasonable expectation that they will be disrupted by the highway. Residents move to such an area specifically because it offers privacy from things like highways. To suddenly find the likelihood that a highway will be going through your property, near to your house, is not a reasonable expectation that these people should have. This is grossly unfair to people who chose to live where they did specifically so that they would be away from things like the highway. As for businesses that will be displaced, it seems that the businesses are located along the current highway by choice. This provides a transportation route for their product, customers, etc. While not being displaced by moving the highway to a new route, I would think that having the highway move away from the business will be a detriment to those businesses. Sincerely, Thomas R. Brandt 1050 Tolo Trail, Moscow, Idaho 83843	
E-38	Wayne	Olson	US 95 Project – Thorncreek to Moscow As I read here in the January 5th Edition of the Daily News; I see where Al Poplawsky and the Paradise	The EIS process requires evaluation of a range of reasonable alternatives and provides opportunity for public and agency comment, which includes landowners

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			Ridge Defense Coalition are going to take another run at using environmental concerns for shutting down or stalling the Highway 95 realignment. As pointed out in the article, there have been 220 accidents in this stretch of road during this nine years of stalling resulting in 138 injuries and six deaths. My family and I live in this corridor. First, I would ask the question of anyone of the Paradise Ridge Defense Coalition if they have asked any of the injured, if they thought the wait was worth it. Better yet, ask the families of those who died in this senseless act if the wait was worth it. Have you? In my eyes, and I believe the eyes of others this places you in the same senseless categories of the killings in the theaters and the schools. All of this injury and killing could have been avoided from the beginning. Second, I ask this question. Is dragging this out any further is worth the human misery on into the future, considering the past and the present. When this realignment started, I was concerned about the Highway 95 risk to my family who was in grade school. This has now gone on for so long, the risk now extends to my Grandchildren who live in the Corridor from Thorncreek to Moscow. I lay this all at the feet of each person of the Paradise Ridge Defense Coalition for their part of the responsibility. It is time to stop the senseless killings. Wayne Olson Moscow, ID	as well as area residents. The next steps in the environmental process and the anticipated timeframe for implementation are described in General Response Schedule.
E-39	Wayne	Olson	Ken- You may see one more opinion section from me in	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking

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			the papers, and it's documentation of what I heard as I sat through the evening hearing for Thorncreek to Moscow: Testimony at ITD hearing I know I said my piece earlier this month, but the testimony at the ITD hearing was interesting to sit through and listen to last evening (Jan. 23). One thread through all the people who testified who live in the Thorncreek to Moscow Corridor as it is today was: E-2 is preferred, C-3 is acceptable ¬ but please, please get it done. Finish the project. It was pointed out more than once, that, yes, the highway will have an impact; but all of those homes (55 one person had counted) that are built literally on and in Paradise Ridge have had, and today do have, their impact/footprint upon the Ridge. It was pointed out that a little hypocrisy lies within the environmentalist viewpoint on environmental impact statements. And they don't even live in the corridor. Back to the beginning. The thread through all the people who testified who live in the Thorncreek to Moscow Corridor as it is today, who live on the highway of the Corridor and know the daily dangers thereof, was: E-2 is preferred, C-3 is acceptable ¬ but please, please get it done. Finish the project for the safety of our community and our families, as soon as possible. Wayne Olson 1161 Jacksha Road, Moscow, ID Phone 208.596.6133	into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Schedule regarding the environmental process and the anticipated schedule. Information has been added to the FEIS Chapter 6, Indirect and Cumulative Effects, regarding the effects to Palouse remnants and Paradise Ridge from the project in combination with private development. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives.

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E-40	Wendy	–	We live along the projected routes and would like to know when we can have access to the routes these may or may not take. Also is there any form of compensation for homeowners along the route that will be having their property values decreased by this intrusion? Thank you for your response	Expressway Access Control would be applied to the highway as described in General Response Access. See General Response Displacement-1 for clarification of the residential and business impacts. See FEIS Appendix 5, for a Summary of the Uniform Relocation and Real Property Acquisition Policies Act of 1970, which will govern any displacement or compensation.
E-41	Zachary	Johnson	RE: US 95 Thorncreek Rd to Moscow realignment The eastern realignment option, taking a new road over Paradise Ridge is unacceptable. Not only will this realignment pose hazards for drivers (taking them over higher elevations where there is more snow and ice than even the current route), this alignment would take the highway over one of the last large Palouse Prairie remnants in existence. The Palouse Prairie is one of the most endangered landforms in the world, with only around 1% of the prairie remaining since pre-European settlement. This is a valuable piece of land for all sorts of animals and plants. To take the highway over this irreplaceable section of land would be a huge mistake. Please reconsider the other routes that would only disturb already developed farmland and that would leave Paradise Ridge the beautiful ecosystem it is today.	The E-2 Alternative will not go over Paradise Ridge but would be located along its base. The temperature at the elevation of the E-2 Alternative would typically be warmer than the lower elevation sites due to cold air drainage as described in General Response Weather-3. See General Response Weather-4 regarding snow accumulation for the action alternatives. The land that would be affected is primarily farmland and CRP land. The E-2 Alternative would not go over Paradise Ridge remnant and no Palouse prairie remnants would be directly affected. See General Response Weeds and Wildlife- regarding Palouse remnants and the Paradise Ridge ecosystem.
E-42	Shelley L. Palouse Commercial Real Estate	Bennett	January 30, 2013 Mr. Adam Rush ITD Public Involvement Coordinator P.O. Box 7129 Boise, ID 837-7-1129 Dear Mr. Rush, As a member of the Moscow community who has	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in

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			continually worked for healthy growth of the town, I am writing in favor of the proposed E-2 route between Lewiston and Moscow. The current route as well as the C routes have too many curves, too little visibility, and too little room to avoid wildlife, dangerous drivers, etc. As you know, this has resulted in huge number of crashes and six deaths. Straightening out that road and widening it to four lanes would considerable improve safety. The objections which have stalled the project for nearly a decade are frivolous. Arguments about safety and wildlife are little more than a cover for the real reason for the opposition - they don't want the highway to spoil their view of Paradise Ridge. In addition to the safety benefits that would come from the E-2 route, the widening of the road would make it more suitable for commerce, which, after all, is what the highway system primary purpose. The sooner this project is started, the better. In the interest of commuter safety and commerce, let's get this show on the road. Sincerely, Shelley L. Bennett	the environmental process and the anticipated schedule.
E-43	Robert	Heckendorn	I want to add my voice to encourage the use of a live snow fence on the windward side of the road if the route over Paradise Ridge is chosen. Blowing snow is already a safety issue with the segment of 95 across Genesee Flats which makes the road very slippery in windy/snowy conditions. It will be much worst with the exposure of the proposed route over the shoulder of Paradise Ridge. A snow fence will be a necessary safety feature and a live snow fence would provide wildlife habitat while making the	The E-2 Alternative would not go over Paradise Ridge but would be located along its base. ITD may evaluate the effectiveness of live snow fences as part of maintenance activities but it would not be included as part of this project. They would need to be designed to not attract wildlife towards the roadway and may need to be located outside of the ITD right-of-way. ITD will also work with landowners during the design process to minimize visual impacts where practicable. See General Response Weather-3, Weather-4 and

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			fence not an eyesore. thanks for your consideration, "The belief that there is only one truth, and that oneself is in possession of it, is the root of all evil in the world." -- Max Born Dr. Robert Heckendorn heckendo@uidaho.edu<mailto:heckendo@uidaho.edu>	Weather-6 regarding ice, snow accumulation, blowing snow, and wind.
E-44	Cathy B.	Porter	I frequently hike on Paradise Ridge, and it would be terrible to destroy the tranquility, beauty, and ecology of that area just so chip trucks could get to Lewiston a few seconds sooner. Route E-2 is unnecessary, because C-3 and W-4 would both satisfy the design standards ITD is using. But it would be even better to shrink the design to a 5-lane highway like the one between Moscow and Pullman, using the C-3 route. That would save a lot of money and cause fewer hard feelings because less land would be taken. Cathy B. Porter 725 East "E" Street Moscow ID 83843	The E-2 Alternative would not go over Paradise Ridge but would be along its base in mostly agricultural and CRP land. See General Response Weeds and Wildlife regarding Paradise Ridge. Additional information has been added to Chapter 6, Indirect and Cumulative Effects regarding indirect effects to Paradise Ridge. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. The five-lane highway would have a higher predicted crash rate compared to a four lane divided highway due to the increased numbers of accesses and turning movements. This decreased safety could be less costly to build and require less right-of-way but would not meet the purpose and need for the project. See the DEIS and FEIS Section 4.10, Transportation Effects.
E-45	Jack R.	Porter	I strongly oppose Route E-2, and I am willing to donate money to challenge it legally if persuasion fails. I think ITD's "safety" rationale for E-2 is bogus for several reasons. For one thing, it would be absurd to base a routing decision for this multimillion-dollar project on just 5 months' weather data from an atypical year. Also, I	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Weather-2 regarding the referenced data set in the weather analysis.

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			find it hard to believe ITD is really concerned about safety when so little has been done to improve safety on the existing route, such as warning signs, reduced speed limits, more active speed limit enforcement, rumble strips, left turn lanes, and better banking of turns. Jack R. Porter 725 East "E" Street, Moscow ID 83843	ITD is seeking a comprehensive and long-term solution to the identified deficiencies. Making smaller isolated improvements would not result in the most effective and efficient solution. See General Response Safety-4 regarding smaller improvements along existing US-95.
E-46	Bill City of Moscow Community Development	Belknap	See Comment Letters and Response for the City of Moscow Community Development in Section 10.3 Agency Comment Responses.	–
E-47	City of Moscow Public Works	–	See Comment Letters and Response for the City of Moscow Community Development in Section 10.3 Agency Comment Responses.	–
E-48	Abbie A. Potlatch Corporation	Acuff	Good Afternoon, I live in Lewiston and travel daily to Moscow to work at the Potlatch office, located at the address below. I have to travel this route in all types of weather and road conditions. The most dangerous section is from Reisenauer Hill north to Moscow. Without fail, each time the road is snow covered, travel on this section either slows to about 15 mph or stops completely, and there is always a vehicle is off the road on Reisenauer Hill. It is very dangerous and needs to be replaced with a four lane road. After reading through the material available on line and looking at the route maps, I believe route E2 is the best route for the new road. This route has the least amount of impact on the community (homes and businesses). I understand that some groups are	All action alternatives would improve safety at Reisenauer Hill by upgrading the roadway to AASHTO standards. See General Response Safety-5 regarding Reisenauer Hill. See General Responses Weather-3 and Weather-4 regarding elevation and snow. General Response Displacement-1 offers clarification of residential and business impacts. The E-2 Alternative would not go through Paradise Ridge but would be located along its base and closer than other alternatives. See General Response Weeds and Wildlife. Mitigation for impacts is discussed in Chapter 9, Environmental Commitments.

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			upset about it going through Paradise Ridge, however, I believe the damage to the area will be minimal and fixed once the road is completed. I am a Silviculturist for Potlatch and prior to that managed a conifer seedling nursery for 19 years. I know that any plants destroyed by the road, may be grown at local nurseries (as some homeowners on Paradise Ridge currently are doing) and planted for re-establishment after completion of the road. I don't believe that plants should take precedent over human life and safety. I do not like route C3 at all. There is too much disruption to established homes and businesses. If you have any questions or need further information, you may contact me. Thank you for the opportunity to comment. Abbie Abbie A. Acuff Silviculturist Potlatch Corporation 530 South Asbury, Suite 4, Moscow, ID 83843 208-883-1677 Office 208-791-4618 Cell 509-343-2886 Fax Abbie.Acuff@potlatchcorp.com<mailto:Abbie.Acuff@potlatchcorp.com> –	
E-49	Bill	Caldwell	I am opposed to option E-2. Surely we car route US 95 somewhere other....and preserve Paradise Ridge. Thank you... Bill Caldwell MD 1091 Saddle Ridge Road	The E-2 Alternative would not directly impact Paradise Ridge but would be located along its base. See General Response Weeds and Wildlife.

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			Moscow Idaho	
E-50	Brad	Jaeckel	I recommend the C-3 route for realignment over the E-2. Please consider this in your review. Thank you. Brad Jaeckel 2351 Orchard Ave. Moscow, Id 83843 Jaeckel_bus@hotmail.com<mailto:jaeckel_bus@hotmail.com>	Thank you for your comment.
E-51	Glenda	Bull	The E-2 route is the only safe convenient alternative and something needs to be done now. The existing ruts on the south side of Reisenauer Hill are VERY dangerous and they need to be fixed. Glenda Bull 208-285-1010	See General Response Schedule for the environmental process and anticipated schedule. Once the EIS process is complete and the Record of Decision has been issued, the ITD will negotiate the ownership of the remaining US-95 Loop which will also involve negotiating repairs. See General Response Maintentance-1 regarding maintenance on the existing US-95. See General Response Safety-5 regarding improvements near Reisenauer Hill.
E-52	Helen S.	Stroebel	I am writing to express my concerns regarding the preferred route specified by the DEIS for the US 95 Thorncreek to Moscow project. I am a resident of Boise, but have a family home and 80 acres in Latah County and am a frequent traveler of Highway 95. While I am very much in support of improving Highway 95 to 4 lanes, I am opposed to the E-2 alignment alternative and favor the C-3 option for the following reasons: * Impact on Palouse Prairie remnants - the ecosystem of Paradise Ridge, including one of the largest remnants of Palouse Prairie native habitat,	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The statements regarding effects are consistent with the DEIS and FEIS with the following clarifications: The E-2 Alternative would not go over Paradise Ridge or Palouse remnants but would come closer to Paradise Ridge and could cause indirect effects due to weeds, noise and visual effects as discussed in the DEIS. More information is provided in General Response Weeds and

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			would be seriously threatened by the invasion of aggressive, non-native weeds. The DEIS acknowledges that weed infestations will extend 0.6 miles on either side of each alternative (pg. 206). I have purchased native plant seed from a source originating from the Paradise Ridge remnant. Once these rare remnants are destroyed, they are gone forever. What that means is that our grandchildren and their children may never have the opportunity of experiencing a view into Palouse history. A visit to Paradise Ridge prairie remnant on a balmy June evening to see the vivid display of wildflowers, enjoy the silence and serenity of the view from the ridge, listen to the buzz of pollinating insects, and envision what the prairie looked like hundreds of years ago is a memorable experience. Landowners, like my family, who choose to landscape with water-wise native plants will have fewer resources for seed. Traffic noise from the E-2 route would destroy the tranquility of Paradise Ridge. * Conversion of prime Palouse farmland to highway and ecological footprint impact- E-2 route would impact nearly 51 acres of prime farmland, the economic engine of Latah County, compared with 25 acres for the C-3 route and twice the CRP land as the alternatives. Not only does this affect the productivity of the Palouse in loss of farm production to transportation use, the pastoral view of the Palouse would be visually impacted. The C-3 alignment of Highway 95 would have less impact than E-2 on the views that make the Palouse beautiful. From Moscow Mountain and from many	Wildlife regarding Paradise Ridge and Palouse remnants. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Responses Weather-3 and Weather-5regarding elevation, fog and visibility on Paradise Ridge. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. General Response Safety-3 explains how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). The removal of Goodman Oil would require clean-up of the contaminated plume; which would result in an environmental benefit, which has been clarified in the FEIS Section 4.14. General Response Maintenance-1 addresses the cost of maintaining the existing US-95 segment. See the FEIS Section 4.2 for clarification of the alternatives' consistency with land-use plans and projects.

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			sites within Moscow, Paradise Ridge and surrounding rolling hills create a spectacular view and are the subject of many landscape photographers. I have attached a photo of that view of Paradise Ridge and would hate to see it destroyed by a steady stream of traffic headlights. * C-3 is more consistent with existing land use and plans (pg. 143: "C-3 is viewed by the City of Moscow as the most consistent with land use goals) * Wildlife habitat - C-3 alternative would have least effects to wetlands (pg. 156) affecting wildlife habitat while E-2 would have the greatest impact on resident wildlife (pg. 171: "E-2 could affect movement of moose and elk that currently travel between the pond and Paradise Ridge"; pg. 166: "the tributaries affected possess greater habitat value..."). * Public Health and Safety * Weather - From our family property on Moscow Mountain, we have the opportunity of viewing Paradise Ridge and have observed the frequency of a cloud sitting on the Ridge. I believe that the DEIS underestimates the impact of reduced visibility for the E-2 alternative. * Travel time differences are insignificant in the great scheme of things: E-2 of 5:30 vs. 6:02 for C-3. I don't think that a difference of 32 seconds is going to impact freight transport or the "economic vitality of the area" (pg. 176). * The DEIS underestimates the full impact of crashes in that it fails to include crashes that would continue to occur on the existing section of highway	

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			95. Building the E-2 highway will reduce the rate of crashes on Highway 95 but doesn't eliminate crashes that will occur on the existing highway section because of its greater number of access points. In addition, much of the difference in predicted crash rates is an artifact of the difference in crash rates between the C-3 and E-2 routes and the relative lengths of divided 4-lane vs. 5-lane suburban sections. The benefit of C-3 is greater pedestrian and bicycle safety (pg. 177: C-3 would have the greatest length of 4-lane with center turn lane, curb, gutter and sidewalks). * The remediation of Goodman Oil contamination required in the C-3 alternative would be good for the environment. * Cost shift - with the E-2 route, the cost of maintaining the abandoned section of the existing highway 95 would be shifted to the county highway district, increasing the burden on the local tax base. Thank you for the opportunity to comment Helen S. Stroebel Residence: 10258 West Waterway Court, Boise, ID 83714 Landowner: 3324 West Twin Road, Moscow, ID 83843	

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E-53	Joan	Klingler	Good morning. I know you have been inundated with letters from residents who live on Paradise Ridge taking a stand against the E-2 option for completion of Hwy 95. They are a very strong group and have been quite vocal during this whole process. I'd like to make a point from our perspective. 1) My husband and I must drive to Lewiston a number of times each month. During the winter the scariest part of the trip is coming down Reisenauer Hill and then winding up the hills north of Snow Rd. 2) Any option but E-2 still keeps Reisenauer Hill in the plan, with the roads only diverging at the bottom of the hill. The "hill" is a dangerous part of the highway, especially during the wintertime. Also dangerous when we, who obey the speed limit, have cars on our tail because we tend to slow down coming over the top of the hill due to the curve at the bottom. We have been passed numerous times near the curve because of impatient drivers, adding more danger to the trips. 3) These residents of Paradise Ridge, who discuss	The NEPA process requires that all substantive public comment be considered. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-5 regarding Reisenauer Hill. As noted, Paradise Ridge is subject to past, present and increasing residential development. Additional consideration of the effects to Paradise Ridge, including residential and commercial development, has been added to Chapter 6, Indirect and Cumulative Effects. See General Response Weeds and Wildlife regarding flora and fauna. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remains valid. See General Responses Safety-3 and Safety-6. See Chapter 9, Environmental Commitments for mitigation measures.

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			disturbing the flora and fauna in that area, didn't hesitate to build their homes (which disturbed the same ecosystem) in that area many years ago. So why is it different that some areas would be disturbed when a safe highway is built? 4) The other two alternatives do not address the safety issue of Reisenauer Hill, and the western alternative makes the least sense. We strongly support the E-2 alternative. It is the safest, the straightest, and just makes sense. Sincerely, Joan and George Klingler Moscow Joan Klinger	
E-54	John	Crock	After speaking with an IDT representative at the recent highway 95 re-alignment forum, he admitted that the safety numbers for the E-2 alternative are underestimates of the big picture. The big picture is that in the E-2 option, old 95 still exists. People, including residents on that stretch, will still drive old 95. Accidents will occur and people will die on that old stretch. Of course the traffic will be greatly less, so maybe accidents will only occur at 1/10 of the current rate, but when you add in those numbers to the projected accident rate on E-2, E-2 is the most dangerous alternative. C-2 obliterates the old 95 roadway, so there are no additional accidents and is thus safer in the big picture. In addition IDT models E-2 as being safer than C-2 because there are no businesses on it since it hasn't been built. As soon as there is high traffic flow on E-2, savvy business or property owners will develop the adjacent land and it will soon be as congested as old 95 is today,	The E-2 Alternative would have the greatest safety benefit even when considering the safety of existing US-95. See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. The action alternatives would have Expressway Access Control, which would restrict new accesses and reduce the potential for sprawl. See General Response Access. General Response Maintenance describes how the existing US-95 will be maintained. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			meaning the lower accident projections will be short-lived. When I first started driving 95 nearly 40 years ago, the speed limit was 55 MPH. Now, despite it being well known as one of the most dangerous roads in Idaho, the speed limit is 60MPH. I don't trust IDT to improve safety on old 95 once E-2 is built because they have done nothing and in fact made old 95 more dangerous in the intervening decades. Let's go with the safest alternative, the central route and get rid of those death curves. Using the existing corridor worked well with the 15 miles from Thorn Creek to the top of the Lewiston grade, let's continue that success and get the C-2 route built. John Crock 3100 West Twin Road, Moscow, ID 83843 208 883 1150	
E-55	Dan	Rathmann	I urge the adoption of alternative C-3. I concur with the following itemization of socio-economic impacts, not the least of which is that problems with the existing roadway would not be pushed off onto Latah County taxpayers by adopting C-3: * Land Use: C-3 would take the least prime farmland of statewide importance and Conservation Reserve Program land, whereas E-2 would use twice as much. City of Moscow staff consider C-3 the most consistent with city/area of impact land use goals and more compatible with a proposed Moscow ring road. * Access: C-3 requires the least amount of new right-of-way and would have the most access points	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The stated information is consistent with the DEIS and FEIS with the following clarifications: See General Response Maintenance-1 regarding maintenance of the existing US-95 section. Land Use: ITD will work with the City of Moscow to incorporate the Ring Road concept into the alternative chosen once Ring Road has preliminary design and funding. FEIS Sections 3.2 and 4.2 discuss the alternatives consistency with land use plans and the Ring Road concept.

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			providing the most convenience and best emergency response times for local residents. The addition of frontage roads currently not proposed by ITD could correct the slightly higher accident rate due to access and result in a C-3 safety rating similar to that of E-2. * Businesses/Residences: C-3 would affect eight businesses with more noise, whereas the other two alternatives could undermine their viability in the absence of Highway 95 traffic. C-3 would dislodge one residence and affect no domestic wells; E-2 would move five-plus residences and impact two wells. * Accidents & Safety: Based on a flawed DEIS safety analysis that does not consider weather conditions and C-3 corrections of the unsafe sections of the current highway, about 4.7 predicted fatal and injurious crashes could occur on C-3 per year, compared to 3.8 on E-2. E-2 would abandon these dangerous stretches as a county road, and accidents would continue to occur there. * Weather: ITD reports that 57 percent of highway section accidents happen during inclement weather. But the DEIS only analyzes snowless conditions between January 1 and May 31, 2005, during the mildest winter in 25 years. E-2 would traverse the highest weather-exposed elevations for the longest distance. * Aesthetics: C-3 would cause the least visual impact, whereas E-2 would have the greatest impact – more than twice that of C-3. E-2 would impose the most noise effects – seven, but C-3 would only	Access: Adding frontage roads to the C-3 Alternative was considered as explained in General Response Safety-1. Businesses/Residences: See General Response Displacement-1 for a clarification of residential and business impacts. Accidents and Safety: General Responses for weather provide clarification of the differences in weather conditions between alternatives. See General Response Weather-2 regarding the referenced weather data and how it relates to the larger 30+-year data set. General Response Weather-8 addresses the validity of the Weather Analyses. General Response Weather-3, Weather-4 and Weather-5 address the differences in address how elevation, frost and other weather related driving conditions between alternatives See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). Costs: See General Response Safety-6 regarding the significance of the difference in length and safety between the alternatives. In response to public comments, ITD also completed a Mobility and Road User Cost Study for the alternatives, which is summarized in the FEIS Section 4.10.

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			impart one. * Costs: Although E-2 would be the shortest route, C-3 would be only 0.09 miles longer. C-3 and E-2 would require about equal construction costs. In summary, C-3 would fulfill the DEIS purpose and need to increase Highway 95 safety, better than E-2. ITD wrongly indicates that C-3 would have slightly less safe conditions and cause higher business and residence displacements than E-2. Submitted February 15, 2013, Dan Rathmann 219 N. Lieuallen St, Moscow, ID 83843 208-882-8262	
E-56	Sarah	Ullrich-French	Adam Rush, ITD Public Involvement Coordinator I frequent the US 95 road and I would like to share my opinion on the US 95 Thorn Creek Rd to Moscow. I utilize the US 95 road several times a week. I agree that the road needs to be improved and that safety is a primary concern. I have lived on the Palouse for most of my life and I frequent the Paradise Ridge area. Based on my personal experience and knowledge and as a researcher myself, I was very concerned to read about the Draft Environmental Impact Statement findings. I have serious concerns about the quality of the data collected and the way that it is reported. I find the endorsement of the E2 option to be flawed and misleading to the public. It appears to be praying on the public regarding safety concerns which do not appear to be accurate. In light of the evidence supporting C3 and against E2, the endorsement of E2 is surprising and in fact raises public concern about process and potential special	The DEIS was prepared in accordance with ITD and FHWA NEPA regulations [23 CFR 771]. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Responses Weather-2, Weather-3, Weather-4, Weather-5, Weather-6, and Weather-7 for additional information on the weather data, elevation, ice, snow, microclimates and other weather conditions. Additional information is also available in the Revised Weather Report (Qualls 2014). See General Response Safety-3 regarding how the safety of existing US-95 was considered in the revised Safety Analysis (ITD 2013).

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			interest that is pushing the E2 route despite the evidence against using this route. Because I frequent the Paradise Ridge area, I have purchased a more robust (SUV all-wheel drive) vehicle because of the differences in weather and road conditions that exist on Paradise Ridge compared to Moscow. I don't need that vehicle in town, but I do when I go up towards the Ridge. It does not make sense to make predictions for the different routes based on weather that fluctuates depending on elevation and location. Where the current road exists provides a distinctly different road condition and weather pattern compared to Paradise Ridge. Weather is clearly different on a regular basis and produces quite treacherous conditions which appear to pose a significant safety concern. The majority of the accidents that occur on 95 are weather related. The proposed route E2 is the highest in elevation (making it the most consistent weather with Paradise Ridge) and the most different from the current location. In the winter months this location is more icy/snowy/dangerous. Therefore the safety risk of E2 appears inaccurate and flawed. The current weather data does not seem to provide a good basis for accurate predictions. I know statistics and prediction. There is a lot of potential for error that is inherent to the prediction process. The data used to make such predictions must be measured accurately. The weather data collected is not representative of the range in weather that the specific routes proposed. The location, dates and year the weather data was collected is clearly not	See General Response Weeds and Wildlife regarding indirect effects to Palouse remnants including Paradise Ridge. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. See General Response Displacement-1 for a clarification of impacts to businesses and residents.

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			representative and therefore cannot produce accurate prediction. The weather analysis is simply invalid and does not hold up to scrutiny. This is something that can be used to persuade the general population, but it is not accurate for those that understand research, and is irresponsible to use it to make safety claims that are highly questionable and potentially harmful in their effects. Additionally, the most dangerous sections of the current road would continue to operate as country roads, therefore continuing to pose safety risks. The newspapers are rife with passionate cries for safety. And, I would argue that the E2 route poses safety risk that has not been accounted for currently. If the safety argument is to be a persuading factor, then E2 should not be the endorsed route. It seems the responsible and ethical decision will consider accurate data before inflaming the public regarding safety. Endorsements for E2 based on safety should not be taken into consideration. I also believe that there are other important considerations in the road location. The C3 route would require the least right-of-way and take the least amount of prime farmland and CRP land, has the least effect on wetlands and general wildlife, and is consistent with Moscow impact land use goals. This appears to consider both personal and public interest, both of which are maximized with C3. Whereas, E2 takes twice as much prime farmland, would produce the most noise effects, greatest visual impact, affects 2 domestic wells, and will have	

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			an environmental impact on large and small wildlife, pine stands, and Palouse prairie remnant. These disadvantages to E2 are compelling. It looks very clear that C3 is a superior route compared to E2 on many levels. I highly endorse the C3 route based on the many public and private benefits that appear with this route over the others. Because this route is not more expensive than E2, is negligibly longer (only .09 mile!), and the effects of business displacement is difficult at best to predict – this appears to be the reasonable choice. Please consider these factors in the decision process to arrive at a sound and reasonable route. Based on the data provided C3 is the reasonable route to improve US 95. Thank you, Sarah Ullrich-French, PhD Washington State University PO Box 642136, Pullman, WA 99164-2136 509-335-6858 sullrich@wsu.edu<mailto:sullrich@wsu.edu>	
E-57	Bruce	Taylor	Thorncreek to Moscow. You people seem hell bent on putting that highway over the end of Paradise ridge. We the people have been telling you we don't want it there for near 10 years. What part don't you understand? Since when does all the voices of the little people not count as much as a few of the rich and powerful? Just use the existing road and widen and improve it. Leave the mountain alone!!! Bruce Taylor	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. Public involvement is an important part of the environmental process and includes all facets of the public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. The other action alternatives would be located further

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				from Paradise Ridge than the E-2. Widening the existing road would not address all of the identified safety deficiencies including substandard curvature, grade, access and head-on collisions. Widening the existing roadway was evaluated early in the screening process as the C-1 Alternative. See DEIS and FEIS Section 2.5.1 for an explanation of why it was eliminated from detailed analysis. See DEIS and FEIS Section 2.4.2.
E-58	Wayle L.	McProud	To Whom It May Concern, This comment is in support of constructing Highway 95, Moscow to Thorn Creek, along E-2, skirting Paradise Ridge. This alternative is reported to be the safest, most cost effective and most direct route, a "three fer". Wayne L McProud	Thank you for your comment.
E-59	David and Molly	Hallock	Dear Mr. Adam Rush, Thank you for the opportunity to comment on the "U.S. 95, Thorncreek Road to Moscow Project." The public meeting in Moscow on Jan. 23 was very well done; we thank and commend all the contributors. Before attending that meeting, we could not understand why Option E-2 was preferred over Option C-3 when Option E-2 has by far the highest visual impact and appeared longer, steeper, and at higher elevation. We are still not convinced that E-2 is the best option but we can see how reasonable people might prefer it. Specific comments follow: * What are the costs of building and the long-term costs of maintaining the different options? Constructions costs are provided but they do not include right-of-way, mitigation, maintenance, and	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The estimated costs of building and maintaining the alternatives are presented in the FEIS Chapter 8, Construction Phasing and Funding. See General Response Maintenance-1 regarding maintenance of the roadway. Additional information regarding visual effects has been added to the FEIS Section 4.11. A ground level visualization from Moscow was available in the DEIS Community Impact Assessment Technical Report (ITD 2006) in Appendix B. General information regarding the topography and grades of the alternative was added to the FEIS Section 4.10.

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			other costs. * It would be easy to include a ground-level photo of Paradise Ridge with the planned route of E-2 marked. As far as we can tell, this wasn't done, even in the "Visual Resources" document. E-2 has by far the highest percentage of "high visual impact" and will be in clear view of Moscow residents. This is one of the biggest disadvantages of E-2, yet it isn't shown at ground level and it is somewhat unclear (to us) from aerial views exactly where the road will go. This view should have been included in all public presentations and in the DEIS. * We are concerned that the worse weather conditions along the E-2 route have been underemphasized. The draft EIS states "Therefore, weather was considered when developing the design elements but will not be a major factor for comparing the alternatives." Both E-2 and C-3 are within the eastern corridor (EC) and it appears that weather was not differentiated between the two. Still the route of E-2 up and over the west end of Paradise Ridge may be snowier and foggier than the C-3 route. E-2 would likely require more (and costlier) snow removal than the C-3 or W-4 routes. More snow, more fog, (and steeper grades?) could result in an underestimate of crashes along E-2. * According to the DEIS, "All alternatives would traverse the rolling terrain of the Palouse and have similar maximum grades and curvature". However, it appears the C-3 route follows a more steady grade into Moscow while E-2 stays high then drops over the west end of Paradise Ridge into Moscow. This	See General Response Weather-3, Weather-4, and Weather-5 regarding weather, elevation, snow, fog and other weather related driving conditions. See General Response Weather-1 regarding how data for the C-3 Alternative was presented in the DEIS and Weather Analysis. Winter maintenance is addressed in General Response Maintenance-1. General Response Weather-8 addresses the validity of the Safety and Weather Analyses. The lengths of the early alternatives were originally longer and close to MP 337. The alternatives evaluated in the DEIS begin at MP 337.67. See FEIS Section 2.5, Level Two Screening. While any of the alternatives would have a maximum grade of five percent, the alternatives differ in the amount of hills and curves as well as the orientation of those hills, which can have an effect on road conditions. See General Response Weather-4 regarding how snow accumulation and grade compare between alternatives. See General Response Safety-6 regarding the significance of the difference in length and safety between alternatives. The E-2 Alternative would be a straighter and flatter alignment with two lanes in each direction. This should reduce turning movements, and excessive braking which is expected to result in less need to use "jake brakes"; however, jake brakes would not be prohibited. The pamphlet was a public involvement tool intended to assist the public to understand the hearing process, the alternatives and to notify them of the hearing and is not part of the DEIS document. The DEIS is the decision

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			implies steeper grades at the north end of E-2. (Why were no topographic maps included in the DEIS?) We could find no information about grades except that it would not exceed (a relatively steep!) 5%. The percentage of different grades for the different routes should be included in the DEIS. * Different lengths are given in places for the different routes and the reason for this given in the DEIS is that the length of the project limits changed. We aren't sure how this would change E-2 from being shorter than C-3 to being longer (see "Screening" pages 5 and 6). Please state whether all lengths are based on the distance from the same project beginning and ending points (mp 337.67 to mp 344.00). *Crash estimates are one of the strongest arguments for C-3 but are they meaningful? How good is the crash estimate model? What are the errors in the estimates? How well does the model predict current average crashes? Is the difference in estimates between the routes statistically significant? * The noise impacts of E-2 are based on estimates within 300ft of businesses and residents. Presumably, trucks will be using air brakes as they come down off the ridge into Moscow along E-2 and, while the noise may not exceed requirements, it will affect quality of life in residential areas south of town much farther away than 300 feet. Why isn't that discussed? Why is prohibiting air brakes not included and discussed in the list of optional abatement measures (Noise, page 14)?	making tool. See FEIS 4.12 regarding noise effects including "jake brakes". See General Response Safety-7 regarding the methodology for the Safety Analyses. Improving the existing alignment to a four-lane roadway was evaluated as the C-1 Alternative early in the screening process. See DEIS and FEIS Section 2.5.1 for why it was eliminated from further consideration. General Response Safety-4 discusses small safety improvement to the existing roadway.

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			* The advantages and disadvantages in "US95_EAguide6.5x9.5web.pdf" are presented in a way that supports IDT's preferred option (for example, listing advantages of E-2 and disadvantages of the other options). Interestingly, most of the advantages of E-2 benefit the traveler while most of the disadvantages accrue to residents. * The DEIS Section 4.1.1 (and repeated in 4.11.2) claims that Paradise ridge "serves as a reason both for and against the E-2 alternative. "Citizens for a Safe Highway 95" have argued that putting the highway across Paradise ridge will enhance the visual aspects [for drivers]. Well, maybe, but putting a road through the middle of the scenery is hardly equivalent to the counter argument that the existence of the road will mar the view. The visual resources argument is clearly and strongly against the E-2 alternative and the DEIS should not imply otherwise. We believe the roadway through the project area needs to be improved and a reasonable case can be made for the three improvement alternatives but especially for C-3 and E-2. (A fifth alternative--improve and widen the existing roadway--seems to have been dismissed out of hand. Why wasn't that discussed? Perhaps we missed it.) In general, we believe that the improved roadway should follow the existing route as much as possible, balancing cost and considerations described in the DEIS, such as driver safety. We believe C-3 does that. David and Molly Hallock 119 Flint St	

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			Moscow, ID 83843 PS: We cannot tell exactly where the road is going to go from the overhead maps. Could you email to us or direct us to any topographic maps, narratives, or ground-level views that would demonstrate exactly where E-2 option is envisioned to traverse the landscape as seen from Moscow?	
E-60	Debra K.	Ellers	Dear Sir or Madam: I am writing to support Alternative C-3. As a resident of Moscow, I frequently drive this route, and can attest that changes are needed. However, I am also highly concerned about the vitality of the remnant wildlife and native plants of the Palouse, which is one of the most endangered ecosystems in Idaho. The integrity of local farms should also be preserved to the maximum extent. Therefore, I encourage you not to adopt the preferred alternative because of its impacts on wildlife, native plants and farmland, but instead use the C-3 alternative as having much less impact to these values. Very truly yours, Debra K. Ellers 116 Garfield St., Moscow ID 83843	The E-2 Alternative would not directly affect Palouse remnants but would be closer to Paradise Ridge, a high quality remnant, compared to the other alternatives. See General Response Weeds and Wildlife regarding effects to Palouse remnants, vegetation and wildlife. The E-2 Alternative would affect the greatest amount of prime farmland; however, it would have less effect to the most productive farmland in the area which is located along the Modified W-4 Alternative. Measures that would minimize farmland conversion and indirect effect to farmland include controlling non-agricultural access points along US-95 and working with farmers to construct farmable slopes. See General Response Access-1.
E-61	Don	Kaag	This has dragged on and on for years. People are injured or killed on the existing 2-lane road from ThornCreek Road to Moscow every year, and their injuries or deaths are unnecessary. It is well past time for the ITD to stop dragging their feet to accommodate the fat cats who own homes up on Paradise Ridge and just reroute and improve the road to 4-lane and be done with it.	See General Response Schedule regarding the environmental process and the anticipated schedule. ITD through the EIS process will consider all substantive comments received from agencies and the public.

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			Build the bypass! Don Kaag 1316 N. Mountain View Rd., Moscow, ID 83843	
E-62	Jeff	Handel	Mr. Helm, I commute to work along this stretch of road and am in favor of the safest proposed route. I have seen many accidents on the current road and a solution to this problem needs to come soon! The E-2 route looks to be the safest alternative and it is ITD's preferred alternative. Human safety should be the number one priority when making the decision to choose a route. I support moving forward with this project ASAP and doing so along route E-2. Thanks for the opportunity to comment. Sincerely, Jeff Handel, Moscow	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Responses Safety-3 and Safety-6.
E-63	Jim	Roach	About a month ago, I sent a comment concerning the new U.S.95 project at Thorncreek Rd. My comment I said that route W-4 was the option I favored. Now that the hearing is over I have changed my mind and now favor C-3. Please consider this option as the best one. Yes, E-2 is the favorite of the state, but you are leaving the existing section(s) of the highway as is. Wrong! This does nothing to alleviate the dangerous conditions on Paradise Ridge. Yes, use will go down, but the danger still exists for the area drivers who will continue to use old 95. It seems to me that the Draft Environmental Impact Statement is mislabeled. It should read "Draft ECONOMIC Impact Statement,"' cause that is the main consideration. It also seems to me that the environment is of no concern to you. For example,	General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95. General Response Maintenance-2 discusses the process of addressing the existing safety deficiencies on the existing US-95 section. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. No Palouse Prairie or remnants will be directly impacted. See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants. However, as stated in the DEIS, the E-2 Alternative

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			did anyone consider the dramatic impact on the water table? The existing highway already has channeled the water into the culverts and sped it rushing downstream. And you want to do it again? How many acres of forest will be "harvested" for this project? How many acres of the ORIGINAL Palouse prairie will be removed? And, what's left will have it's water directed away quickly. This will kill most of what's left after you scrape away what is needed to clear the path chosen. Do more research! You're option is a poor one. Yes, E-2 may be a slightly safer route. But, at what cost? You obviously aren't interested in doing what's right for the ENVIRONMENT. Economics is the main concern. Up right wing alley, the choice of those who have ceased to be representative. Sorry, but C-2 is a better choice. CLEARLY Jim Roach, Moscow	would impact approximately 3.9 acres of planted pine trees. See General Response Water-1 regarding effects to groundwater and wells. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. –
E-64	Karen	Jennings	Dear Adam, I am writing concerning the two routes for a much-needed 4-lane highway south of Moscow. ITD would still prefer to use E-2 when there is an alternative available. There are many reasons why I believe C-3 is a preferable route, but three main reasons stand out for me. 1. It will be much more visible route from Moscow, whereas C-3 is lower down. 2. The noise level will be much greater with trucks coming down the slope and having to brake. 3. The most troubling aspect of this is how the weather analysis was done. The E-2 route is much further up, and this means it is much more susceptible to winter weather conditions. I	Four alternatives were evaluated in detail in the DEIS, the No Action, W-4, C-3 and E-2 Alternatives. Since the DEIS the W-4 Alternative was modified and is now the Modified W-4 Alternative. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Your numbered points are consistent with information presented in the DEIS with the following clarifications: 2. The E-2 Alternative would descend in elevation more gradually than the C-3 and Modified W-4 alternatives, which would require less braking. Additional

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			remember the winter of 2005. It was not much of a winter, and past MLK weekend, there wasn't much snowfall. In fact, the ski areas had to close early for the season. I remember hiking in the mountains during Spring Break because we couldn't go skiing. Do we really want to rely on the weather analysis from such an unusual winter? This choice would be much more credible if the weather analysis came from a more typical winter. ITD is choosing a route with potentially greater hazards due to the weather. Thank you for your consideration. Karen Jennings 616 East 7th St., Moscow, ID 83843	information regarding noise from jake brakes has been added to the FEIS Section 4.12. 3. See General Response Weather-2 regarding the referenced data set and how it relates to the larger 30+-year data set. See General Response Weather-3 and Weather-4 regarding elevation, snow and weather related driving conditions. See General Response Weather-8 regarding the validity of the Weather Analyses.
E-65	Patricia	Rathmann	I am writing to express support for the C-3 Alternative. There are many problems with the E-2 proposal. I observe heavy fog on Paradise Ridge until noon many days even in the summer. Construction there will damage native habitat beyond repair. Four lanes will create a speedway and traffic will not slow down as it reaches Moscow. And finally, no attempt has been made to create a safer route on the current road. I drive back and forth between Moscow and Lewiston frequently. I find that the only way to take some of the curves safely is to slow down to 45 miles per hour. I also travel to a job in Spokane several days a week and notice that many curves there have recommended speeds as slow as 40 miles per hour. At the January 23 public hearing, I spoke with several of your representatives concerning safety. Even though I pointed out that most of the accidents occurred on curves and questioned why speed was not lowered significantly	See General Response Weather-5 regarding elevation and fog on Paradise Ridge. The E-2 Alternative would not have construction activities on Paradise Ridge but would be closer to Paradise Ridge compared to the other alternatives. Many of the primary roadway deficiencies would not be addressed by repairing the existing road. The dangerous curves and grades would not be improved, nor would accesses be eliminated. The safety deficiencies would continue to exist on the existing road and therefore the purpose and need would not be met. See Safety-4 regarding lowering the speed limits. See General Response Safety-3 regarding safety on the existing US-95 should an action alternative be constructed. The E-2 Alternative would be closer to Paradise Ridge than the other alternatives and could result in indirect effects. See General Response Weeds and Wildlife regarding indirect effects to Palouse remnants and

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			there, I was told that their mechanical gadgets set the speeds. Are we to believe mechanical gadgets or actual accident statistics? When I asked, what will happen when the old Rte. 95 becomes a county road, I was told that there would be less traffic and therefore fewer accidents and fewer deaths. This sounds to me like IDT is anxious to wipe their hands of the whole affair, turn the beautiful, serene Paradise Ridge into a four-lane drag strip and let the Latah County Commissioners hold wakes over the future highway deaths. Thank you for your consideration of my comments. I can only hope that you will do the right thing to preserve the only remaining remnant of the Palouse Prairie in our area. Patricia Rathmann 219 North Lieuallen Street, Moscow, ID 83843 208-882-8262 plr23@cornell.edu<mailto:plr23@cornell.edu>	Paradise Ridge. See General Response Access regarding how the access will be limited for the action alternatives.
E-66	Susan	Calvert	I urge that the C-3 alignment be selected, as recommended by the Idaho Department of Fish and Game, the Environmental Protection Agency and the U.S. Fish and Wildlife Service. We should have learned by now that once an area is paved over it cannot be reclaimed. We need to preserve and protect the areas of Palouse Prairie that remain. While we wait for completion of this important project I strongly urge that safety on this section of Highway 95 be enhanced through use of center line "rumble strips", a lowered speed limit and increased signage. Thank you,	See General Response Agency-1 regarding the difference in opinion regarding ITD's and FHWA's Preferred Alternative. The E-2 Alternative would not directly affect any Palouse remnants. See General Response Weeds regarding indirect effects to Palouse remnants. See General Response Safety-4 regarding making smaller improvements to the existing US-95.

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			Susan Calvert 1904 Pinto Drive, Moscow ID 83843	
E-67	Palouse Environmental Sustainable Coalition	–	Our group voted unanimously at our monthly meeting on Sunday, February 17, 2013, to support the C-3 proposal for the realignment of Route 95 between Thorn Creek Road and the city of Moscow. As an environmental group, we feel that routing would be not only the safest for both human and non-human life, but also the only route compatible with the preservation of the remaining parcel of the fast disappearing Palouse Prairie. Thank you for considering our comment. Palouse Environmental Sustainable Coalition (PESC) sustainablepalouse.org 420 East Second St, Moscow ID 83843	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remains valid. See General Response Safety-3. See General Response Safety-6 regarding the significance of the difference in safety between alternatives. See General Response Safety-2 and Wildlife regarding effects to wildlife and how wildlife collisions were considered in the Safety Analyses. See General Response Weeds for information regarding indirect effects to Palouse remnants.
E-68	Tanya	Gale	To Whom It May Concern, I am writing to you concerning to proposed Highway 95 realignment to the South of Moscow. Of the proposed realignment routes, I am in favor of route C-3. This route would require the least amount of new construction and is the most consistent with the City of Moscow land use goals. I am concerned that the E-2 route would have detrimental environmental effects, especially in bisecting some of the last .01% of the endangered Palouse Prairie ecosystem. With the rich soils in our region, so much of the Palouse Prairie has been transformed into agricultural land, leaving very little	The E-2 Alternative would be primarily located through farmed fields and CRP lands. It does not bisect any Palouse Prairie remnants but would come closer to Palouse remnants compared to the other alternatives. See General Response Weeds. Additional clarification has been added to the FEIS Section 4.2 regarding the consistency of the alternatives with the City of Moscow land use. See the FEIS Chapter 6 for additional information regarding the effects of past, present and reasonably foreseeable future projects including commercial and residential development. Should the E-2 Alternative be selected, it would have Expressway Access Control as

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			to prairie. I disagree with destroying more of this habitat with roadways when alternatives exist. The Environmental Protection Agency and the Idaho Fish and Game Department both recommend against E-2. I hope you will listen to their concerns, as well as mine, on this proposed route. Once again, I strongly support route C-3. Thank you for your time, Tanya Gale	described in General response Access. See General Response Agency-1 regarding the difference in opinion for ITD's and FHWA's Preferred Alternative.
E-69	Carol	Mayer	Hello, I live in Genesee and work in Moscow so I am traveling this part of U.S. 95 usually five days a week, if not more. After looking at the video and reading the information provided on http://us95thorncreek.com/ I favor the E2 route. Thank you, Carol Mayer 251 N Jackson St, Genesee, ID 83832 208-285-1630	Thank you for your comments.
E-70	Christopher	LaPaglia	I am writing you to comment on the draft environmental impact statement for the U.S. 95 Thorncreek Road to Moscow project. In summary, this DEIS is flawed and should not be used as a basis for approving this project as outlined. It is clear that the DEIS reflects the same corrupt process that initiated the original push to adopt the E-2 alignment as the preferred alignment. Specifically, members of the Latah County Highway District (a Mr. Clyde chief among them) have engineered this alignment to be the most beneficial for their families and personal interests, and have worked since the inception of this project to have it	FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources. The numbers of displacements for the alternatives are presented throughout the DEIS. See General Response Displacement-1 for a clarification of residential and

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			be the final choice. I pointed out that clear conflict of interest years ago when comment was first taken on this project. Almost a decade later this cronyism is still driving the decision making around this project. I am unclear as to the persons and mechanisms which have kept this faulty plan so firmly in place, but I do not accept them as valid and democratic. The DEIS as written contains factual errors and misleading statements. These are clearly intended to put the E-2 alignment in the best light while ignoring or minimizing the many problems with this alignment: The C-3 alignment is said to displace eight businesses, while that is clearly not true. The E-2 alignment is touted as shorter than the C-3 alignment. In fact it is 0.09 miles shorter, which is insignificant. The E-2 alignment would end up displacing more homes than any other alignment, but this is not mentioned in the DEIS. The weather studies show no major difference between the E-2 and C-3 alignments in regards to snow. These studies are clearly flawed, being made in an unusually low snow year. I can see with my own eyes the difference in weather between the middle of the ridge and the foot of the ridge, day after day, Winter after Winter. The E-2 route stays in the higher snow area for most of its length. Building the E-2 alignment adds more new highway miles than the C-3 alignment, while putting a major road into an area which currently has no major roads; no paved roads of any sort. This will clearly have a larger effect on wildlife and habitat, including	business impacts and potential impacts. See General Response Safety-6 regarding the significance of the difference, including the difference in lengths between alternatives. See General Response Weather-2, Weather-3 and Weather-4 for an explanation of the weather data, elevation, snow and weather related driving conditions. See General Response Weeds and Wildlife regarding impacts to Palouse remnants and Paradise Ridge. General Response Schedule describes the environmental process and the anticipated schedule.

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			the Palouse Prairie remnants up on Paradise Ridge. Please put aside the current DEIS totally and write a new document reflecting the reality on the ground. The C-3 alignment is clearly the best of the three alignments shown in many different ways. Thank You, Christopher LaPaglia 510 Hunter St. Moscow, ID 83843	
E-71	Daniel R.	Miller	Again, we the people of the Lewiston-Moscow area have suffered another unnessary death on US95, Reisenauer Hill. Please put an end to the carnage. Reroute and build US95 as it should be. Ignore the wackos who want to stop progress. Strive for public safety.	The EIS process requires consideration of comments from all facets of the public. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. See General Response Safety-5 regarding improvements near Reisenauer Hill.
E-72	Jim	Bloomfield	ITD: After a decade of time to make a decision as a taxpayer I would appreciate that we move forward this project using the safest route possible. The accidents and deaths alone should be making this decision. Please expedite, do the right thing and get the job done! Now. Thanks, Jim Bloomfield	The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3 and Safety-6. See General Response Schedule regarding the environmental process and the anticipated schedule.
E-73	John P	Snyder	Mr. Adam Rush and Others of the Idaho Department of Transportation: As IDT finalizes its approach to a U.S. 95 improvement south of Moscow, this is an appeal for respect for the integrity of the Palouse landscape--unique in all the world--and for an approach mindful of farmland. There is no better soil for growing wheat, and to excavate and pave over more than is necessary will prove to be short-sighted. With this in mind, I have a few additional comments:	(1)The proposed improvements are important for local, interstate and regional travelers, as US-95 is the only north-south highway in Idaho. In an effort to implement one comprehensive long-term solution to the safety and capacity issues, the full length of the project is being designed to AASHTO standards. An explanation of the design elements included in the typical section for the proposed alignments are offered in the DEIS and FEIS Section 2.4.2. (2) See General Response Safety-4 regarding making

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			(1) Between the top of the Lewiston Grade and Thorncreek Road, ITD proceeded as if it were building a federal interstate highway across the barren plains of Southern Idaho, cutting a terrific swath and constructing an overly broad roadway, apparently well over 100 feet wide including all affected land. I don't have any effective way of measuring this distance amid moving traffic, nor do I possess a tape measure long enough if I could. It must be noted, however, the differences between Southern Idaho and the Palouse Hills of the North are marked. When I talked with him at the January 22 hearing, supervisor Ken Helm told me that IDT is applying a federal standard to the proposed project, but I have to ask if this is necessary for a state highway. Mr. Helm said he is requesting a 30 foot "clear space" and that was what he would get. I emphasize that no one is arguing against safety here. Though this section is cited as among the most dangerous, there are many improved miles of Highway 95 that are still two lane or, where additional lanes have been added, that use center dividers. Couldn't this section be streamlined and made safer with a more moderate approach--without scarring such a broad area and destroying many acres of prime farmland? A wide median is really only required at the points where traffic enters and leaves the road, based on Mr. Helm's need for a place where vehicles can stop between traffic lanes while crossing it. For most of the length of the proposed improvement--indeed for the	smaller improvements along the existing US-95 alignment including the use of median barriers, widening, flattening and straightening the existing roadway. ITD will work with farmers and other landowners during the design process to identify ways to further minimize impacts to farms and the Palouse landscape. Mitigation measures are listed in Chapter 9, Environmental Commitments. (3) See General Response Weeds and Wildlife regarding the Palouse remnants and Paradise Ridge as well as the past, present and potential future commercial and the private development. See General Response Weather-2 regarding the referenced data set in the weather analysis and how it relates to the larger 30+-year data set. ITD recognizes that there is existing development on Paradise Ridge and that the development could continue; however, this is subject to the local planning regulations. The action alternatives, including E-2 would have Expressway Access Control, which would help reduce the potential for development off of US-95. See General Response Access. Visual and noise impacts are discussed in the DEIS and FEIS Sections 4.11 and 4.12 respectively. (4) The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3, which compares the crash data and safety of the Action Alternatives to the No Action Alternative, which is the existing roadway conditions projected to the 2037 design year.

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			Lewiston Grade/Thorncreek section--a center divider would seem to be more than adequate. (2) As I've driven this section of highway over the last month I've thought to myself that it really isn't that bad. With a little ingenuity it could be widened as required with added lanes, straightened in sections, and some of the grades could be reduced. Surely with the technology that exists now, the current roadway could be much improved and made vastly safer. Drivers would benefit, and those who farm adjacent lands could still farm them. It seems that much could be done without displacing those who live along the current highway and are accustomed to living along it anyway. If this is the C-3 option then so be it, but I feel that ITD could have made a more thorough investigation of the current road bed and possible improvements along that route. (3) Much has already been said in other forums of the sanctity of Paradise Ridge, and I reiterate my opposition to the E-2 option. This is another area that should remain immune from alteration, especially considering that there are other viable options. The supposed safety of this route remains in question because of the anomalous weather sample that was conducted in 2005. E-2, above the other options, has the potential to affect the quality of life in the city of Moscow and surrounding countryside through increased noise and light pollution. Moscow is and has been a quiet town, but there are other factors that go beyond the numbers and whatever set of standards is being applied. I'm	

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			not an advocate of the houses that have been built on Paradise Ridge and would rather they weren't there, but carving a four-lane highway through that lush farmland--with its accompanying clear space and barrow pits--adds insult to injury. It is more than many who live here can bear. It would also seem inevitable that once this area is opened up, consequent commercial and residential development will erode the agricultural and aesthetic qualities of that area. The whole prospect south of Moscow is subject to further desecration. This is not merely misguided "environmentalism," but practical concern for the inherent and valuable qualities that make Moscow and the Palouse what they are. I'm speaking for regional character, healthy agriculture and its global significance, and the continued healthfulness of Moscow and its environs. (4) I feel a need to respond to one element of IDT's promotional campaign used at the Moscow open house. The introductory video stated that the accident rate of the Moscow/Thorn Creek section is four times as high as the newly improved Grade to Thorncreek section--a misleading and disingenuous comparison. The newly improved section from the top of the Lewiston Grade to Thorncreek was already much more tame. Lying predominantly within what was often called the "Genesee Flats," it bore little comparison to the section now in question. It was more level with fewer curves. The only meaningful statistic--and the only one that should have been cited--would have been a comparison of the accident rate for the	

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			Grade/Thorncreek section before and after it was improved. In conclusion, I would quote GeoNote #9 of the Idaho Geological Survey that describes the rich unpinning's of the Palouse landscape. State Geologist Roy Breckenridge summarizes it this way, "...The formation of the landscape upon which we live took place over millions of years. From the lava flows of 17 million years ago to the ashfall of 1980, the Palouse has been altered and shaped by a series of often violent natural events. This history suggests, for those of us who rely on the water, soil, and mineral resources of this area, how truly fragile the Palouse country is geologically and how difficult it would be to make another." I would simply ask that IDT seriously consider the qualities--including the beauties--and irreplaceable characteristics of the region and of Paradise Ridge in its final proposal for a safer highway, bearing in mind the fragile nature of the Palouse and its stature as an important world food source. Thanks for your consideration. John P. Snyder –	
E-74	LeNelle	McInturff	I recently submitted my comments on the US 95 Thorncreek Road-to-Moscow project via the US mail - in support of the E-2 alignment. In light of the fatality resulting from the accident on Reisenauer Hill on Monday, February 25, 2013, I am writing again today. PLEASE get the E-2 alignment approved and start	FHWA and ITD are aware of the existing safety issues but must follow the NEPA Process. The E-2 Alternative is FHWA's and ITD's Preferred Alternative primarily because it would offer the greatest safety benefit. See General Response Alternative. See General Response Schedule regarding the environmental process and the anticipated schedule. See General Response Safety-5

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			construction without further delay. E-2 is the only proposed alignment that significantly addresses the deadly curves and slope of Reisenauer Hill. Safety should be THE overriding concern with US 95. The straightest, most level roadway in this stretch will be the safest - the E-2 alignment. LeNelle McInturff 1330 Eid Road, Moscow, ID 83843 208-882-1300 lenellem@moscow.com	regarding improvements on Reisenauer Hill.
E-75	Mary	Fauci	Comments on US 95 Thorn Creek to Moscow DEIS – submitted 2/22/13 Mary Fauci 1117 Eid Rd., Moscow, ID 82843 I was saddened but not surprised that the ITD's preferred alternative is E2. I feel ITD did not participate in the NEPA process in good faith. They did not listen to members of their interdisciplinary team (IDFG, EPA, or USFWS) and the public, but rather went through the motions generating a DEIS to support their preferred alternative, basically one very similar to the original 10A from 1999. I have many concerns and comments about this project. I do think a four lane highway is needed and will be wonderful once completed. I prefer the C3 alignment for many reasons described below. I do NOT believe alternative E2 is the best choice, especially for the people who live in the project area and the Moscow economy. ITD's rationale that E2 is preferred is mostly based on safety and increased safety comes from fewer access points and less intersections. When I asked about limiting access on	The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, agencies, sending out newsletters, and conducting other public involvement activities as described in the FEIS. Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources. The E-2 Alternative is similar to the 10A alternative that was evaluated in an Environmental Assessment (EA) around 2002. One of the requirements of NEPA and the EIS process is that a range of reasonable alternatives be evaluated in the DEIS. There is no requirement to exclude reasonable alternatives because they had been previously considered as part of a separate study.

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			new alignments, I have gotten different answers. Will ITD really be able to purchase all of the right of ways with 100% restricted easements? Will ITD restrict new access on any new alignment chosen forever into the future? I ask because if any agricultural access changes down the road into a residential or commercial access, then there is no safety benefit of moving the highway away from the existing alignment or C3 alternative. I recommend using the existing highway alignment to fullest extent possible to limit effects on environment. I suggest fixing the problem areas and dealing with existing residents and business approaches rather than making a new highway on undeveloped ground. There is lower construction cost for C3 than for E2. This is a good reason to pick C3. In preferring E2, I understand ITD's desire to build a new road without having to restrict and control traffic. However, when I think back, I can't remember the delays when the four-lane from Thorncreek to the top of Lewiston Hill was constructed. I lived through it and travelled back and forth to work through it. But I don't remember it. Although the total cost for C3 is higher than for E2, I'd rather pay wages for highway traffic control than increased costs for more right of way, easements, and prime farmland purchases (most of which will benefit a few individual landowners). Safety is not adequately addressed in the DEIS. Moving the highway to the E2 or W4 alignments would limit most of the local resident's use of highway 95. Emergency vehicle response time to	During the DEIS, the E-2 Alternative was one of the alternatives reviewed by the public during the first and second levels of the screening process. The rationale for forwarding it for detailed analysis in the DEIS and for identifying it as ITD's Preferred Alternative is summarized in the DEIS and FEIS Section 2.6. FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Agency regarding the difference in opinion regarding ITD's Preferred Alternative. The E-2 Alternative would have Expressway Access Control which would restrict any new non- agricultural accesses onto US-95 as described in General Response Access. Residents on existing US-95 would still be able to use the existing US-95 loop and they would be able to access the new US-95 alignment similarly to existing conditions. See General Response Safety-4 for a discussion of smaller improvements on the existing US-95 alignment. Emergency vehicle response times will not change for residents along existing US-95 as emergency vehicles may continue to use the existing highway. Emergency services would not be reduced as a result of the roadway improvements. The travel on the new alignment would result in a safer and slightly faster. See General Response Safety-3 and Safety-6. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a).

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			accidents on the new highway might be better, but the local residents will see reduction in emergency services. The C3 route would keep more residents closer to highway access. Reisenauer Hill is a safety hazard. ITD should fix the problems there rather than turning this stretch over to the county highway district. School bus routes for both Moscow and Genesee school districts use Eid Road and I recommend improving highway access to and from Eid Road (C3 or W4) rather than making it more difficult (E2). I am not in favor of realignment away from the business section of highway 95 at the South entrance to Moscow (north end of project). This area hasn't seen economic growth like other areas in Moscow and many store fronts are vacant probably because of the uncertainty of the proposed highway project. In the future, it is unclear that the businesses along the existing road will be viable if alternative E2 or W4 is chosen. A one mile stretch of business access (C3) isn't going to snarl traffic along highway 95 like up in Coeur D'Alene, but it will allow travelers the mental stimuli to transition into slower speeds before entering town. So there is a safety benefit. I think it is important to the economy of Moscow to retain some business access to highway 95 at the south end of the City. E2 will impact more Palouse Prairie remnants than C3. The weeds and listed species effects are real concerns to me. Many plants and animals are unique and if we can avoid impacts to a much endangered ecosystem, we should. In addition to the pygmy	While cost is a factor in identifying the Preferred Alternative, it is not the prime factor. Safety, social effects and protecting the natural environment are other key factors that were considered. General Response Maintenance-2 explains how the existing safety deficiencies would be addressed on the existing US-95 section. The C-3 Alternative would be closer to existing accesses but as a result, it would have more access points and a longer five-lane section and more turning movements, which would contribute to it having higher crash rates than the E-2 Alternative. See General Response Safety-5 regarding Reisenauer Hill. School buses and emergency vehicles would still use Eid Road and would access US-95 as they do today. Business access to US-95 at the south end of Moscow will be retained with the E-2 Alternative. Many of the businesses that front the section of US-95 that would be turned over to the North Latah Highway District are not dependent upon drive by traffic. See FEIS Section 4.1.2 and FEIS Section 6.1 for additional detail. The E-2 Alternative would not directly affect any Palouse remnants but would be closer to Paradise Ridge compared to the other action alternatives. See General Response Weeds and Wildlife. Additional information regarding the giant Palouse earthworm, pygmy nuthatch and Spalding's catchfly was added to the FEIS Section 3.8 and 4.8. The DEIS Section 1.1 explains why multiple wildlife studies were completed. See General Response Water regarding effects to wells, springs and groundwater.

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			nuthatch, long-eared myotis bat, and Spalding's catchfly, the Palouse earthworm has been found in a prairie remnant very near the project area. We know so little about this species. They may exist in remnants slated for destruction, why risk further damage to its known habitat, uncultivated prairie remnants? Keep the highway along existing road route. Big game like moose and elk pass between Bald Butte and Paradise Ridge crossing highway 95 near Southern end of project area. They will cross the highway with all of the alternatives, but I am humored that ITD didn't like report from IDFG and hired another wildlife consultant to provide expert opinion that suits their needs. I had a moose in my yard Feb 9 and 10, 2013. The large road cut across the flank of Paradise Ridge from the E2 alignment will probably affect surface springs such as historic Steven Springs and other shallow springs used by households. Will Steven Springs still exist if E2 is built? The cuts from C3 will also affect the surface hydrology, but to a lesser degree. Since most residential wells are in the Wanapum aquifer that is recharged from surface water, any changes to the hydrology from the large road cuts associated with the new alignments have the potential to affect wells in the project area. Alternative E2 will directly affect more residential wells. The indirect effect of the alternatives is unknown, but since there is more rainfall along the east corridor, one would expect E2 to impact this more than other alternatives. More wetlands will be	See General Response Weather-3, Weather-4, Weather-5, and Weather-6 regarding elevation, ice, snow, fog, and wind. The responses to comments from agencies and jurisdictions are presented in this FEIS Chapter 10. See DEIS and FEIS Sections 4.11 and 4.12 regarding visual effects and noise effects, respectively.

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			impacted by E2 than C3 and these areas are important for aquifer recharge. ITD is making a big mistake not addressing wind speed with alternative E2. I walk from my house at 3100' elevation down Eid Road into the Hidden Village trailer court to catch my carpool and the wind difference from the proposed overpass location on Eid Road to the existing alignment is substantial, especially in the winter time. Why keep the road at elevation when fog, snow, ice and wind are worse at the elevation of Reisenauer Hill than along the existing alignment? The aesthetic value of the Palouse landscape is a valuable commodity. A large road cut across the prominent high vista, Paradise Ridge will detract from the picturesque view if alternative E2 is built. Also the nuisance noise impact from trucks revving up or braking down the hill of proposed E2 at the northern end of the project will be worse than the C3 alternative. I expect the ITD decision makers to objectively reevaluate this project. They should take into account the recommendations of the other government agencies on their IDT team, the City of Moscow, and the local residents. The preferred alternative should be C3. It will results in an improved safer road that balances the needs of residents, local economy, thru traffic, and environmental concerns.	
E-76	Tom	LaPointe	Hello and thanks for this opportunity to comment on the proposed reroute of US 95 between Thorn Creek and Moscow.	Idaho's Transportation Investment Program is a multi-modal program that includes highways, bridges, public transportation, railroads, aviation, and non-motorized

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			I am writing because I believe that none of the alternatives deserves to see the light of day. We need more and better roads, but the 95 improvements have been a jury rigged and compromise solution which are not worthy of our state. Here's why: 1. Every region in Idaho EXCEPT for Region 2 has Interstate roads and funding. 2. Much more money is spent in these other regions than is the case in Region 2. 3. Region 2 is the largest geographically, but the smallest region in terms of population. 4. Because of the above, road building needs are greatest in Region 2, yet total road building funds are the smallest available. 5. To remedy this, you need to come up with a funding scheme using "Interstate Funding Replacement" dollars to answer the needs of Region 2, as has been done in other states (Example: Minnesota). Once you do this, you will be able to devote the funds necessary to accomplish more than the existing "band aid" approach. Specifically, Moscow needs a west side bypass to route traffic around Moscow. Thank you. Cheers! Tom La Pointe 409 North Grant St., Moscow, Idaho	transportation. The program outlines funding priorities by District. State funding for each District is allocated to the identified priorities. In District 2, improvement on this section of US-95 between Thorncreek Road and Moscow is the highest funding priority. Funding for each of the Districts is determined by lane miles within those Districts. While District 2 does not have any interstate there are four-lane roadways, which are considered when calculating the funding amounts for each of the programs outside of the Interstate Program. We do not anticipate a change in this calculation method because District 2 does not have any Interstate roadways. See FEIS Section 8.4 for additional information regarding funding. The west side bypass in Moscow may be similar to the Ring Road concept being proposed. The Ring Road project is a separate project with an independent purpose and need. ITD will continue to coordinate with the City of Moscow so that the design of this project will not preclude the Ring Road concept.
E-77	Carolyn	Hovde Bohach	To whom it may concern: I am a long time resident of Moscow. Although not chosen by the ITD, I strongly believe	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient

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			the best plan for the people of Moscow is the C-3: The Central Alternative for the following reasons: 1. C-3 is the most fiscally responsible because it results in ONE highway for us to maintain. The E-2 Eastern Alternative creates a completely NEW road, so that we will have TWO roads to maintain……(one by the state and one by Latah county). 2. C-3 is safest because it will improve a dangerous 2-lane highway. The E-2 Eastern Alternative will leave this dangerous road in place and it will be used by many people who will find access to the 2 lane highway the easiest, due to their location. 3. C-3 will result in the least nose and light pollution for Moscow. 4. C-3 is the most convenient because it has the most access for people to use the road. The E-2 Eastern Alternative has only one access point. 5. C-3 would likely be chosen as the best alternative if ALL THE FACTS were carefully checked and reported. ITD favors E-2, but their conclusion is based on some incorrect information about the number of businesses and residents that would be displaced by C-3. 6. C-3 will result in people who have a business or a home on a highway…..continuing to have a home or a business on a highway. E-2 creates homes that never thought they would be on a highway…..being on a highway. Carolyn Hovde Bohach 300 Rose Court, Moscow, ID	transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Maintenance-1 and Maintenance-2 regarding maintenance of existing US-95 loop that may be turned over to the NLHD and the existing deficiencies. See General Response Safety-3 regarding how the safety of the existing US-95 is considered in the revised safety analysis. The E-2 or C-3 alternatives would not result in noise impacts to businesses or residents in Moscow per FHWA criteria. See FEIS Table 57 Noise Effects. Regarding the fewer access points for the E-2 Alternative, E-2 would have two access points, one at each point where it connects to existing US-95. While the greater number of access points for the C-3 Alternative may be more convenient, it also contributes to the higher predicted crash rates. Please see General Response Displacement-1 for clarification of residential and business impacts.
E-78	Don & Twila	Brown	We would like to comment on the proposed realignment of hwy. 95. We received a flyer taped to	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking

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			our door to sign a petition against putting the road to close to paradise ridge. This prompted us to comment to you about our feelings on this matter. We would like to say that we have the upmost faith in the engineers and staff of the ITD to make the most sensible choice because that is what they are hired to do. We live on the south side of Moscow where we will see any route you choose coming in to town. We believe that the east route makes the most sense because there will be less good quality farm ground affected, it is the shortest route, it looks like the most consistent grade, has the least amount of roads that will enter this stretch of hwy and hopefully disrupts as few peoples residences and property as possible. We hope this project proceeds as soon as possible to prevent more major accidents on the current stretch of hwy. The current hwy. has many up and down elevations where you drive in and out of fog and black ice. This causes drivers to be caught unaware especially drivers that aren't familiar with the hwy. a more uniform elevation would make this much safer. The corners are not easy to navigate when weather is not ideal for travel. We do not feel the elevation will be any higher than the current elevation of Reisenauer Hill which is not usually as snowy as the passes to the north. If we can be of any help speeding up this process we would be happy to help. Sincerely, Don and Twila Brown 653 Indian Hills Dr. Moscow, Id	into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Displacement-1 offers clarification of residential and business impacts. See General Response Schedule regarding the environmental process and the anticipated schedule. Additional clarification regarding elevation, ice, predicted snow, fog and other and weather related driving conditions is provided in General Responses Weather-3, Weather-4 and Weather-5.
E-79	Joanna	Holder	Public comment for U.S. 95, Thorncreek to Moscow This portion of highway is highly unsafe for travel during any inclement weather. Please see below	FHWA and ITD are committed to completing the EIS process and implementing an effective solution. See General Response Schedule regarding the required

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			article from the Lewiston Morning Tribune. This delay was completely unnecessary. My family is heavy users of this highway, personally being involved in an accident at the end of February 1996 on this same exact stretch of road as the current victim. Please consider the latest fatality when weighing the scheduled completion of this LONG overdue project. How many more people will die from our unsafe highways for no reason? I urge the ITD to finish the upgrade to Highway 95 as the completion is imperative. Joanna Holder 2314 Blaine Road, Moscow, ID 83843 SPOKANE — A Lewiston man has died from injuries sustained in a serious vehicle-versus-pedestrian accident Monday morning south of Moscow. Shane M. Moyer, 34, had been listed in critical condition at Providence Sacred Heart Medical Center in Spokane. The Idaho State Police said today he has since died from his injuries. Moyer was hit by a vehicle coming from the opposite direction while standing outside of a parked tractor-trailer about five miles south of Moscow on U.S. Highway 95. He was airlifted to Sacred Heart following the collision.	environmental process and the anticipated schedule.
E-80	Keith	Smith	Comments on Highway 95 Thorncreek Road to Moscow Keith Smith 1117 Eid Road Moscow, ID 83843 I agree that the current Highway 95 is in need of improvements. There are way too many accidents on the section from Thorn Creek to Moscow. The	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety

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			road is too curvy, narrow and the intersections with other roads are poorly designed and dangerous due to poor visibility and no acceleration or turn lanes. Of the four alternatives: Do Nothing, W4, C3, and E2, I strongly favor C3. I am strongly opposed to the E2 alternative and I don't think the "Do Nothing" or the W4 options are going to go anywhere. I don't agree with most of the talking points given by ITD supporting the E2 alternative. I feel like it is the favored option because it will be easier for ITD to build because there will be less traffic to deal with, and because they have had their minds set on that route from the very beginning, but in the long run I don't feel like it will be the better route. As a local resident in the Moscow area, I would prefer to see the highway stay as close to it's current location as possible. I would have preferred the old C1 route, but the next best option I think is the C3 route. One of the main disagreements I have with the E2 route is the way the safety was calculated. It does not take into account the fact that the old road will still be used by most of the local residents because there will be no access points to conveniently get on the new highway, therefore forcing the local residents to still use the old road. The old road is not likely to get fixed and made any safer, and there will likely be less snow removal and maintenance than there currently is. Therefore the accident rate for the local residents will likely go up and those accidents are not included in the E2 safety prediction. The C3 route allows access to more local residents giving them a safer route. I feel the E2	benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, agencies, sending out newsletters, and conducting other public involvement activities as described in the FEIS. Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources. The Safety Analysis was revised in response to public comment and considers safety of the existing US-95 loop; however the relative findings stated in the DEIS remain valid. See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). See General Response Maintenance-1 and Maintenance-2 regarding maintenance of the US-95 loop. While the C-3 Alternative would provide more convenient access for those along its route, those access points contribute to higher predicted crashes. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). General Response Access provides updated information regarding Access Control for the action alternatives. While the C-3 Alternative would have less environmental impact for some resources, the E-2

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			route is only safer because access is denied to the local residents, forcing them to go around the new highway, and not use it at all, and instead use a dangerous route. Where is the safety improvement in that? Why aren't those probable accidents included in the E2 route's safety predictions? It is easy to make the E2 route look safer by making it difficult for locals to drive on it. I also favor the C3 route over the E2 route for a number of environmental reasons. C3 has less impact on wetlands, ungulate habitat, pine stands, and especially Palouse Prairie remnants. I really care about this. I think the C3 route; using more existing road location would have less environmental impact than a totally new road. The E2 route would disturb more wet lands, introduce more weeds to the fragile and threatened Palouse Prairie remnants, and possibly dig up Palouse Giant Earthworms, a poorly studied rare species. It would go closer to deer, elk and moose habitat increasing the likely hood of collisions with them, especially in the fog. I also think that seeing the highway up on Paradise Ridge would be very offensive to look at. Moscow is a beautiful place to live and I think that would have a very negative effect on the appearance of our community. I understand, from a highway engineer's perspective, that may not be a negative effect, but to me it is. I would prefer to impact as little land as possible to fix the highway. Once a road goes in, it does not go away. The E2 route is almost all new road, whereas the C3 route uses a lot more existing road. I think	Alternative would not affect any critical or high quality ungulate habitat, nor would it directly affect any Palouse remnants. See General Response Weeds and Wildlife regarding Palouse remnants and Paradise Ridge. Additional information regarding the occurrences of Giant Palouse earthworms and potential impacts to them have been added to the FEIS Sections 3.8 and 4.8. See General Response Safety-2 regarding wildlife collisions. Regarding the view of the highway on Paradise Ridge, the E-2 Alternative would not be on Paradise Ridge but would be lower in elevation along its base. See FEIS Section 4.11 for additional information regarding visual effects of the alternatives. General Response Weather-2 addresses the five-month data set and how it relates to the larger 30+-year data set. General Response Weather-8 addresses the validity of the Weather Analyses. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, ice, snow, fog, and other weather conditions. The increased access and the five-lane section at the northern end of the project could result in more accidents, congestion and possible strip development in that area and therefore is not preferred by the City of Moscow. See the additional information and clarification in FEIS Section 4.1. See General Response Safety-3 regarding how safety of the existing US-95 is considered in the Revised Safety Analysis (ITD 2013). The alternatives would have Expressway Access Control, which would restrict any new accesses onto US-95 as described in General Response Access. The amount of

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			that is a strong point in favor of the C3 route. Impacting less undisturbed land means less new right of way, less farmland taken permanently out of production, less new environmental damage, and less disruption to existing residents and businesses. Businesses and residents that are currently next to Highway 95 have been expecting the expansion of the road for a long, long time. To move the highway to a totally new location and reroute it into town from a different direction does not make much sense to me. The City of Moscow favors the C3 route too. It goes better with their land use goals and plans for a future ring road. I feel the weather section of the environmental impact statement is very flawed. I live on the shoulder of Paradise Ridge and I drive down Eid road every day. There is nothing you can say to convince me that the weather is the same on both the C3 and E2 routes. It is absurd to even suggest that they are. There is much more wind, fog, snow and ice higher up on the ridge. I see it every day in the winter when I drive by. There is an obvious line of snow on paradise ridge and the proposed E2 location is right in that transition zone. There is frequently orographic fog that sits on the top of Paradise ridge all day long in the winter and it does not exist lower down the mountain. I know for a fact that would make driving conditions much worse than the current location, no matter what your "weather expert" says. I think the proposed bridge over Eid road would likely be a very windy spot and a	impervious surface from both the proposed alternatives and the remaining US-95 loop road has been added to Section 4.8, Water Resource Effects. For clarification, the C-3 and Modified W-4 alternatives would impact 100-year floodplain and E-2 Alternative would not impact 100-year floodplain. See General Response Displacement-1 for a clarification of the residential and business impacts. In this section of roadway, turning movements contribute to the highest number of accidents. Increasing assesses and approaches onto US-95 would introduce additional safety risks even with turn lanes and modified approaches. Access points along winding and hilly topography reduce sight distance and create safety risks; therefore, the grades and curvatures of the alignments were improved and access points were limited to create the safest route. See General Response Safety-6 regarding the significance in difference of the length and safety between alternatives.

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			particular hazard to vehicles with a lot of surface area like tractor trailers and buses. I'd hate to see a school bus get blown off the bridge. The weather data used on the DEIS was completely inadequate. They only used from January to May 2005, an unusually mild winter! What about Nov. and Dec.? Some of the nastiest storms occur during these months. I suppose you probably chose that time period to demonstrate that the weather will be the same. Why didn't it get information from a 10 year average? Another problem I have with the E2 route is that ITD claims that it will be safer because there are fewer locations for traffic to get on and off the highway. Despite my feelings that it is wrong to deny access to the local residents in order to improve the appearance of a safer road while making the local residents travel on an unsafe road, I don't know that this "unblemished" road can remain "on-ramp free". I have gotten conflicting answers when I ask ITD people if new access points can be added after the highway is built. If an adjacent landowner wants to put in a sub-division, or gas station, or some other type of business can ITD really stop them? I have gotten yes and no answers on this question. If ITD cannot stop new access to the highway, then the E2 route is not really as safe as it is predicted to be, and is only encouraging urban sprawl. I think the highway should stay about where it is now. Then you know what you have to deal with. As far as the issue of reducing access points to improve safety, it seems to me that properly	

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			designed access points with good visibility, acceleration lanes, turn lanes, and possibly frontage roads where needed is very safe. It works fine by Genesee, Thorn Creek and all the other locations on the new section on 95 where you allowed access on that part. In fact you allowed quite a few access points on that section, why the change on this section? I don't think a few access points would be a bad thing. It seems to me like the small number of access points on the E2 route is ITD's strongest argument for that route, but I don't think that is a good enough argument to make it the favored option. In fact I think it is a distinct disadvantage. The E2 route is less than 1/10th of a mile shorter than the C3. That is pretty insignificant. The costs are very similar, and the resident displacements are similar. But the environmental impacts are worse for E2, and I fear the safety of E2 is worse. The weather on E2 will be worse, the appearance of the highway from town will be worse. I really don't see the attraction to the E2 route. Here are the talking points ITD uses to support the E2 route and my comments on them: E-2 (Preferred Alternative) E-2 would be aligned east of existing US-95 near the base of Paradise Ridge. This alternative is 5.85 miles long transitioning to a four-lane with center turn lane, curb, gutter and sidewalk for the last 0.24 miles at the northern end of the project. The evaluation of effects during the screening process and the detailed analyses presented in this DEIS resulted in the lead agencies, FHWA and ITD,	

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			identifying the E-2 Alternative as the Preferred Alternative for the following reasons -It would have the greatest safety improvement (I disagree with this because it does not take into account the local residents having to use the old road because they are denied access to the new highway, and because of the weather being worse in the higher elevation.) • It would have the fewest access points (I think this is a disadvantage. What is the point of building a new road that the local residents can't use?) • It would have the shortest length with the shortest travel time (shorter by less than 1/10 of a mile, less than 6 seconds faster) • It would the least effect to streams (Both C3 and E2 have 5 stream tributary crossings, but E2 would effect twice the acreage of wetlands and two wells, not to mention the fact that it will increase the amount of impervious surface due to the additional pavement of a second road.) • It would have better weather conditions for driving than W-4. (But not better than C3) • It would avoid effects to cultural/Section 4(f) resources, floodplains and business Displacements (so do the others) • It would best meet the project purpose and need. (I disagree because of the above comments) The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge which provides moderate ungulate habitat and E-2 would also affect pine stands that are potential long-eared myotis,	

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			northern alligator lizard and pygmy nuthatch habitat. (As well as the detrimental effects to Palouse Prairie remnants, possible encounters with Palouse Giant Earthworm, the fact that IF&G specifically recommended against E2 because of it's effect on wildlife, and the ugly scar across Paradise ridge that would be visible from Moscow, the large amount of farmland taken out of use, just more paved road surface in general.) Here are the ITD comments on the C3 route and my comments on them: C-3: The C-3 alignment would run closest to the current highway near the center of the corridor. (I think that is a very good thing.) This alternative is 5.94 miles long transitioning to a four-lane with center turn lane, curb, gutter and sidewalk for the last 1.42 miles at the northern end of the project. (It will blend in better as you come into town and not look like the highway was an afterthought.) It would have the highest crash rate of the Action Alternatives. (I don't believe that is accurate since it does not take into account the local residents crash predictions on the old highway location or the inaccurate weather data.) It would require the least amount of new right-of-way compared to W-4 and E-2 because it would utilize some of the existing roadway. (This is good) C-3 would have the greatest adverse effect to residences, businesses, and would encroach on the greatest number of hazardous material sites. (These residences and businesses are already near the	

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			highway, some of them because they want to be. It may be better for the businesses. Maybe the hazardous material sites would get cleaned up.) It would have the longest urban section that would operate at a LOS B. (better for businesses) C-3 would have the least wetland and wildlife species effects. (That's good) Similar to E-2, C-3 would have the fewest tributary crossings but would affect three times more linear feet of tributary channel compared to the E-2 (but less effected wetlands, less total impermeable paved surface, and better for wildlife) Alternative. Also, similar to E-2, C-3 would avoid cultural/Section 4(f) resource effects. (they all do) In conclusion, I think the C3 route is by far the better route. I think IDT manipulated the facts to make the E2 route look better because that is the route they prefer to build. I think the C3 route is safer, better serves the public, is more aesthetically pleasing, and is less harmful to wildlife, Palouse Prairie, wet lands, and host of other environmental aspects. I think the E2 route would be an ugly scar across the landscape, not nearly as safe as predicted, and would not serve the public very well. I would like to see IDT put their egos aside and listen to what the local residents of Moscow have to say. After all, we live here.	
E-81	Mark	Hume	Jim Carpenter: I have been part of presentations and hearings regarding improvements to US 95 south of Moscow since the earliest hearings, I have studied the video, and consider myself well read on this issue. I strongly oppose the E-2 route over Paradise Ridge	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Responses Weather-3, Weather-4 and Weather-6 regarding elevation, snow and wind. See General Response Safety-2 regarding wildlife

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			for the following reasons: * It is the least safe route... I am a general contractor and have many winter experiences with this area in winter. The weather is always more severe, it is colder, more windy and there is more snow on this shoulder of Paradise Ridge than in the existing c-3 route. * There is much more wildlife in the E-2 area and more interactions between traffic and game. * The existing route will continue to be used by local traffic, will continue to be dangerous, and will have to be maintained by Latah County. I strongly support alternative C-3 which builds upon the existing corridor, will be more easily maintained, and will consume the least amount of natural resources. Mark Hume 320 N. Adams, Moscow, Idaho 83843 markhumebuilders@gmail.com<mailto:markhumebuilders@gmail.com>	collisions. See General Response Safety-3 regarding how the safety of the existing road was considered in the Revised Safety Analysis (ITD 2013). General Response Maintenance-1 addresses maintenance of the existing US-95.
E-82	Mary	Ullrich	Dear Mr. Frey, Could you tell me what the regulations are regarding the ROW (new footprint) for a new 4-lane hwy? My understanding is that regulations say the least new footprint (ROW) should be used. Also, could you tell me who makes the final decision in the selection of a new 4-lane Hwy alignment? Specifically, I am asking who determines the best, most responsible alignment for the U.S.95, Thorncreek Road to Moscow Project? Thank you for answering my questions. Mary Ullrich	The decision of which alternative is selected will be based upon the ability for the alternative to meet the project purpose and need as well as the effects to both the human and natural environments. The amount of right-of-way is one of the many factors that must be weighed between alternatives. There is no specific requirement under NEPA to require or preclude selecting the alternative that requires the least right-of-way. FHWA is the federal lead agency and will select the alternative and issue the Record of Decision. ITD is a co-lead agency and the US Army Corps of Engineers

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			Steve and Mary Ullrich Paradise Ridge, Moscow, Idaho, USA	(USACE) is a cooperating agency. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Schedule for a description of the next steps in the environmental process and the anticipated schedule.
E-83	Mary	Ullrich	Mr. Frey, Thank you for your answers to my questions. Am I correct in my thinking that if more than one alignment is possible for a given highway realignment project and both are considered acceptable, the alignment that would take the least new ROW would be the preferred route? Thank you again, Mary Ullrich Steve and Mary Ullrich Paradise Ridge Moscow, Idaho, USA	The final decision of which alternative is selected will be based upon the ability for the alternative to meet the project purpose and need as well as the effects to both the human and natural environments. The amount of right-of-way is one of the many factors that must be weighed between alternatives. There is no specific requirement under NEPA that requires or precludes selecting the alternative that requires the least amount of right-of-way. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
E-84	Myron	Molnau	I looked all over for an address for this project but could not find one so I am sending this to you. I live in Moscow and drive to Lewiston and points south on occasion. I have always disliked this particular stretch of road, especially Reisenauer Hill where a good friend had a serious accident. I am all in favor of the easternmost route. It seems the most direct and best for safety, wildlife and the people living west of Paradise Ridge. Hurry up and build this before anyone else is killed or hurt! Myron Molnau 208-882-0257	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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E-85	Mark	Coleman	I am in favor of routing the Thorncreek project along the central route. It is less disruptive of new ground and will have much lower environmental impact than the eastern route. The eastern route will lower the quality of scenic view from Moscow area and degrade the environment across Paradise Ridge by developing much more new ground. The Eastern route will prove to be more dangerous during inclement weather. Fog and lower temperatures at higher elevations will cause obvious problems and occur more often than the lower elevation central route. I also do not understand why there has been no discussion of connecting this project to the planned rim road. If that proceeds east along University of Idaho property, the Eastern route will be a more favorable connection. Thanks for the chance to comment. Mark Mark Coleman 1512 Ridgeview Dr., Moscow, ID 83843-4514 208-310-0894	See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, temperature, fog and other weather related driving conditions. The Ring Road concept is discussed and clarified in the FEIS Sections ES 9, 3.2.3, and 4.2. Based on discussions with City staff as part of the Community Impact Assessment update (2011), a final detailed Ring Road alignment had not been identified and funding had not been allocated or secured to finance the project. The US 95 Thorncreek Road to Moscow project satisfies an identified purpose and need for improved highway safety and capacity independent of the Ring Road Project. Additional evaluation, a clear future funding source, and regional plan acceptance and adoption would be required to initiate additional infrastructure as part of this project.
E-86	Chad	Crow	To whom this may concern, I have been listening to the outlandish sequence of events that have been plaguing the Highway US 95 project since it has begun. As a hard working American who travels that highway every day for work, I must say that I think it is in the best interest for the IDT to make the new project as straight as possible. It looks to me that E-2 seems to fill this request. I also think that it is also in the best interest for the IDT to have the citizens in the best interest	The E-2 Alternative would meet that purpose and need and would provide the greatest safety benefit as explained in General Responses Safety-3 and Safety-6. The NEPA process requires evaluation of a range of reasonable alternatives and to consider their effects to the human and natural environment. Public involvement is an important part of the EIS process. ITD will consider and address all substantive comments to the DEIS and alternatives. General Response Alternative describes why FHWA and

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			and save as many lives as possible. I believe since I know the engineering code of ethics that it should be in their best interests as well, and I know it is. So why won't the IDT quit listening to all the environmentalists, and there bad morals and values, and do the right thing. Besides the thought of the straighter the road the less material that has to be moved. When you consider the alternate routes the outcome seems that they will have more of an environmental impact. It will cost the state more for the preventative erosion equipment and tools along the creek beds and draws. Not to mention all the material that needs to be moved for them routes. The whole idea was to make the road safer, hence the four lanes, so please make our tax money worth it and make the road straight and safe by choosing E-2. The local newspapers have been printing information that seems to be incorrect or one sided. Most of these things are seen in the letter to the editors. Thank you for your time, Sincerely, Chad Crow	ITD identified the E-2 Alternative as the Preferred Alternative.
E-87	Gary	Cummings	I would like to add my voice to those who would like this project to get moving as soon as possible. E2 seems to make the most sense, and I would like that to happen as soon as feasible. The amount of carnage on that road around Reisenauer hill has been terrible for decades and it is way past time for it to be done. Just recently another person perished on that stretch of highway. Please move this project along.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			Thanks, --Gary Cummings, Moscow	
E-88 (part 1)	Nancy Gary	Chaney Bryan	Dear Adam and Ken, Please find our comments on the DEIS for Thorncreek to Moscow attached. Hard copies with original signatures will be mailed to you today. Please know that the comments are ours as individuals, and are not intended to reflect opinions of any organizations with which we may be affiliated. Thank you for this opportunity. Sincerely, Nancy Chaney and Gary Bryan 1333 Ponderosa Dr., Moscow ID 83843 (208) 882-9350	Thank you for your comments.
E-88 (part 2)	Nancy Bryan	Chaney Bryan	Nancy Chaney & Gary Bryan 1333 Ponderosa Drive Moscow ID 83843 – March 7, 2013 Idaho Transportation Department Office of Communications Attention: Adam Rush, Public Involvement Coordinator P.O. Box 7129 Boise ID 83707-1129 comments@itd.idaho.gov RE: Comments of DEIS for U.S. 95 Thorncreek Road to Moscow Project DHP-NH-4110(156); Key No 9294 Dear Mr. Rush and ITD: We appreciate this opportunity to comment on the Draft Environmental Impact Statement for the U.S.	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The information stated is consistent with information presented in the DEIS with the following clarifications: All of the action alternatives would result in a safety benefit over the No Action Alternative. In response to public comment, the Safety Analysis was revised and includes the existing US-95 loop as explained in General Response Safety-3. See General Response Safety-6 regarding the significance of the differences in lengths and safety between alternatives. This includes consideration of the existing US-95 section that would be turned over to the NLHD. Repair of the existing US-95 loop is addressed in

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			Highway 95, Thorncreek Road to Moscow Project. We agree with ITD's stated purpose to improve safety along what is now a 6.34-mile stretch, but strongly disfavor ITD's preferred alternative—preferring instead the C-3 route—for the following reasons, related to the points enumerated on page 15 of the DEIS. Safety. According to the DEIS (p.113), between 2002 and 2011, 40% of accidents within designated high accident areas were attributed to curves in the project area that have substandard geometry and narrower than standard shoulders. Between 2002 and 2011, approximately 40 percent of the accidents in the project area occurred while a driver was negotiating a curve. The predictive analysis seems to assume few if any changes to crash statistics along the existing central route, which certainly would not be the case if C-3 were selected. (On a highway tour, probably eight or more years ago, an ITD employee standing on the tailgate of his pickup told a group of us that regardless of which route might be selected—including the current alignment—ITD would make it safe.) The DEIS also neglects to point out that if the central route were abandoned in favor of E-2, and North Latah Highway District were to assume responsibility, the present deficiencies—including the most dangerous sections—would remain hazards for the traveling public, unless or until the District secured funding to correct deficiencies in engineering and deferred maintenance, and posted signs to reduce speeds. According to page 174 of the document, relative	General Response Maintenance-2. See General Response Safety-4 regarding making smaller improvements along the existing US-95 alignment. See General Response Safety-1 regarding the adding a frontage road to the C-3 Alternative. The action alternatives would have Expressway Access Control as described in General Response Access. Mitigation for impacts to resources including streams, wetland, and wildlife is described in the FEIS Chapter 9, Environmental Commitments. The Paradise Ridge Challenge Course has been added to the map in the FEIS Section 3.1. See Displacement-1 for clarification of the displaced and impacted residences and businesses. Displaced noise receptors are clarified in the FEIS Section 4.12. See General Response Weather-1, Weather-2, Weather-3, Weather-4 regarding the weather analysis data, elevation, temperature, snow, fog, wind and other weather related driving conditions. Regarding noise impacts to future development, ITD cannot predict what the future development will be however; the results from the Noise Analysis will be provided to the jurisdictions for their planning purposes. The E-2 Alternative would not have any construction on Palouse remnants. See Weeds and Wildlife regarding the effects to Palouse remnants and Paradise Ridge. While E-2 does impact CRP lands, enrollment of land in the in the CRP program is voluntary, temporary and with no assurance of CRP land remaining undeveloped in the future. Landowners can determine whether to

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			safety of C-3 would be detrimentally affected by higher crash rates associated with 1.42 miles of proposed four-lane with center turn lane (like WA-DOT's Moscow-Pullman Highway 270, albeit with a slower 45mph speed limit), compared to just 0.24 miles for E-2, which would consist of mostly the four-lane divided highway with a 65mph speed. It seems realistic that slower speeds along C-3 would result in less severe accidents, and that providing for frontage road access and combining or closing existing driveways could reduce the number of intersections, and call for shortening the urban section at the north end of this project, and substituting strategically-located intermittent turning bays, thereby reducing costs as well as the potential for accidents. For those reasons, a modified version of C-3 is our preferred alternative. Access. According to the DEIS (p.37), limited access control would be applied to the highway, and existing approaches would be allowed to remain at locations where construction of joint access is not economically justified. The assumption that future policymakers will limit access points (p. 15) any more than previous policymakers have is flawed. The reason E-2 doesn't have as many points of conflict (22, compared to 47 for C-3) is that it hasn't been built. Realistically, new roads attract development, just as the existing route has, and as predicted on page 143 of the DEIS. The C-3 route could have a shortened 5-lane urban section, modified with limited access, turning lanes, etc. Effect on streams. C-3 and E-2 would each have five	leave lands in CRP or to withdraw them. Design visualizations from Moscow toward the proposed alignments are included in the Community Impact Assessment (HDR 2006) Appendix B and additional information was added to the FEIS Section 4.11. Effects to the giant Palouse earthworm were considered as stated in the FEIS Section 3.8 and 4.8 and in the General Wildlife Assessment (IDFG, 2006). Updated information regarding recent occurrences and habitat information has been added to the FEIS Section 3.8. Regarding the cultural resource surveys, the reports state that there is a low to moderate probability of encountering prehistoric sites, and the shovel testing was placed based in part by the results of the probability study. The shovel testing was not sporadically done but was intentionally conducted near sites near the alignments where there would be the highest probabilities of native American use, such as near streams, camas fields and hunting grounds. The Nez Perce Tribe was also consulted during the EIS process as described in the DEIS Chapter 7. Additional detail regarding the methodology of the archaeological surveys and the findings has been added to the FEIS Section 3.4; however, shovel testing is an acceptable method for field investigation. Field inspectors will be on-site during construction to identify cultural resources during soil disturbing activities in high probability areas for Native American sites.

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			tributary crossings, with C-3 affecting more linear feet of tributary channel (p.153). Compensatory mitigation with replacement of affected flows and functions of the tributaries will be vitally important, as with any modern road construction project. Effects on cultural resources, businesses, and floodplains. "The C-3 Alternative…had no adverse effects to historic resources and had the least wetland, cultural and visual effects compared to the other central corridor alternatives" (p. 45). According to the DEIS, C-3 would displace 7 residential units and 8 businesses, while W-2 would displace 5 residences and no businesses (p. 53), however references to "impacts" and "displacement" are inconsistent and misleading. Page 154 suggests that acquisition of right-of-way and removal of access are considered equivalents to displacement, even if mitigation could include providing alternate access. C-3 is believed by business owners to have the least indirect effects because the access would be similar to what exists, although it would be changed to a limited access facility (p.204). Traffic would continue to pass by the existing businesses, which would encourage businesses to stay or locate in the area (p.204). W-4 and E-2 would have greater effects to visibility and access to existing businesses; however; they could also potentially encourage growth in the area (p.204). Page 16 inaccurately indicates the C-3 "would have the highest business and residential displacements (eight businesses and seven homes)," when as pointed out elsewhere in the document,	

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			most of those would be "impacted" in some unspecified way/s. Realistically, at least in some cases, impacts of the project could be advantageous, increasing visibility of businesses, justifying frontage road access, or compensating the property owner to facilitate relocation to an even more desirable site. (Page 14 indicates that noise impacts of C-3 would cause one receptor to be displaced, while E-2, with the "highest noise impacts of the action alternatives" (p.15) would result in displacement of 5 of 7 receptors.) Regarding businesses that would be adversely impacted by E-2, I pointed out to the person attending the table at ITD's public hearing on January 23 that the Paradise Ridge Challenge Course (and corporate retreat meeting and events center) didn't even appear on his map of businesses. I even introduced him to Keith Haley who owns that business, but neither of us came away with the sense that it mattered, and I saw no evidence that the fellow was planning to add it to ITD's database for this project. Length and travel time. The distance differential between C-3 (5.94 miles) and E-2 (5.85 miles) is negligible (p.37). Nine one-hundredths of a mile is a mere 158 yards…hardly a strong argument for preferring E-2, particularly when weather conditions at that higher, more exposed elevation could impede traffic in winter weather conditions that residents in that vicinity report. Weather. Measurements for E-2 were documented for an uncharacteristically dry and mild season in 2005. Logic and local experience suggest that the	

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			higher elevation of E-2would expose drivers, especially in high-profile vehicles, to more wind, snow, drifting, fog, and other potentially hazardous weather conditions. Weather conditions for C-3 do not appear to have been characterized in this document. Purpose and need. It depends on whose. The stated purpose of this project is to improve public safety and increase highway capacity on US-95 south of Moscow between Thorncreek Road (MP 337.67) and the South Fork Palouse River Bridge (MP 344.00) (p.24). The stated need is that "US-95 is part of the National Highway System (NHS) and is a North America Free Trade Agreement (NAFTA) route spanning the United States from Canada to Mexico. Within Idaho, US-95 is classified as a principal arterial, providing the only continuous north-south highway connection between the Idaho Panhandle and the rest of the state. It supports multiple local uses, including primary access to agricultural, residential, commercial and industrial land located directly adjacent to the highway. Within the City of Moscow, US-95 connects with SH-8 which is a major east-west highway. The US-95 Thorncreek to Moscow project is included in the approved Idaho Transportation Investment Program (ITIP) (ITD 2011a)" (p.26). Allegedly, "(t)hese benefits would consist of improved safety, and increased capacity to accommodate current and future traffic demand" (p.193). We certainly support the purpose of safety, but think that C-3 would be safer than E-2. Turning historic downtown Moscow into an increasingly busy	

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			industrial through-route doesn't seem beneficial to the livability, desirability, or economic well-being of our community, including our pursuit of mixed-use zoning, to blend retail, office, residential, and entertainment uses together, but none of the alternatives include a bypass, which we would like to see included (and funded). Additional reasons we prefer C-3 over ITD's preferred alternative include the following: Farmland. C-3 would take up about half of the prime farmland as would E-2 (25.1 acres, compared to 50.8 for W-2 and 46.7 for W-4). C-3 would take up the least amount of wetlands (0.99 acres, compared to 3.61 for W-2 and 5.45 for W-4) (p.147). The C-3 Corridor has the fewest acres of prime and statewide important farmland. Approximately 8.8 percent of the land in this assessment unit is in CRP and planted with grasses. The C-3 Alternative would convert the least acres of prime farmland and farmland of statewide importance to other uses. The C-3 Alternative would utilize more existing right-of-way and would convert the least amount of farmland to other uses. E-2 would affect slightly more prime farmland than the other Action Alternatives. 27.7 percent of the land in the assessment unit is CRP land, primarily in the southern end of the corridor. However, the E-2 Alternative would affect the greatest acres of actively farmed land even after the CRP land is subtracted. E-2 would affect approximately twice as much CRP land compared to the other alternatives. Land acquisition. C-3 would take up less land for	

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			additional right-of-way (154 acres) than E-2 (207 acres) (p. 53). Visual impacts. pp. 181-182. Interesting discussion of visual effects of E-2, seemingly focusing on the perspective of the motorist entering Moscow from the south, rather than of a resident or visitor observing Paradise Ridge from town: The project would cause a high effect to residential viewpoints…Effects would be the result of grading, exposed soils, erosion, and unnatural slopes. The addition of a new highway, structures, development and vegetation removal would also potentially affect the visual quality…Continued development on Paradise Ridge would further degrade visual quality for residential viewpoints. Future transmission lines may potentially follow the alternatives' alignment to facilitate access and to consolidate impacts into a single corridor. This may further contribute to the additional contrast in the existing natural landscape (p. 217). Page 15 notes that visual impacts to Moscow residents were listed among specific concerns and controversy, however no virtual images were presented to demonstrate what development of E-2 might look like from the Moscow side. Ironically, references have been made to motorists' views from the highway approach into Moscow from the south and the prospect of a scenic highway on Paradise Ridge. Noise. The noise impacts were based on disruption of present conditions, not on the desirability of developing in the vicinity of any of the routes in the future, and were inexplicably deemed outside of	

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			project scope. (Page 14 indicates that noise impacts of C-3 would cause one receptor to be displaced, while E-2, with the "highest noise impacts of the action alternatives" (p.15) would result in displacement of 5 of 7 receptors.) Habitat. E-2 would have a significant and immediate detrimental effect on remnants of the endangered Palouse Prairie ecosystem, and what pieces were not wiped out immediately by construction would be threatened by introduction and widespread distribution of invasive weeds. Chapter 1 of the City of Moscow's Comprehensive Plan (1.4.2) advises, "Promote the conservation of valuable agricultural lands and Moscow's surrounding rural landscape…Promote the protection of the remaining areas of Palouse Prairie." The E-2 route is in conflict with those community values. Also, we believe that the Giant Palouse Earthworm also warrants consideration, listed or not. Livability/desirability of place. Few people choose to live along busy highways. They are noisy, fume-producing, and dangerous. If E-2 were selected, industrial use and large-scale commercial development might occur in sprawled and linear fashion, but would almost certainly have a detrimental effect on residential property values in the vicinity of that new section of roadway, while the abandoned section of the existing route would probably not be any more sought-after for residential purposes than it is now. The cultural resource inventory seems inconsistent with the literature review. The predominant focus is	

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			on historic structures, and the significance of thousands of years of intermittent activity by indigenous people seems minimized. According to the results of the technical report on all cultural resources, recorded and pre-recorded, in/abutting the project area "Seventeen historical properties—nine farms, four residences, one residence/commercial property, one historical trash scatter, one historical monument/trash scatter, and a road—were identified within the project area of potential effect (APE), that is, within 75 m (250 ft) of the W-4, C-3, and E-2 alignment centerlines, or immediately adjacent to this area (see Figure 2a and Appendix A)." The draft does acknowledge that "Despite the influx of Euro- Americans, Native American people continued to return to the Palouse highlands during this period for root harvests and other traditional activities" (p.4), but the proposed solution to uncovering prehistoric artifacts is, "In the event that previously unidentified cultural resources are unearthed during project activities, work should be halted in the immediate vicinity of the find and a qualified archaeologist contacted to assess the significance of the resource." (Cultural Resources Technical Report p. 8, RE survey done in August). Ironically, the likelihood of making such an observation from behind the controls of huge excavation equipment is not very probable, and the amount of destruction of a site that could occur under those circumstances is substantial. No effects on cultural resources were identified for either C-3 of E-2 (p. 147) however the Archaeological	

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			and Historic Survey Report (p.1) indicates that "Cultural resources may be expected along transportation corridors, near water sources, and in resource extraction locations (and) ethnographic literature notes Native American use of the project vicinity for root harvests, travel, and other activities. A cultural resources probability study…rates the probability of Native American archaeological resources within the current APE as low to moderate due to the ephemeral nature of prehistoric Native American activity in the area (however) ethnographers…place the current project within traditional Palouse and Nez Perce territories. Although permanent Palouse and Nez Perce villages were generally situated along major rivers, rich fields of edible camas roots, as well as an abundance of game, made the Palouse uplands a popular gathering and hunting destination… Local Native American peoples occupied temporary camps during seasonal resource collection trips. Although upland campsites are rarely mentioned in ethnographic literature, a Palouse camas-digging camp was noted in June 1855 along the South Fork of the Palouse River, several miles west of the current project…and a large Nez Perce camp was reported north of the project near the previously mentioned root ground." It seems to us that the C-3 corridor has already been disrupted by the existing highway, and that E-2 is less so It would seem that hunters and gatherers would be more likely to have camped—particularly if they had (pawing, defecating) horses—at an elevation above where they were digging for root	

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			crops, and that hunting camps were more likely to be nearer the ungulate habitat at the higher elevations. Attempting to identify those locations with sporadic test holes might not give a complete picture. (See "Shovel-Test Sampling in Archaeological Survey: Comments on Nance and Ball, and Lightfoot" by Michael J. Shott, American Antiquity, Vol. 54, No. 2 (Apr. 1989), pp. 396-404 Published by Society for American Archaeology; http://www.jstor.org/stable/281714.) Thank you for considering our comments in opposition to ITD's preferred alternative and in support of a modified version of the central C-3 alternative. Sincerely, Gary Bryan and Nancy Chaney C: Ken Helm, Project Manager, ITD, P.O. Box 837, Lewiston ID 83501	
E-89	Sandy	Ketelsen	I am letting you know that I prefer the E-2 route for U 95 Thorncreek Road to Moscow Project. I have lived on Martinson Rd most of my life and am so saddened about the loss of life on this road; this project has taken so long due to the group on Paradise Ridge opposing the best route and coming up with all these crazy excuses! Somehow they apparently feel superior and no one can come near their ridge where they live! REALLY? So sick of it and I sure hope the route ITD has chosen goes through and they don't come up with other excuses to delay the road being built. E-2 needs to happen! Sandy Ketelsen 1100 Martinson Rd	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. As part of the EIS process, FHWA and ITD will consider all substantive comments from the public.

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E-90	Steve and Mary	Ullrich	It might be too late for this input, but I noticed incorrect info in the brochure regarding displacements, here's a section from my letter to ITD describing how businesses and residents would ACTUALLY be effected, the EIS is wrong because there was not good communication between the right of way folks and the person who created the EIS. At the IDT Hearing, I also spent more than an hour talking with Tim Long, District Right of Way Supervisor, and Carmen Reese, Senior Right of Way Agent. We looked at which eight businesses would be displaced on alternative C-3. They informed me that in fact "no businesses will be displaced, and the widening of current Hwy 95 would have no effect beyond a potential noise increase". I was surprised that ITD had the "displacement of eight businesses" as one of its main four reasons for not choosing C-3 as its preferred alternative since this information is inaccurate. Tim Long wanted me to stress in this letter that "there is no definitive displacement of businesses (on C-3) and this is misleading to the public." I expect to see this information corrected in the subsequent IDT Hearing information boards and in the DEIS/FEIS. Another concern for Moscow and the surrounding communities is the displacement of residents. On February 11, 2013 I spoke again with Tim Long to clarify what we may expect for residential displacements. He said that E-2 would displace the most residents because of issues with a displaced well and that ITD had decided to relocate all of the	The discrepancy between displacement numbers in the DEIS has been corrected and clarified in the General Response Displacement-1 and throughout the FEIS. The displacement information in the DEIS was based on conceptual level information and potential impacts were distinguished from impacts where relocation is assumed. In addition, displacements that were presented in the noise impact tables were also clarified in Section 4.12 Noise Effects.

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			residences within the mobile home park and a house above the park on Eid Rd. He also stated that only one residence would be displaced along the C-3 route. This information is very different than that presented at the 01/23/13 public hearing and in the DEIS, which stated that C-3 would displace 7 residences and E-2 would displace only 5. It appears that there has been an error made in the information disseminated to the public and to the board making the final alignment decision. Lahde (remainder of text is email chain and not a substantive comment)	
E-91	Jim	Roach	Water Let there be no doubt, everyone has a legitimate argument over the Highway 95 expansion. Clearly, this is an emotionally charged issue. But I believe the Draft Environmental Impact Statement is inappropriately named. Mostly, we hear how many businesses or houses will be effected and how much will it cost. Mr. MacDonald followed the money. His research led to the trucking industry as the primary force driving the I.T.D.'s preference (E-2). Also, the state used extremely limited weather/climate data as "evidence" for their preferred alternative. So, call it what it really is - a Draft ECONOMIC Impact Statement. State officials seem to think the environment is nothing more than a quaint notion. Money, however... What happens when a new road is cut in? I'm no hydrologist, but the water table is substantially altered. Basically, a new road acts like a dam. It	The project purpose and need is to improve public safety and increases highway capacity on this stretch of US-95. US-95 is used for local circulation and access, commuters and regional travelers. It is also the only north-south highway in the Idaho Panhandle and therefore must consider truck traffic and international travel as well as local trips. The trucking industry does not fund or have special influence in FHWA and ITD identifying the E-2 Alternative as their Preferred Alternative. FHWA and ITD consider the effects to all users and all facets of the public. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. The purpose and need for the project is to improve safety and capacity for all users, which includes truckers and the industries that they support. FHWA and ITD

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			directs the water into neat culverts speeding the water down-stream. Most of it will never be used by surface flora. Nor will it replenish deep aquifers - our drinking water. This means less aquifer recharge and subsequently stricter water rules. New roads have an adverse effect on surface water, vegetation, increasing erosion, washing away valuable top soil and exposing useless under soil which only can support weeds. (www.transwildalliance.com/effects.roads<http://www.transwildalliance.com/effects.roads>). Surely farmers remember how the highway construction affected their land and water. E-2 means yet another road and guess what?... More environmental degradation as the tiny fraction of original prairie habitat remaining will be plowed under or die of thirst. I'm for C-3, another hearing, and extending the comment period again. Jim Roach, Moscow	have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources. See General Response Weather-2 regarding the weather data set. NEPA requires consideration of both the human and natural environment, therefore, the economic impact of the alternatives are one of many considerations when identifying effects. See General Response Water regarding the effects of the project on water tables and water supplies. Mitigation measures that will minimize harm to resources are discussed in FEIS Chapter 9. The action alternatives would not directly impact any native Palouse Prairie habitat or Palouse remnants. The comment period was extended to March 25, 2013.
E-92	Richard C	Heimsch	Attn.: Adam Rush As a 41 year resident of Moscow, ID I am writing in support of ITD's recommended route "E-2" for the improvement of US 95 from Thorn Creek to Moscow. I have studied the issues and the alternatives and I am in firm support of the proposed E-2 route. Further, I find the arguments made by those opposed to the E-2 route to be disingenuous and very self-serving, not based on the welfare of the general public, and based on emotion	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. During the EIS process FHWA and ITD will consider all of the substantive comments from the public.

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			rather than facts and expertise. This highway improvement project has been delayed too long (essentially a decade) resulting in many traffic deaths and injuries that could have been averted had the project been completed in a more timely fashion. I appreciate ITD's work and expertise that went into deriving the "E-2" plan and urge that ITD make the decision now (without further delays) and move toward the construction phase of the project as soon as is possible. Sincerely, Richard C. Heimsch 213 N. Howard St., Moscow, ID 83843	
E-93	Amy	Conway	Please adopt the central route and modify/update the existing road bed. Since the initial comment period, there has been another accident resulting in death. The accident was related to weather/ice/snow on the road. It is essential that the limited available resources are directed to fixing the existing road, and not adding a new road. Altering the course to the East or West will double the maintenance/plowing/clearing costs for the roadways. It seems that the current efforts for safety are not enough. Please add more warning/signage, and please promote clearing the roads more quickly. Amy Conway, Moscow, ID	See General Response Schedule regarding the environmental process and anticipated schedule. See General Responses Weather-3 and Weather-4 regarding elevation ice and snow and other weather related road conditions. Improving the existing road would not reduce the numbers of accesses or address many of the identified safety deficiencies such as curvature and grade. See General Response Safety-4 regarding making smaller improvements to the existing alignment. See General Response Maintenance-1 regarding maintenance of the existing US-95 loop.
E-94	Anthony	–	Please consider the following in deciding a path for the re-route of US95: Environmental impact is greater when constructing new roadway: the central route makes more use of the current road, which decreases pressure on	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2

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			remnant Palouse prairie -the central route offers more convenience to residents south of Moscow (and increased access to safety services through better road conditions -less division of farmland with choice of the central route Thank you, Anthony	Alternative as the Preferred Alternative. The C-3 Alternative would have more accesses and may be more subject to strip mall development due to the longer five-lane section. All Action Alternatives would have Expressway Access Control but the E-2 Alternative would have a shorter five-lane section, which would help minimize indirect effects resulting from induced development. See General Response Access. See General Response Weeds regarding effects to Palouse Prairie remnants.
E-95	Antone G.	Holmquist	For the record: I speak as a 39 year resident of Idaho and as a small business owner and a frequent traveler on Highway 95. I support Alternative C3 and I am adamantly against E2. For the life of me, I do not understand the zeal which ITD seems to have for the E2 alternative, despite the preference for C3 from other Idaho agencies such as Fish and Game. I am also an avid photographer and I am grateful that the owners of the Palouse Prairie remnants atop Paradise Ridge allow folks to walk on the ridge, with the understanding that we don't abuse the privilege. Last May and June, I did this 13 times, predominately to photograph flowers and insects. While up there I saw deer, hawks, and many bird species. The native prairie is spectacular, despite being such a small remnant. By moving the road up higher on the ridge, with all the soil disturbance and the much increased chance of invasive species migrating up to this remnant prairie, we would most	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Responses Safety-3 and Safety-6 regarding the findings of the revised Safety Analysis. See General Response Weeds and Widlife-1 regarding indirect effects to Palouse remnants and Paradise Ridge. See General Responses Agency regarding the difference in opinion regarding FHWA's and ITD's Preferred Alternative. General Response Safety-6 explains the significance of the differences in length and safety between alternatives. See General Response Weather-2, regarding the weather analysis data. See Safety-4 regarding smaller improvements along the existing US-95. The E-2 Alternative was identified as FHWA's and ITD's

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			certainly be impacting this remnant. It seems to me it would be much less invasive to fix the existing route, especially Reisenhaur hill. Fix that. There will, of course, be disruption to people's lives, including forced moves with either route, unfortunately. The distance difference of .1 mile is negligible. The safety estimates are close and there is a question of the methods for estimating accidents on E2, especially the inadequate weather data collected. There will be accidents on the existing route if E2 is built, also. Less than now, but these must be added to the figures given for E2. Why had ITD not lowered the speed limit, built more lanes, and otherwise fixed Reisenhhaur Hill after 10 years of inactivity? It seems to me the plan to ram E2 down our throats and increase the speed limit is for the benefit of a few, especially the Chip trucks for Clearwater Paper. Sincerely, Antone G. Holmquist 817 S. Jefferson St., Moscow, Idaho	Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer, financial or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources to the best of their ability.
E-96	Cathy	Willmes	Hello ITD members, Please add my voice to those urging the ITD to protect the Palouse Prairie remnants in the Hwy 95 project. I stand against the C2 route and can only hope you will go with another route. Thank you, Cathy Willmes	The C-2 Alternative was eliminated from consideration during the early screening process. See DEIS and FEIS Section 2.5.2. All of the alternatives evaluated in detail in the DEIS would avoid direct impacts to the Palouse remnants. See General Response Weeds.
E-97	Cheyenne	Smith	Hello, Please accept my comments regarding the potential impact of alternative E2 of the Thorncreek Road to Moscow project. I would like to voice my strong	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative

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			opposition to this proposed route (E2) because of the devastating effects it would have on our local, native habitat and prairie as well as both plant and animal species. It would affect twice as many prairie remnants as C3 or W4 and put a higher number of plant species at risk. It would affect twice as much wetland as C3 but not as much as W4. It would also put more remnants at risk of weed invasions, affect more acreage of forest, and affect more elk, moose and deer habitat. I understand this is a difficult decision with many stakeholders, but I hope the ITD chooses one of the other routes. Thank you for considering my comments. Cheyenne Smith PO Box 8686, Moscow, ID 83843 ck.smith@live.com<mailto:ck.smith@live.com	describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. None of the action alternatives would directly impact Palouse remnants; however, the E-2 Alternative would be located along the base of Paradise Ridge. See General Response Weeds and Wildlife regarding Palouse remnants and wildlife.
E-98	Dan and Patricia	Rathmann	We support Alternative C-3. This alternative has the advantage of "fixing what's broken" rather than abandoning ITD's responsibility for the existing roadway. This alternative C-3 also avoids the destruction of yet more open land. Dan Rathmann Patricia Rathmann Moscow, Idaho 208-882-8262 –	FHWA and ITD must evaluate and consider the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The C-3 Alternative would more closely follow the existing alignment and would have less new roadway compared to the other action alternatives but it does also have sections of new alignment that would require additional open land. See General Response Alternative for rationale for identifying the E-2 Alternative as FHWA and ITD's Preferred Alternative. General Response Safety-3 provides information regarding the updated Safety Analysis, which considers

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				the remaining sections of US-95. See General Response Maintenance-2 regarding maintenance of the remaining sections of US-95. See General Response Safety-4 regarding smaller improvements to the existing US-95 alignment.
E-99	David and Wendy	Waltner	Please make the highway from Lewiston to Moscow safer by fixing or bypassing Reisenauer Hill. If that isn't improved, it's not really fixing the majority of the danger areas. Please do your best to save lives. A Moscow family, David and Wendy Waltner	See General Response Safety-5 regarding improvements near Reisenauer Hill. See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013).
E-100	Diane	Baumgart	Brian Ness, I have carefully read the over 1000 pages of studies, documentation in the DEIS report, the responses of the Moscow City Council and the Moscow Planning and Zoning response to the ITD. I have attended all public meetings conducted by ITD this year and those in the early stages of this project. I strongly support the selection of C3 as the safest route, the route that ties into the City of Moscow long term planning for transportation projects, and the route that will protect our last Precious Palouse Prairie remnants. I understand that C3 may cause traffic delays and be an irritant and cost issue for The Port of Lewiston, Bennett Lumber, and other large multi-million dollar corporations/consumers of our highways. I have read their cost estimate in the public records. I understand the need to contain business costs but not at the expense of this particular environment. Not at the expense of Public preferences for C3. Not at the expense of some private landowners along	FHWA and ITD consider the effects to all users and are not influenced by special interest groups. US-95 is used for local circulation and access, commuters and regional travelers. It is also the only north-south highway in the Idaho Panhandle and therefore must consider truck traffic and international travel as well. The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3. The E-2 Alternative would not directly impact Palouse remnants but could have indirect effects due to weeds. See General Response Weeds. In response to public comment, ITD prepared a Mobility and Road User Cost Study (ITD 2014a), which is summarized in the FEIS 3.10 and 4.10. Wells, if impacted, will be relocated or decommissioned according to regulations. Wells will be marked on the plan sheets and considered during design and will be monitored. See FEIS General Response Water. See General Response Maintenance-1 and Maintenance-2 regarding maintenance and improvement of the existing US-95 loop.

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			the E2 route and recently purchased lands by developers along the C3 route. Not at the expense of polluting three wells and leaving the Latah County taxpayers with the current unsafe and unimproved stretch of road you call "the most dangerous stretch of highway" on U.S. 95. The large business interests transporting goods/products on U.S. 95 manage to make considerable profits during the improvements of the section of U.S. Highway 95 from Lewiston to Thorncreek. It appears this can and must be done again. It appears that interests besides safety and the reports and information provided by ITD are driving the route selection of E2. Sincerely, Diane Baumgart resident of Moscow Idaho	The action alternatives would have Expressway Access Control as described in General Response Access. Paradise Ridge is privately owned parcels and is already adversely affected by development. Mitigation measures for project impacts are shown in the FEIS Chapter 9, Environmental Commitments. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources.
E-101	Donn	Morse	As a homeowner living on Jacksha Road, with family members who travel US-95 daily, I want to endorse route E2. The straightest route (E2) is not only the most cost effective, but it's safer (by virtue of removing the curves). My hope is that the route selection can be expedited and construction begin asap. (Reducing the possibility of additional accidents and fatalities on the existing stretch of highway.) Thank you, Donn Morse	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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E-102	Duane	Dale	I am grossly late on commenting on the proposed options for Hwy 95 reconstruction, but thought I'd submit a comment anyway. I totally agree with FHWA's and ITD's Preferred Alternative: E-2. While those arguing against this raise concerns about the current Hwy 95 not being upgraded, travel on that roadway will be significantly reduced; leaving in my mind primarily persons who will be well familiar with the most dangerous spots on the road. It has been far too long, and too many lives have been lost since those opposed to the Hwy's placement in the area of E-2 began their fight against this so many years ago. It is time to begin construction of a roadway that will not only save lives, but will be more efficient in terms of supporting the ID economy. Thank you very much for your consideration. Duane Dale 345 Meadowlark Lane, Moscow ID 83843	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. See General Response Safety-3 regarding how the existing US-95 was considered in the Revised Safety Analysis (ITD 2013).
E-103	Garrett	Clevenger	Dear Idaho Department of Transportation decision makers, I am writing in regards to the DEIS for Highway 95, the reroute proposed to take place south of Moscow. Please except these comments and include them in the official record. For starters, the below online petition has to date gathered 530 signatures from mostly area residents who are opposed to ITD's preferred E2 route for a variety of reasons: http://signon.org/sign/idaho-transportation?source=c.url&r_by=5978043	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting

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			I have been following this issue since ITD first proposed rerouting Highway 95 up Paradise Ridge. I attended some of the informational meetings held by ITD back then and submitted comments at that time. I am glad that ITD proposed alternative routes in response to the opposition, as it seems only reasonable to have other routes to consider and to compare the Paradise Ridge route with. I am really hoping ITD will consult with Washington State to figure out how to make the highway more user-friendly for all residents on the Palouse. It makes sense to me to find a way to tie the highway in with traffic that is traveling to and from our neighbor state, which means rerouting the highway to the west. That way, truck and other traffic not intending to stop in Moscow would be able to bypass Moscow instead of causing congestion in the city as currently happens and will continue to happen if E2 is built. Washington may even share some of the expense which seems fair since some of the traffic that utilizes Highway 95 is Washington bound. Why make that traffic drive through Moscow, create congestion and potential accidents with pedestrians, and cause wear-and-tear on Moscow's roads? Idaho has a backlog of road maintenance needs as explained by Director Brian Ness to the Idaho legislature's Joint Finance-Appropriations Committee recently. To almost triple the amount of roads Idaho will need to maintain with both snow removal and repair for this particular stretch is not	information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. FHWA and ITD have presented alternatives that balance the needs of the public with protection of natural resources. The Preferred Alternative was not identified based interest of employees' relatives or insider manipulation. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative does not go over Paradise Ridge but would be located along its base. The proposed project would tie into the proposed Ring Road concept that is being proposed by the City of Moscow; however, there is no definite plan at this time. That project has an independent purpose and need and is outside of the scope of this project. The consistency with the Ring Road is being considered during the EIS development. See FEIS Section 4.2 Land Use and Recreation Effects. See General Response Weather-3 andWeather-4, and Weather-5 regarding elevation, ice, snow accumulation and fog. Geotechnical information will be collected and utilized during the design process to determine if blasting is necessary if an action alternative is selected. See General Response Maintenance-1 and Maintnenance-2 regarding maintenance of the existing US-95 loop. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See Safety-2 and Wildlife regarding wildlife collisions and wildlife habitat

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			fiscally responsible. Other more reasonable approaches would be to make the current route a 2-lane, 1-way stretch and build a new 2-lane, 1-way stretch flowing in the opposite direction on the western proposed route, or make the C3 route the preferred choice, as paving Paradise Ridge is unacceptable for numerous reasons well-articulated by others. In regards to E2, a primary concern is the number of car encounters that will happen with large wildlife, as numerous large animals utilize Paradise Ridge. Not only will the highway interrupt and displace their natural forage range, but these animals pose a serious danger for travelers not only in terms of potential direct impacts but also with drivers swerving to avoid hitting them. Since this will be a high-speed stretch of highway, reaction times are minimized and force of impacts is maximized. Couple that with potentially more fog, snow and/or icy roads that probably occur at higher elevations and you are creating a recipe for repeat disasters if the E2 route is built. Since the proposed reroute is intended to solve safety issues, how is building a new highway in an unsafe area not contradictory? Since Paradise Ridge is a lot steeper than the lower elevations, it seems a lot more work is going to be needed in order to make the terrain level enough to put in a wide, 4-lane highway. Since there is less soil and thus more exposed and shallower rock, that will require more blasting in order to break up the substrate. All that seems like it will be more costly than if the route chosen were less steep, such as	respectively. General Response Weather-2 addresses the sampling period for the weather analysis and how it relates to the longer 30+-year data set. See General Response Displacement-1 for clarification of the residential and business impacts. The majority of the businesses in the northern project limits would not be dependent on drive by traffic. See General Response Safety-3 regarding how existing US-95 was considered in the Revised Safety Analysis (ITD 2013). See General Response Safety-4 regarding making smaller repairs on the existing US-95 alignment.

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			where the central and western route could be. I am also concerned that ITD's preferred route is partly based on faulty or incomplete data. For example, the weather data was taken from one season which was a mild season compared to average snowfall and temperature for this area. Weather data should have been taken over several seasons in order to gain a better picture. How can ITD be sure that the E2 route experiences less severe weather than the other routes based on such limited data, especially when logic indicates that higher elevations are colder and thus icier, snowier and foggier? Also, from what I understand, the number of displaced businesses and homes on the C3 route has been over-estimated in the DEIS. I understand that there is only one home that will have to be removed, whereas the E2 route will displace more. How can people trust that ITD is making a wise decision if the data used to justify the preferred route is inaccurate? That misinformation should be evaluated and updated before a route is chosen. In regards to the businesses on the route, they all occur on the final, straight stretch into Moscow. It does not seem necessary to widen that part of the road since this is not being done to alleviate congestion. There really is not that much traffic that utilizes the highway. Keep that portion of the road as is and those businesses will not be impacted. Or put in a center lane or a 2-lane for one direction by widening that stretch of road to the west so as not n	

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			impact those businesses' property. On the other hand, if the highway is rerouted, that means less people are likely to utilize those businesses. Why impact them economically by building the highway somewhere else? I imagine the money saved by not widening that final stretch could be used to well-compensate the one homeowner that would lose their home to a C3 highway. Lastly, the current route will still be used and remain unsafe if a new 4-lane highway is built. How does ITD plan to solve the issue that instigated this whole process in the first place? Will the current route no longer be considered a highway and then become the county's responsibility? It has been reported in the Spokesman Review (http://www.spokesmanreview.com/news-story.asp?date=110802&ID=s1249416) that Bob Clyde, one of the landowners who will sell his marginal land to ITD if the E2 route is built, has a family member who worked for ITD to help craft the E2 route. While that charge may be false, just the perception that there is nepotism involved with the decision taints it. Add that to all the reasons not to build on Paradise Ridge plus the reasons to build elsewhere, and it looks like ITD is more interested in helping out special interests instead of the greater community that will forever be impacted by a bad decision. It is understandable why people look out for people they know. It is also only natural to not want to be told that an initial decision is bad and thus react by	

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			becoming stubborn in refusing to change. I urge you, though, to see this from a bigger perspective and through the eyes of those who question the decision. Issues like this should not be decided by a small group of people, especially if those people do not actually live in the area. It really does take a lot of people, particularly ones who live in the area, to add ideas into the process to insure that the best decision is made. That should be done because it is the right thing to do, not because a court orders it. There is no reason for ITD to create controversy by paving Paradise Ridge when better alternatives are available. While it is a good idea to not rush into any major decision like this, the highway probably would have already been built by now if ITD had chosen the more logical central or western route at the very beginning. If ITD chooses E2 again, there surely will be lawsuits and further stalling. It is only reasonable for ITD to take the "high-road", accept that the initial decision was based on incomplete data and choose one of the other routes. It seems better to modify the current route, solve the safety issues, save money and protect Paradise Ridge. Thank you for considering my comments and please do not choose E2. Sincerely, Garrett Clevenger 822 8th Street, Moscow, ID	
E-104	Hugh	Martin	Dear Sirs, It is time to reroute HWY 95 using the E2 route. Let's get it done and stop coming up with	General Response Schedule describes the next steps in the environmental process and the anticipated

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			DELAYS!!! I understand the money is now available so just move forward and get it started and done. Until, HUGH	schedule.
E-105	John	DeGroot	March 25, 2013 Idaho Transportation Department Headquarters Office of Communications P.O. Box 7129 Boise, ID 83707-1129 Fax (208)334-8563 comments@itd.idaho.gov Re: US 95 Thorn Creek to Moscow project Dear Madam/Sir: Thank you for the opportunity to comment regarding the US 95 Thorncreek to Moscow Project. I feel the IDT has done an exceptional job in collecting and compiling the data needed to make a well informed decision regarding realignment of Highway 95. In my opinion more than enough time and expense has been devoted to gathering enough information to make an informed decision. I have lived in Moscow since 1979 after graduating from college because I love the area and surrounding landscape. I can be grouped into the category that lives here by choice rather than by default. I work for the Nez Perce Tribe which is headquartered in Lapwai. I have been commuting to work since 1985 (23 years), so I have considerable experience regarding the stretch of highway of concern. My thoughts and observations regarding the alternatives are as follows. Safety is my primary concern. I believe E1 to be the	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Your comment states that E-1 is your preferred alternative. The E-1 Alternative was eliminated during the alternative screening process and the E-2 Alternative was forwarded for detailed analysis in the DEIS and is ITD and FHWA's Preferred Alternative as described in General Response Alternative. – All the action alternatives would have Expressway Access control as described in General Response Access. The information regarding the relationship between elevation and temperature as well as the cold air drainage and black ice relationships are consistent with the findings in the weather analysis. See General Response Weather-3 and Weather-4, regarding an explanation of elevation, ice, snow accumulation, and other weather related driving conditions.

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			safest route based on two factors, fewer access points and weather. Limiting the number of access points, and the visibility and configuration of the access points should be of primary concern as safety is no doubt directly affected. Regarding climate, my major concern is black ice. My observation is that black ice along this route is most frequently found in low lying areas before sunrise. Cold air drainages create the coldest temperatures in low pockets and ice forms when the dew condenses on the road. Black ice is not readily visible to the untrained eye, and many people are obviously unaware of this hazard based on the number of vehicles I have observed losing control and ending up in the ditch or the on-coming traffic. It would be interesting to analyze your weather data to see where and when the coldest temperatures occur. There is a general pre-conception that temperatures decrease as elevation is increased. This results in more snow accumulation at higher elevations. When people see snow they slow down, a natural reaction. People who don't see black ice lose control and crash. So I am not convinced the proposed eastern route is more dangerous in regards to local weather. There is an expectation of out of state drivers as well as most locals that since US 95 is a federal highway it should be designed to drive safely at highway speeds. The IDT should attempt to achieve the safety and efficiency standards of modern US highways. Out of state drivers have a tendency to believe these highways are comparable in terms of	

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			safety and travel time, and plan trips accordingly. Estimated trip times are based on speed limits, and it assumed that a person can travel safely at highway speeds on these roads. I commend the ITD in its attempt to construct the safest possible route. In my opinion one significant benefit to the eastern route is the view this route would provide. This vantage would provide more stimulation to those that treasure the beautiful Palouse, and allow travelers passing through a greater opportunity to observe the beauty that surrounds them. I personally would prefer the eastern route based on safety and the view, and I would guess that many non-local people driving the highway that did not have an opportunity to comment would also appreciate the better views. I eagerly await the construction and completion of the US 95 Thorncreek to Moscow Project. Safe Travels, – John DeGroot 716 S Lynn Street, Moscow, ID 83843	
E-106	Louise M.	Davison	Dear Mr. Rush, I have lived on the Thorncreek-to-Moscow section of Highway 95 for nearly twenty years, and have taken my life in my own hands so many times getting in and out of our driveway that I count myself lucky to still be alive to write this to you. Our home is no longer threatened since the proposed C3 route will go slightly east of us, according to the three remaining alternatives, but it does not lessen my support FOR ALTERNATIVE ROUTE E-2.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. See the General Responses for Weather for additional information regarding weather and road conditions. The E-2 Alternative is ITD's and FHWA's Preferred Alternative and would result in the greatest safety benefit. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See

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			I have watched the weather for these nineteen plus years. I have watched all the homes go up on Paradise Ridge. I am soundly of the opinion that these tiny parcels of Palouse Prairie have already been sufficiently endangered by private home ownership. Who polices these homeowners as stewards of this land? I am further convinced that a safe highway, one that includes serious mitigation for any environmental impacts, should go at the base of the Ridge in order to quickly design and build the shortest, safest, and least costly route. Most important of all to me, even if I were to lose my home, is that the highway be made safe. I am embarrassed to say that I was happy to see my children grow up and go away to school so they were not on the existing highway daily. Everyone in my family has either been involved in an accident on this stretch of highway or been so close to one that it feels like a matter of time before we are in one. The new highway cannot be completed soon enough. And E2 makes the most sense. Thank you for your attention. Louise M. Davison "Be who you are, want what you have, and do what you can." [Forest Church] Louise M. Davison 3697 Highway 95, Moscow, ID 83843 208-310-0962	General Response Safety-3. The mitigation has been updated in the FEIS Chapter 9. The effects of the project in conjunction with indirect and cumulative effects including past, present and reasonably foreseeable future commercial and residential development have been added to the FEIS Chapter 6, Indirect and Cumulative Effects. See General Response Weeds and Wildlife regarding effects to Palouse remnants and Paradise Ridge. –
E-107	Lucille A.	Scott	To whom it may concern: I am writing to encourage you to choose the C-3 option when re-aligning US 95 between Thorncreek Road and Moscow.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative

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			My reasons for preferring this route are personal. My spouse has been commuting to Lewiston for work for more than 23 years and I do not want him driving in winter at higher elevations than the road already reaches on Reisenauer Hill. The eastern option would travel at an even higher elevation for several miles, increasing the risk of accidents due to fog and icy road conditions. There appear to be legitimate concerns about disturbance of wildlife, both animals and plants, on Paradise Ridge if the E-2 option is built. However, my concern about this alignment option is once again personal. Living on a relatively busy thoroughfare on the eastern side of Moscow, I enjoy quiet at night once the local traffic dies down; noise from the highway traffic traveling though the downtown cannot be heard. However, I believe the noise of a four-lane highway will be heard in our part of town if the highway is brought over the ridge to the south. I will be able to see it from my neighborhood and, thus, will also be able to hear it. My quality of life, as well as that all Moscovites on the east side of town, will be diminished forever. Therefore, I request you choose the C-3 option for re-alignment of US 95, the one which will impact the least number of people in Moscow. Sincerely, Lucille A. Scott 505 N. Grant St., Moscow, ID 83843	describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, ice, snow, and fog. See General Response Safety-5 regarding Reisenauer Hill. General Response Weeds and Wildlife discusses the alternatives' indirect effects to vegetation and wildlife on Paradise Ridge. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. While the highway may be closer to your residence and could have increased visual and noise effects, these are not expected to exceed the FHWA Noise Abatement Criteria. The noise levels typically decrease by 3dBa for every doubling of distance. The visual and noise effects are discussed in 4.11 and 4.12 respectively.
E-108	Margrit	von Braun	March 25, 2013 Dear ITD Decision makers, I write to express my strong support for the E-2	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative

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			route. The ITD did a commendable and thorough job in the Draft EIS. This project needs to move forward. I summarize my review and comments of the Draft EIS. Safety issues for affected property owners: The current highway, along which I have lived for 25 years, is dangerous and must be replaced. The preferred alternative, route E2 is the safest and is estimated to reduce accident rates by 69%, the most of any alternative. That would have translated to four less deaths, 13 less severely debilitating crashes, and 150 less accidents over the past ten years. More of these tragic crashes are projected to occur in the future, as traffic volume increases. Most of those that oppose the E2 alternative live outside the study area, do not own property directly affected by the alternative routes, and are concerned about indirect effects on Paradise Ridge, much of which is on the periphery or outside the study area. No More Delay: This decision process has been going on for nearly 20 years. This is one of the most dangerous stretches of major highway in all of Idaho, and the most dangerous in our region, extending from Benewah County to Riggins. Too many people have died and suffered severe injuries while this delay has proceeded. Our friends and neighbors continue to use this road every day and our families are at unnecessary risk. There should be no further delays. The safest road possible should be built ASAP. Any extension of the review period or more litigation should be discouraged.	describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The environmental process requires that all substantive comments received during the comment period be addressed. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3. Additional information regarding the indirect and cumulative effects to Paradise Ridge, including existing and proposed private development has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. See General Response Weeds and Wildlife. ITD and FHWA have proposed mitigation measures to minimize indirect effects to Paradise Ridge. See FEIS Chapter 9, Environmental Commitments. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. See General Response Displacement-1 for a clarification of the impacted residences and businesses. All of the action alternatives would be Expressway Access Control as described in General Response Access. As a correction, the tree stand north of Eid Road was not determined to be eligible for the National Register of Historic Places. None of the alternatives would impact historic resources. In response to public and agency comments, the comment period was extended to March 25, 2013.

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			E2 is clearly the Safest Alternative: It is the straightest, flattest, shortest, least expensive route; with the fewest accesses, and least poor weather conditions. E2 is the only alternative that eliminates Reisenauer Hill, minimizes curves, has the minimum number of accesses and is most favorable for conversion to "no access" status for the next generation of highways. E2 is the Least Disruptive Alternative. Nearly all the land in the corridor is private property. The owners of more than 80% of the land directly impacted by the three alternatives have notified the ITD that they prefer alternative E2. E2 is less disruptive of local businesses; minimizes residential and business relocation, and the number of remaining homes and businesses that must access the highway directly; results in the least fragmentation of farming operations; best preserves, protects and services the current agricultural practices in the area; and is the least likely to encourage suburban encroachment into some of the best farmland in the northwest. The vast majority of farmers impacted by all three routes agrees that E2 is the best alternative and least interferes with their operations. Paradise Ridge is Private Property. Most of the opposition to Route E2 centers around potential impacts to wildlife, remnants and restoration of native prairie, and visual effects on Paradise Ridge. These alleged effects occur on private land at the base of the ridge on the periphery of the study area, or largely outside the study area on the ridge itself. All of this land is private property. Currently, the ridge is subject to	See General Response Safety-5 regarding Reisenauer Hill.

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			considerable pressure for residential development, is becoming less accessible to the public, and less hospitable to wildlife. As the ridge area continues to develop and is fragmented into suburban homes and lots, human interaction and habitat loss will be particularly significant with respect to big game and predator species, and predation and disturbances by suburban pets will more adversely affect these and other non-game populations than the proposed highway. This trend is likely to get worse in the future. Stewardship of Paradise Ridge. Most of the landowners on and adjacent to the ridge are responsible stewards and many generously have allowed public access to their property for generations, although no trespassing signs are becoming more prevalent. With respect to prairie restoration, significant portions of these efforts are being undertaken by landowners who support alternative E2. Many of these owners view alternative E2 as a restraint on ridge development and suburban encroachment from the west. They believe locating the highway at the base of the ridge may, in the long run, better preserve the current environment. However, it must be remembered that all of these efforts are voluntary. There are no guarantees that future owners and potential development will decide to ensure the perceived character of the ridge, sought by the opponents of this Alternative E2. Quarreling Views of the Ridge. With respect to visual effects, the perspective of those who look at the	

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			area differs 180 degrees from those of us who look from within the area. Those who view the ridge from the urban area of Moscow believe the highway at the base of the ridge will diminish their view. Landowners from the area believe the view from alternative E2 will enhance the view to the west and be an attractive gateway to Moscow. Environmental Mitigations Required and Proposed. The required and proposed mitigations to offset adverse environmental effects are nearly identical for all three routes as follows. C3 actually requires the most mitigation, including the only cultural heritage impacts. E2 has the largest wildlife impact associated with a stand of Civilian Conservation Corps (CCC) timber, planted in the 1930s, that may be habitat for three species of potential concern (bat, songbird and lizard). W4, incidentally, is the route that potentially most impacts the only endangered species found in the study area, and more CCC and earlier (1904) conservation tree plantings will be destroyed. Thank you for your continued consideration and diligence on these important issues. Sincerely, Margrit von Braun 1075 Snow Road, Moscow, Idaho USA 83843	
E-109	Mark E.	Wray	Dear Adam and all concerned, I am writing to add my opposition to the E-2 realignment. I have been a Moscow resident for 14 years and remember hearing about this discussion when we moved here. I have since had a chance to educate myself on the issue and am amazed that it is	See General Response Weather-3 and Weather-4, and Weather-5 regarding elevation, snow accumulation and other weather related conditions. The E-2 Alternative would not directly affect Paradise Ridge. Paradise Ridge is a group of privately owned parcels that have over 55 homes and businesses with

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			still being debated. I recently received the letter sent to you by the PRDC organization and would love to hear what rebuttal ITD has to it's stated facts. Of most concern to me is the added risks imposed by putting the highway at the higher elevation (E2 vs. C-3). As I write this it has been snowing off and on for the past 24 hours and driving up the ridge just last night I noticed that the snow accumulation was triple at about 2800 ft and higher than that down on the highway. It is a very common to have the weather change drastically in just 200-300 ft of elevation climb. I would think that with all that has been said and having heard the facts (costs, environmental impact, noise impact, weather concerns, opposition from multiple federal agencies, etc.) that the ITD would want what is best for the community and the environment. I am at a loss to understand why ITD is so persistentin sticking with an alignment that is opposed by so many for one that is just as safe and less intrusive. Remember that the impact of where you place this new stretch of highway is permanent and the changes you make are irreversible. Why then would you not want to preserve something so beautiful and important as Paradise Ridge and its surrounding environment. Thank you for taking my comments and concerns into consideration. Sincerely, Mark E. Wray Aviation Department Manager Schweitzer Engineering Laboratories, Inc.	roads and support facilities. The action alternatives would have Expressway Access Control as described in General Response Access. See General Response Weeds and Wildlife regarding Paradise Ridge.

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			509-338-9191 x 210 office 509-338-9393 fax 509-979-4907 cell	
E-110	Mark	Townsend	Route E-2 should no longer be considered a viable alternative because: 1) Impact on wildlife will exceed that of C-3. Idaho Fish and Games study recommendation reflects this as well. 2) The Palouse prairie remnants would be adversely affected by non-native species spread by vehicles and other vectors. Weed control in Idaho is generally ineffective. Knapweed is steadily encroaching on many areas of Latah County. Most landowners just don¹t care or give up quickly on control/eradication. 3) Standardized precipitation shows monitoring was during a drier than normal period. This makes the predictions much less reliable. During a normal or wet winter, road conditions would become more dangerous than the other routes. 4) By not following more closely to the existing highway, noise will be affecting a new group of residences that were developed without a highway presence. Missing information: 1) P135 and 137DEIS ¬ How many residences and businesses are within 300 ft. of the centerline in the no action option? 2) Estimated annual maintenance costs to Latah County for the old highway? 3) Future connectivity to a planned ring road or bypass of Moscow ¬ how would any of the	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The responses correspond to the numbering in your comment. 1) The E-2 Alternative would not impact any critical ungulate habitat but it would impact more moderate and marginal quality habitat for ungulates, primarily deer. See the DEIS and FEIS 4.8. See General Response Agency regarding the difference in opinions regarding ITD's and FHWA's Preferred Alternative. 2) See General Response Weeds and Wildlife regarding indirect effects to Palouse remnants and Paradise Ridge. 3) See General Response Weather-2 regarding how the referenced data set related to the larger 30-year data set. See General Responses Weather-3, Weather-4 and Weather-5 regarding weather conditions. 4) See the FEIS Section 4.12, Noise Effects for more information regarding noise. In response to your note on missing information: 1) See FEIS Section 4.1 for numbers of residences and businesses within 300 feet of the centerline for the No Action Alternative. 2) See General Response Maintenance-1 regarding maintenance for the existing US-95. 3) The Ring Road concept is discussed in the DEIS

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			alternatives fit with any of Moscow's future goals? 4) Zoning changes along any route? C-3 should be the route chosen because: 1) Even though C-3 would have the greatest number of approaches, this would be best for future commercial and residential development. 2) Because access would be similar to the existing route, C-3 would have the least indirect effect on the economy of the area. 3) It would consolidate impacts into a single corridor, hence minimize the ecological footprint. Even though safety and shortness are said to be the most important, the slight statistical advantages of E-2 are not worth the costs numbered above. In my opinion, the C-3 option is the best option other than no action. C-3 best fulfills the purpose and needs of all the options under consideration. Sincerely, Mark Townsend 214 N. Grant St., Moscow, ID 83843	Sections ES 9, 3.2.3, and 4.2. Based on discussions with City staff as part of the Community Impact Assessment update (2011), a final detailed Ring Road alignment had not been identified and funding had not been allocated or secured to finance the project. A Ring Road project would be an independent project that has a separate purpose and need, and is not dependent on the identified improvements for the US 95 Thorncreek Road to Moscow project. Additional evaluation, a clear future funding source, and regional plan acceptance and adoption would be required to initiate additional infrastructure as part of this project. 4) There will be no zoning changes along any of alternative's routes. The Ring Road project is discussed in the DEIS Sections ES 9, 3.2.3, and 4.2 and clarified in the respective sections of the FEIS. The Safety Analysis uses the Highway Safety Manual to predict accidents on each alternative. See General Response Safety-7. Wild animal crashes and weather related accidents were included in the analysis of each alternative. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. General Responses Weather-3, Weather-4 and Weather-5 discuss the relative differences in elevation, temperature, ice, snow and fog between alternatives. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General

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				Response Safety-3. See General Response Safety-6 regarding the significance of the difference in safety between alternatives. See General Responses Safety-3 and Safety-6.
E-111	Mary	DuPree	Greetings: I have participated in presentations and hearings regarding the improvements to US 95 south of Moscow since the earliest public hearings, including that on January 21, 2013 in Moscow. I have read the booklet you sent me, and have studied the video, so I consider myself well informed. I strongly oppose the E-2 option for these reasons: It is not the safest route. The winter weather conditions tend to be more severe high on the shoulder of Paradise Ridge There will be more potentially dangerous interactions between the wild animals that live on the Ridge and vehicles on this route. The existing route will continue to be used by local traffic and will continue to be dangerous. It intrudes into an area immediately adjacent to Moscow which is both culturally and environmentally important to its citizens. It "plows new land" unnecessarily, destroying both natural areas and farmland. it does not displace significantly more businesses or residences Latah County will have to assume the additional responsibility of maintaining "Old 95" I support alternative C-3, which builds on the existing corridor, will be safer, more fiscally responsible, and more conservative of our precious environmental and agricultural assets.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). The E-2 Alternative would still have the greatest safety benefit. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analysis. See General Response Weather-3, Weather-4, and Weather-5 regarding elevation and weather related road conditions. General Response Maintenance-1 addresses maintenance of the existing US-95 loop. See General Responses Weeds and Wildlife regarding Palouse remnants and Paradise Ridge. See General Response Displacement-1 for a clarification on residential and business impacts.

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			Mary DuPree 320 N. Adams St., Moscow, Idaho 83843	
E-112	Nancy L.	Carter	ITD: I wrote and emailed a previous letter denoting Route E2 as my preference of routes. Below are additional comments concerning that choice. I think time is of the essence on this project, as more accidents with injuries and deaths are occurring on this dangerous stretch of highway. I believe any adverse effects to the environment E2 may cause can be effectively mitigated, and any required relocations should be replaced with "like" property. I would like to see environmental mitigation projects done by local contractors. Nancy L. Carter 2836 Hwy 95 S, Moscow, ID 83843	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Mitigations are described in the FEIS Chapter 9, Environmental Commitments. If your property is impacted ITD will work with you during the right-of-way process and in compliance with the Uniform Relocation Act. See the FEIS Appendix 5.
E-113	Neil	Marzolf	Hello, I have just a few comments. The safest route is E2. This is the route I think the state should take. I support the ITD and am looking forward to you all making the right decision and taking the E2 route. It is time we get started. I live at the bottom of the wicked hill 'riessenhour" and I know first-hand the hazard of this road. Tired of picking cars out of my yard. Here we have 4 businesses located. 1) A brewery opening in just 2 months from now. 2) Our goat farm "A&M Farms" 3) Our construction company IHS 4) A 11 space RV park 5) This spring we are planting our "Hop" orchard.	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. See General Response Schedule regarding the environmental process and the anticipated schedule. The environmental process must consider all substantive comments from the general public. Thank you for the information regarding your businesses. While we do have record of your home falling within the footprint of the conceptual level alignments we were not aware of your businesses. The information regarding the potential impacts to your businesses has been recorded. Farms would be treated as part of the rural residence. If your property is

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			If the route of E2 is not selected then this would displace 3 businesses at this very location as well as we would lose out 5 bedroom 3 bath house. Our family would be looking for a place to live. If I felt that the other routes were safest and best I would not be building on my property here rather, we would be looking for another home. E2 is the best, safest and the route that should be chosen. So let's choose it and get on with it. You have my full support. Keep up the good work IDT and now let's make the right decision and make this road safe even for those ignorant Paradise Ridge earth-worm lovers because even they, deserve a safe road despite their ridiculous fight. Neil Marzolf 509-304-4719	impacted ITD will work with you during the right-of-way process and in compliance with the Uniform Relocation Act. See the FEIS Appendix 5. –
E-114	Patrick Nez Perce Tribe	Baird	Mr. Rush, Thank you for the opportunity to comment on the Draft Environmental Impact Statement prepared for the US-95 Thorncreek Road to Moscow project. I am concerned that the Eastern Washington University archaeological study reports discuss their assumption that the project area has a low potential for archaeological Native American village sites in the project area, and thereby seem to dismiss the potential for any significant tribal resources or sites. Indeed, the archaeological surveys only turned up 1 historic trash scatter and many historic farms, buildings, and structures, and no prehistoric or tribal cultural resources. I am really concerned about whether or not ITD put	FHWA and ITD appreciate the Nez Perce Tribe's (Tribe) interest in the US-95 Thorncreek Road to Moscow Draft Environmental Impact Statement (DEIS). We look forward to addressing your concerns regarding the project's effects to important Tribal resources and sites. Due to the large size of the project area, it was necessary to utilize some degree of predictive methodology to help identify areas with the highest likelihood of having cultural resources. A report titled A Cultural Resources Probability Study for Idaho Transportation Department's Proposed US 95 Thorn Creek Road to Moscow, Stage 1 Project, Latah County, Idaho (Sharley and Gough, 2005) focused on the likelihood of encountering prehistoric Native American resources in the 30 sq. km (12 sq. mi) project area. This

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			forth a good faith effort to identify non-archaeological tribal resources, specifically historic properties of cultural and religious significance to Indian Tribes. Examples that might be located within the project area include traditional plants, significant landscape features, and ritual sites. By limiting the cultural resource review to archaeologists and historic architects, the agency may not have been able to identify these sites types, and therefore is unable to consider the impacts of the undertaking upon them in the decision making process, in violation of the National Historic Preservation Act. Please contact the Nez Perce Cultural Resource Program to determine how we can identify these important resources before the final decision is made by the ITD. Sincerely, Patrick Baird Tribal Historic Preservation Officer\ Archaeologist Cultural Resource Program Nez Perce Tribe PO Box 365 Lapwai, ID 83540 208-621-3851 (o) 208-791-8610 (c)	report was not circulated with the DEIS but was available on-line during the DEIS development, was referenced in subsequent reports, and was provided to your office. It cited ethnographic/historic information regarding Native Americans including information regarding camas root grounds, hunting areas, travel routes, known and predicted camp locations, and the relationships of camps to landscape features such as Palouse highlands, camas meadows and stream valleys. The report suggested that there may be a low to moderate probability of encountering prehistoric sites in the project area, including villages, and that there were other nearby sites with a higher likelihood of having prehistoric cultural resources. The study also stated that over 50 percent of the project area has been surveyed in the past and nothing has been found to date. This information helped to identify where sites were most likely to be located and where further investigation should be focused, including shovel testing, but it was not meant to dismiss the possibility of significant tribal resources or sites in the project area. Some of the same ethnographic citations were used in subsequent cultural resource surveys for the project. Four additional cultural resource surveys that involved literature reviews and field studies, including shovel testing were completed. See the DEIS and FEIS Section 3.4.2 Methodology. FHWA and ITD also consulted with the Tribe to help identify any Tribal concerns and Traditional Cultural Properties. Prior to initiating the cultural resource studies, FHWA and ITD sent a letter to the Nez Perce Tribe (July 14, 2004) initiating Tribal Consultation under

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				Section 106 of the National Historic Preservation Act. The letter described the project, stated that an EIS will be prepared, and requested the Tribe to provide information on cultural resources that should be considered as part of the cultural resource studies. FHWA also requested any information regarding Traditional Cultural Properties and sacred sites. The ITD District Engineer and the Nez Perce Tribal Executive Committee also engaged in government-to-government consultation and discuss projects through their quarterly meetings as agreed upon in their Memorandum of Understanding (MOU). There have been at least 18 quarterly meetings Since December 2004 during which the project was discussed. Through the tribal consultation letter, the review opportunities for the various cultural resource studies, and the quarterly government-to-government consultation meetings, ITD has made a good faith effort to identify Tribal concerns and to identify and consider effects to cultural resources. ITD will continue to consult with the Tribe through the Nez Perce Tribal Executive Committee as agreed upon through the MOU. We respectfully request that the Tribe work through this committee to provide information about any Traditional Cultural Properties, sacred sites or other important cultural resources that could be affected by the project so that we may take steps to avoid or minimize harm to them. ITD will hold the information in the strictest confidence and will refrain from publishing the information in the Final EIS and any other public documents.

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E-115	Rami	Attebury	Dear Mr. Rush, As a homeowner potentially affected by the Highway 95 Thorn Creek project, I am writing to lend my support to ITD's preferred route, E2. My primary reason for doing so is safety, and I believe that ITD has chosen the correct route to reduce the accident rate in this section of the state. After five years of residence at the bottom of Reisenauer Hill, I have seen numerous vehicles in the ditch, my pasture and my yard. One of the most recent accidents resulted in the death of a truck driver attempting to chain his tires on the side of the road. My husband, having heard the truck miss a gear and realizing the driver would likely need to put on chains to summit the hill, went out to see if he could help. He was the last person to ever speak to this accident victim. My husband warned him about how often vehicles lose control on the hill in icy conditions and suggested that he wait for law enforcement to slow traffic so he could chain safely. Unfortunately, this did not occur. I would like to express my wish that a decision to proceed with E2 be made as quickly as possible to prevent similar situations in the future. In addition to safety, I would like to lend my support to E2 as the owner of a residence in which I live with my husband and four young children. Both C3 and W4 require the seizure and destruction of our home and property. My family does not wish to see our home destroyed. When we moved in, the house was a three bedroom, one bath house. Improvements made by my husband and myself have turned this into a four bedroom, three full-bath home with an	Thank you for your comments and for sharing your experience regarding the accident. ITD is committed to improving this roadway as soon as possible. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The DEIS alternatives are based on a conceptual level designs. Right-of-way needs will be determined during the design process when geotechnical, topographic and detailed survey data is available and when a design details are known. ITD will work with landowners one on one during the right-of-way and design process. Should your property be impacted, you would be compensated according to the Uniform Relocation Act. See Appendix 5, Summary of Uniform Relocation Act.

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			additional basement bedroom/office. The significance of this change is that it accommodates my large family in a location close to my workplace in Moscow. Additional improvements around the property have resulted in two guest cabins, an out-building with a private bar and brewery, new siding on several barns, fencing for goats, and a band equipment room. I believe it will be hard to find another residence of this nature within a five minute drive of town; hence, even if we were to be compensated monetarily for lost property, it is unlikely that such compensation would equal the true value of the home and property in terms of location, square footage, number of room, outbuildings, pasture, and convenience. I would like to thank the Idaho Transportation Department for the opportunity to comment on this issue. I hope that a decision is made quickly so as to both prevent future needless accidents and to avoid destroying permanent dwelling places of Idaho taxpayers. Sincerely, Rami Attebury, 3455 Highway 95, Moscow, ID 83843 509-607-1196	
E-116	Romney	Boehm	To the Idaho Transportation Department, This is in regards to the proposed expansion of U.S. 95 south of Moscow, ID, and the three possible routes. Given what I have been learning, I think that C-3 is probably the best route, for various reasons. For one, it is the established route and with improvements to the road, the safety can be greatly	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. While the C-3 Alternative follows existing US-95 more closely than the other action alternatives, it is new alignment east of existing US-95 from approximately MP 340-343.

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			improved. Secondly, I have heard that it will not cause the destruction of as many homes and business as the DEIS claimed it would. I agree with avoiding destroying people's property for the highway expansion, as best as is possible. Thirdly, I think that widening and improving the C-3 route would allow the preservation of more of Paradise Ridge and of the Palouse Prairie ecosystems, which are local treasures that I would think the whole state of Idaho should be proud to protect, preserve, and maintain for future generations. Many participants in the DEIS offer significant projections and data that indicate that E-2 would be an unwise choice, environmentally. Weeds are likely to encroach areas that are now covered in native plants and habitats. Deer, moose, and elk populations will be disturbed by E-2. These large animals also endanger drivers when they are in the middle of the road. Residents living close to the proposed E-2 route speak of very large deer populations that favor that area. If there is a route that wouldn't cut into Moscow's and Idaho's natural heritage in such a way, why wouldn't we be thankful and chose the other route (C-3)? The EPA, Idaho Fish and Game, and U.S. Fish and Wildlife Service all advise against the E-2 route. Finally, I think you should be very careful about claiming that E-2 would be the safest route. The weather study in the DEIS was done during a part of a year where the weather was not what local residents would call "normal" for the region. For example, I think there was little or no snow during	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. See General Response Safety-6 regarding the significance of the differences in safety between the E-2 and C-3 Alternatives. See Displacement-1 for a clarification of the impacts to residents and businesses. All of the action alternatives would be widened to 4 lanes as described in the DEIS 2.4.2. Widening the existing alignment would not be a comprehensive solution to the existing roadway deficiencies as described in General Response Safety-4. See General Response Weeds and Wildlife regarding the indirect effects of the project to Palouse remnants and wildlife. See General Response Safety-2 regarding how wildlife collisions were factored into the safety analysis. See General Response Agency regarding the difference in opinion regarding ITD's and FHWA's Preferred Alternative. See General Responses Weather-2, Weather-3 and Weather-4 regarding the data set used in the weather analysis, elevation, and weather related driving conditions. This information is reflected in the Revised Weather Analysis.

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			that time, which is very uncommon for our winter months. So, the study did not note all the low hanging clouds, fog, and precipitation that are common in the Paradise Ridge area. It also did not look at weather conditions during the whole year--weather conditions need to also be checked during the months of November and December as people living in that area say there is heavy fog among other weather conditions during those times. I think another study needs to be done so you can really know what you are proposing and so you can take full responsibility for how the weather on the E-2 route would affect its safety. You could start by asking a representative group of local residents what they observe. Some people might not see it as a problem, but that doesn't seem to be enough research to build a highway on. Everyone's safety is at issue, so a thorough study would seem best, all around. I hope you will really consider this under-examined aspect of the E-2 route, before you make a decision, because I know you will not want more blame from local residents for another unsafe road. Thank you for considering my input, Romney Boehm 732 South Logan St., Moscow, ID 83843	
E-117	Brent	Knapp	Dear Sir, A few weeks ago in Moscow there was a public event at which information was put out about the US Highway 95 realignment. I arrived in time to listen to some of the testimony. I also went through all of the exhibits and asked questions. Since I have lived in Moscow since 2007, I think this issue affects	See General Response Weeds regarding effects to Paradise Ridge and native vegetation. Chapter 6 discusses potential indirect effects to Paradise Ridge.

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			me so I should comment. My comment is simply this. The preferred alternative is too close to paradise ridge and will have an adverse impact on the native plants found there, which I have personally observed during an outing last year of the Idaho Native Plant Society. At least one major property owner on Paradise Ridge is very active in native plants issues and can be counted on try to keep Paradise ridge's native plants in a native Palouse Prairie state. It is everyone's duty to do everything possible to support that noble quest. Highway construction on Paradise Ridge would be in violation of that ethical duty. The new highway should be constructed as far from Paradise Ridge as possible, so I favor the most westerly of the three proposed routes. Please construct the new highway far from Paradise Ridge. I have signed my comments (enclosed). Sincerely,Brent Knapp 1404 Ridge Rd #9, Moscow, ID 83843	
E-118	Stephen D	Redinger	ATTN. Adam Rush I was raised on Jacksha Rd and our family still owns property there where my brothers, nieces and nephews hunt on a regular basis, and have been since the early sixties. Some facts I disagree with the Department of fish and game on. 1. There is very little water available on the south side of Paradise Ridge in the summer so most of the larger wildlife moves to Bald Butte in Washington where the north side of the butte has lots of water. 2. Also, the feed on Bald Butte is better with 11 old homestead orchards producing lots of different	Thank you for sharing your observations regarding wildlife and wildlife habitat on Paradise Ridge. Additional information regarding past, present and reasonably foreseeable future development and the associated effects on Paradise Ridge has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. The Expressway Access Control may minimize development pressures; however, development is regulated by the local planning departments for the City of Moscow and Latah County. See General Response Access. See General Response Safety-2 regarding wildlife collisions.

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			types of forage. 3. No Matter where you locate the road the same amount of wildlife crossings will have to be dealt with from the top of Reisenauer Hill to Zietler Rd. Also the accidents continue to mount on the old highway with another fatality and other fender benders. I strongly support E2 as the preferred route for highway 95. I know you cannot please everyone and there will always be the not in my backyard situation. If the situation continues the way it is going, the ones trying to save Paradise Ridge will be loosing as more and more houses are placed on the ridge. Maybe some mitigation to prevent further housing development on the ridge would be in order. Steve Stephen D Redinger 702 N Meyer Rd, Colton WA 99113 Phone 509 595 3871 Email sdredinger@gmail.com	See FEIS Chapter 9, Environmental Commitments for mitigation measures that will accommodate wildlife movement.
E-119	Susan	Westervelt	To Whom It Concerns: The last section of proposed improvements to Highway 95 south of Moscow has been under discussion for so many years, more people have died, and it just needs to get done. It seems logical to me that the best plan is to improve the existing section of highway just as the rest of the highway was improved to the top of the Lewiston Hill. I do not understand why the highway department is so determined to make the road longer, put it up on the side of the ridge where weather is more severe,	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The E-2 Alternative would be located along the base of Paradise Ridge and would be shorter than the existing section of US-95 because the curves would be eliminated. General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95. The E-2 Alternative would still have the greatest safety benefit.

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			wildlife will be impacted, and it will cause total disruption to what is left of one of the only remaining remnant Palouse Prairie vegetation sites in our region. C-3, the middle route utilizing the original highway is shorter, rights of way are already in place, it is one short section that can be straightened and widened in a much more timely and economically reasonable manner, and makes more sense in so many ways. If you punch in a totally new road, people will continue to use the old highway, which will be no safer than it is today and people will continue to die on the corner that is marked 60 mph when it should have been reduced to 50 mph years ago. I hope the Idaho Highway Department will choose C3 for the safety of Idaho and our visitors and for expediency and economic reasons. Why ruin a perfectly beautiful ridge when there is no practical, economic, or logical reason? Sincerely, Susan Westervelt PO Box 223, Deary, ID 83823	See General Response Safety-2 regarding how wildlife collisions are considered in the Safety Analyses. General Responses Weather-3, Weather-4 and Weather-5 discuss the relative differences in elevation, temperature, ice, snow and fog between alternatives. The E-2 Alternative would be directly affect Paradise Ridge but would be closer than the other alternatives. This could result in increased weed dispersal, which would be mitigated through limiting new accesses and implementing weed control policies. See General Response Weeds and Wildlife. While the C-3 Alternative follows existing US-95 more closely than the other alternatives, it is new alignment east of existing US-95 from approximately MP 340-343. Lowering speed limits is addressed in General Response Safety-4.
E-120	Suvia	Judd	ITD project comments division: If the goal of the realignment of Highway 95 in the section from Moscow south to Thorncreek is to improve safety, I do not think that E2, the route over the shoulder of Paradise Ridge, makes any sense. I used to drive school bus up Eid Road, and remember very well driving through the cold fogs that habitually blow in from the west and stick to the upper SW slope of the ridge. Not only is the visibility lousy, but at that point the road conditions undergo	The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3. See General Response Weather-3 regarding elevation and Weather-4 and Weather-5 regarding elevation, ice, precipitation, fog and wind. The E-2 Alternative would not tear out any Palouse remnants, nor would require any right-of-way that has Palouse remnants; however the footprint would be closer to Paradise Ridge compared to the other alternatives which could result in weed dispersal. See

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			a transition, eg. from wet to icy. I quite see the need for road improvements on the stretch of 95 in question; it is crowded with cars nowadays, and people drive its curves recklessly. However, I cannot see that the overall safety will be improved by putting the road up into the frozen fog belt, no matter how straight it is. I think it is a different kind of bad idea to tear out a chunk of native Palouse Prairie and risk impacting the nearby piece of it, when there are other alternatives. We have less than 1% of our native Prairie ecosystem left, and once it's gone it's gone. I am worried, but know that I cannot do anything about it, that the choice of the E2 route is motivated partly by considerations of who lives along other proposed routes, and whom they know in Boise. That thought, true or not, makes me uneasy. Please use your heads and have a change of heart. Suvia Judd P.O. Box 8665, Moscow, ID 83843	General Response Weeds. Mitigation measures are discussed in Chapter 9, Environmental Commitments. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. FHWA and ITD are not aware of outside influences in the decision making process.
E-121	Thomas	Besser	To whom it may concern: As a resident of Moscow and a regular driver of the Moscow-Lewiston corridor, I'd like to first compliment the ITD on those segments of the Hwy 95 realignment that have been completed, which represent a vast improvement of this section of the highway over the old road. I'd also like to thank the ITD for taking the time to prepare the DEIS and to make that document and all the other information publicly available for comment regarding the Thorn Creek to Moscow project alignment. Of the three alternatives remaining on the table at	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, fog and other weather related driving conditions. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill.

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			this point in time, I believe that all will result in a significant improvement of the safety of this dangerous segment of the highway, compared to the current route as all three separate the traffic onto separate northbound and southbound roads, and even W4, which otherwise follows the current route quite closely, eliminates the curve at the bottom of Reisenauer Hill which has been the site of so many accidents. After this great improvement in safety that will accompany any of these routes, it is my opinion that other factors should be the primary considerations in selecting the preferred new routing. For me, the C3 route is the best way to go. It provides a very good compromise between minimizing the number of miles of new route, eliminating the most dangerous part of the old route, and providing a direct route into Moscow from the south. I am most opposed to the E2 route, for both safety and environmental protection reasons. Regarding safety, I have lived in this area long enough to see the many days when Paradise Ridge is crowned by fog, extending well down to the E2 route, when lower elevation routes remain beneath the cloud/fog level. I believe that this will greatly adversely affect wintertime driving safety on this route, more than is suggested by the ITD commentary. I am a member of the Idaho Native Plant Society and the Palouse Prairie Foundation, and am well aware 1) that the Palouse Prairie ecosystem is nearly	See General Response Weeds regarding indirect effects to Paradise Ridge and Palouse remnants. See General Response Agency regarding the differences in opinions regarding ITD and FWHA's Preferred Alternative.

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			extirpated, 2) that some of the best remaining Palouse Prairie remnants are located just above the E2 route on Paradise Ridge, and 3) that among the factors threatening Palouse Prairie survival are invasive weeds and that highway routes have a dramatic effect in introducing and spreading those weeds. It is my understanding that other agencies, including the US Fish and Wildlife Service, the US Environmental Protection Agency, and the Idaho Department of Fish and Game also have all opposed E2, for these and additional reasons. I would urge ITD to take those opinions to heart and avoid the E2 option. Sincerely, Thomas Besser 3443 Foothill Road, Moscow ID 83843	

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Open-Microphone Testimony from Public Hearing on January 23, 2013				
OM-1	Jim	MacDonald	Jim MacDonald, M-a-c-D-o-n-a-l-d, four minutes, so I'll mostly read this fairly quickly. I thought I had more time. Even though I've lived on Paradise Ridge Road for 35 years, I didn't get involved last time because I just assumed that something so inane could have no real support. You know, who is really supporting this? After all, the Moscow community has two major landmarks: Moscow Mountain and Paradise Ridge. Exactly who would have any interest in defacing either? Would you build a road over Moscow Mountain strip mine it? Would you, and there are interests that, that uh probably would clear-cut it if the laws didn't prevent that. Huh, aren't there? Are there? Yeah. But for the environmental laws, there are interests that would. Allright. Then, since I retired a few years ago, I started hearing rumors that what seemed ridiculous was in fact a done deal. The power company guys, ITD surveyors, a former state legislator, these rumors, a done deal? Well, that was my basic reaction. How could this be a done deal? What processes had been gone through? What could possibly explain persisting with the self-evident stupidity? Again, who? Who? Who's responsible for this? And what process could have resulted in the alleged rumored done deal? No process? Do these interests assume they're so powerful they	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. FHWA and ITD are responsible for NEPA compliance and would not circumvent the process. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would be located at the base of Paradise Ridge but would not go over it. Paradise Ridge is privately owned land and does offer important scenic and ecological functions. See General Response Weeds and Wildlife regarding effects to Paradise Ridge and mitigation measures. ITD and FHWA are the lead agencies for this project and consider all public and agency input regarding

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			don't need process? Um, months later many of us got in the mail the slick PR package, you know, slick, corporate-looking. Again, whose money? Are tax dollars paying to deface the, the ridge? Who money, whose money paid for these slick materials? Then you show up today, is this taxpayer stuff? Is this somebody else, really, uh, behind this? Um, most strangely of all, the supposedly neutral, supposedly neutral, state agency, the ITD, recommends the ridge-ruining route without providing any convincing rationales and not even seeming to try very hard if you really look at the materials carefully, a sense of hubris or, uh, conceit. Again, circumstantial evidence of this done deal, uh, mentality. Then a couple of well-connected locals with public, uh, write public letters blaming another local citizen for the ITD's failure to do anything about the area five miles south of town. If the idea is somehow the grotesque charge that blood is on someone's hands, those hands are those of the ITD and whoever it might be in cohorts where, uh, with. Uh, Al Poplawsky is not a safety officer. Al Poplawsky can't get out in the road and put rumble sticks. He can't put danger signs, warning signs. He can't lower the speed limits or do any of that. Why don't they do that for 10 years? Is the ideals, is the idea some sort of blackmail? Our way or the highway? No safety for 10 years unless you, uh, bring a interstate-like highway to the very, uh, city limits. Uh, what is	the project and alternatives. Providing the "Guide to the DEIS" to the public was an effort to summarize information in the EIS, to notify the public of an opportunity to comment on the DEIS and to attend the public hearing. The release of the DEIS and timing of the hearing was during winter because it was approved for publication at that time and because there is a public interest to move forward with the project. It is not untypical to approve and have public comment periods during the winter or at any other time of the year. To accommodate the timing of the comment period, additional days were added. The comment period was then further extended to March 25, 2013 for an additional 30 days at the request of the public and agencies. The development of the EIS is funded by FHWA and ITD with tax dollars and we are not aware of any money trail or industry funding. We do not agree with the blame Mr. Poplawski has received in the comments or editorial letters. We also do not agree with the conspiracy or syndicate, industry influence comments received. FHWA and ITD are not catering to any special industries. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Please see the description of the EIS process and the screening of alternatives in Chapter 2, Alternatives. The project is being designed to AASHTO standards, which will result in a safety benefit. See General Response Safety-3.

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			going, uh, on, uh, here? Uh, again, uh, do either of these blame-it-on-Al-letter-writers have any connection to any of the likely ITD cohorts? Feeling that I might be getting closer to some, any explanation, uh, for this, I went to the informational meeting last Saturday where someone mentioned that last time around the lumber company had openly lobbied for a faster way out of town. Literally, a straight line or the closest thing to a straight line. Think of a slurry line. Any of you involved in the mining industry might know what a slurry line is. What these folks want to do in effect is set up a slurry line to run their chips and chip trucks up the ridge faster and more efficiently. A few cents' cost saving per chip load truck. Bingo, finally I started to get an, uh, an answer to who, who could possibly be, uh, behind this. Then I asked someone in Boise about the reputation of the ITD. Another bingo. Follow the money. Excuse me, I'm going to continue here. I haven't got much longer. Follow the money was the Boise political observer's advice. The ITD turns out to be a hand maiden for industry, the very companies that it is designed to regulate call its shots. That was the word from Boise. I now suspect that a syndicate in effect of the ITD itself and logger/trucker/mill interests have cynically used the EIS process with no public purpose in mind. If you believe safety, I've got a bridge to sell you. The circumstantial evidence is	Mr. Wasdens staff along with FHWA attorneys will have an opportunity review and advise the ITD prior to the release of the FEIS. The administrative costs of legal challenges are not factored into the total project costs presented in the DEIS. Each of the alternatives, including the No Action would have the potential for legal challenge and it is not possible to predict these actions. See General Response Weather-2 and Weather-3 regarding the methodology of the Weather Analysis and weather in relation to elevation.

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			there. For example, uh, after all these years, why wait until the dead of winter to release the DEIS? It reminds me of the White House policy of releasing bad news on Friday afternoons. Uh, and even more damning are the DEIS and supporting PR materials themselves. They're an intellectual hoax. On their own terms, these items don't remotely support the industry-friendly recommendation, and what they leave out, the truth, is scandalous. They contain numerous factual misstatements and misrepresentations that you hear a lot about or be able to read a lot about later. Not to bring myself in, and I'm almost through here, but I was a corporate securities lawyer years ago. A primary job was drafting and filing disclosure documents, uh, on behalf of corporations with the Securities and Exchange Commission in Washington, D.C. A basic rule with public documents is that it's every bit as wrongful to not disclose material information as it is to just straightforward lie. The idea is full and fair disclosure, transparency. Well, the DEIS is not yet an official public document, not yet. If filed in this present form, it would naturally be subjected to both federal and state legal challenges. If you doubt my, uh, credentials on this sort of stuff, uh, look me up. The federal, uh, EIS implications are obvious. I would talk to my old student Larry Wasden, my old student, uh, about state charges here. I, uh, again suspect that this is all part of an essentially	

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			quasi criminal fraudulent conspiracy, the slurry line, uh, idea. That's what's really behind this. All right, this leads to yet another material, uh, misrepresentation in the DEIS itself. When comparing total expenses, legal and administrative expenses are ignored. Again, why this obvious deception by omission? Who's responsible for that? These are public documents, folks, not the private property of industry. Why is this self-evident difference in ultimate expenses ignored? Why is this not a cost factor? Uh, could it be that ITD would spend our public dollars on lawyering to save the industrial complex a few cents per load? Finally, what is key for everyone involved is to keep in mind the ITD's apparent acceptance of the straight line engineering trucking efficiency argument. You'll see the weather stuff is just a crock. What's the idea, go up for safety? Audience member: It's not a crock. Testifier: Yeah, go up for safety? You'll have your chance. Go up for safety? Does that make sense to anybody? I have lived on Paradise Ridge, you'll have your chance, for 35 years. The idea that going up for safety, uh, is just [comment inaudible] Hearing officer: Your four minutes is up. Testifier: This is talking truth to power. There are powerful interests here. They have no interest in sharing the truth. Thank you.	
OM-2	Jack	Flack	Okay, I'm, I'm Jack Flack. I live south of Moscow. I came to the University of Idaho in 1956, went	FHWA and ITD must balance both the human and natural environmental impacts with the safety

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	Snow Farms Inc./Friends of Highway 95		there and got a degree in civil engineering and got a job offer from, uh, the Snow family and married one of their daughters and I've been in the area ever since, so I've been out there for about 54 years, and my picture windows on my house look right out to Paradise Ridge. I grow a big garden every year, and I'll address the first issue. Uh, those of you who garden know that if you don't want your tomatoes frosted and you don't want your cucumbers frosted, go higher. It doesn't frost on Paradise Ridge when it frosts on the western route. The western route is the coldest route. The cold air goes down in the flat and draws. The uh, some of the farmland that is the most valuable farmland is the farmland that lays west of, uh, Paradise Ridge. There's a huge block of some of the finest farmland in Whitman County and Latah County that lays in there that's very valuable. It probably produces more per acre than any other farmland in the world, and it's very valuable. Uh, I don't think we want to have a highway on it, and I would prefer not to have one there. Our main concern is that we get a highway built soon, that we get the safest highway that we could possibly have and that the alignment would be fairly consistent in elevation and it would be fairly straight and that's unlike what we have now, and, uh, uh, we've watched a lot of people be killed since this process started and we would like to have this road, this	benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See the response for V-9 regarding items repeated from your previous comment. Your observations regarding frost and fog are consistent with the Weather Analyses. The E-2 Alternative would have the greatest safety benefit, as stated in General Response Safety-3. See General Response Weather-3 and Weather-4, and Weather-5 regarding elevation, fog, snowdrift and frost. See General Response Weather-2 regarding the five-month data set and how it relates to the larger 30+-year data set. See General Response Schedule regarding the implementation timeframe. See General Response Wildlife regarding wildlife on Paradise Ridge and in the project area. See General Response Displacement-1 for clarification of the residential and business impacts. Thank you for clarifying that US-95's Reisenauer grade already goes over a portion of Paradise Ridge. Additional information regarding boundary of Paradise Ridge has been added to the FEIS Section 3.8 and 4.8. Information regarding indirect and cumulative effects to Paradise Ridge has been added to Chapter 6, Indirect and Cumulative Effects. See General Response Weeds for information regarding alternative effects to Palouse remnants. See Chapter 9, Environmental Commitments for additional mitigation measures.

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			environmental impact, uh, plan completed, the hearings held, approved and the road work started to get us a new, a new road put in. Uh, there are some safety factors that are involved. I don't think there's any question that the E-2 route is the safest route. It involves the least number of land. [Inaudible] will be the least destructive to the traffic flow while they're building it. You'll be able to build a highway and when you get through with it, you can connect it at both ends and there will be free-flowing traffic. You will not, your traffic going south to Lewiston will be not interrupted in any way until they start connecting it. Uh, it's also, the elevation of the highway in my years that have been there, I think the elevation of the top of Paradise Ridge is about 3,000 feet. The fog level usually comes down about maybe 29 to 2,800. Most of the time this E-2 route will be fog-free. If it has fog on it, it will also, an uh, come down into the old 95 and the western route. The western route will have much more drifting snow area that it has to blow snow across those flats and pick up snow for drifts will be good. I want to commend the Idaho Department of Transportation for the road that they have built already. The engineering on it is very good. As you go south to Lewiston, you will find very few places where you have any drifting on that highway. The safety of it is very good. The, you have good vision on both sides of the road. You	

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			have not got any places where you don't have good visibility as you're driving that route. The E-2 route will be an extension of that, and I think that's another reason we would like to have the E-2 route. I think the E-2 route is the preference of most of the majority of the major landholders in that area. And I think it should be a factor to the, to the Idaho Department of Transportation that they take the weight of the people who are going to be impacted the most by this highway. Thank you.	
OM-3	Johann	Muneta	I'm Johann Muneta and my last name is spelled M-u-n-e-t-a. Moscow is in some ways not as fortunate as our neighbors to the south. We live at the confluence of two mighty rivers, the Clearwater and the Snake, or our neighbors to the north who live on the shores of world-class lakes, Coeur d'Alene and Pend Oreille, but here we do have some advantage. We are happily cradled by the scenic and wonderful Moscow Mountain and by our treasured Paradise Ridge. Can you wonder why the Moscow community is speaking out to preserve the integrity of our cherished Paradise Ridge area from becoming the site of a four-lane highway that could more easily and sensibly be built along the current highway route using alternative C-3? I speak not as a member of any community group, but as a concerned citizen. I'm a citizen who values her quality of life and our exquisite and natural land area, but also the safety of our residents and the integrity of	See response for L-13

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			businesses and homes along the route. My question now, as it was when this was first proposed in 2003, is why, why, why? I know that the Idaho Department of Transportation is dedicated to providing safe and sure highways for both local and not local travelers, and we thank the ITD for that. But that's what makes it impossible for me to understand why they would choose E-2, a route with a higher elevation subject to more ice, snow, wind, and rain over C-3, an alternative that is more satisfactory and will do far less damage to our culture, our scenery and our environment and our quality of life. The information provided by ITD states, lists the many advantages of C-3. This is the one they don't prefer. It requires less new right of way, paves only half as much prime farmland, has much less noise effects, has less than half of the visual impact, provides better emergency response time to local residents. All that sounds pretty good; however, the only substantial claim that's made for E-2 is that it's safer. Now, part of this whole safety business is extremely questionable because it, a lot of it is based, the, the claims you just heard of, based on weather studies that were made for only one-half of the winter months starting in January in 2005, an unusually mild year with no snow impact. We all want a highway soon and safe. I understand just talking to someone in the other room that one of the major safety differences	

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			between E-2 and C-3 is in the number of access points in the last five miles, the number of access points that could be reduced by having a frontage road, and this has not been part of the study or even considered. Everyone I've spoken to joins me in asking ITD to reconsider the unwise and unfortunate choice of E-2. Make the decision that would be safe and at the same time save our natural landmark, preserve Moscow's identity and unique natural beauty. I understand that even Idaho Fish and Game and the Corps of Engineers prefer alternative C-3, a safer and better choice. We want this highway soon, but it's going to be built for a long, long time, so we want to make a wise choice now. Please, ITD, don't let us down and persist in making the wrong decision. Thank you.	
OM-4	Farrell	Byington	Farrell Byington. It's F-a-r-r-e-l-l B-y-i-n-g-t-o-n. I'm speaking in support of the easterly route E-2 in the realignment of Highway 95. E-2 is the shortest and the straightest and most direct route for the last nine miles between Lewiston and Moscow on Highway 95. The need for realignment on the highway in this section…Can you hear me back there now? Um, the need for realignment on this highway in this section is obvious and necessary for several reasons, the first one being safety. How great it would be if we had the lives back that had been lost in the last four years on this section of road, not to mention those that are suffering or have been injured. Route E-2 is the straightest and	General Response Alternatives explains why FHWA and ITD identified the E-2 Alternatives as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			most direct route. It also saves driving time and gasoline consumption, thereby helping to protect the environment due to the reduction of both fuel consumption and gasoline emissions. E-2 has the fewest access points of all the suggested realignments, which is safety benefit and there are enough access points to serve the city area that it will [rest of comment inaudible]. All of us are concerned about the environment and let's not compromise the safety of those we love and who must travel on U.S. 95. I urge you to support route E-2 in the realignment of 95. Thank you.	
OM-5	Neil	Marzolf	My name is Neil Marzolf. I live at 3455 Highway 95 South, just right at the bottom of Reisenauer Hill. Hearing Officer: Neil, could you repeat your last name? Testifier: Marzolf. Hearing Officer: Could you spell that for me? Testifier: M-a-r-z-o-l-f. Hearing Officer: Thank you. Testifier: You're, you're welcome. You know, I hear a lot of people come here and talk about visibility, being unable to see the road. We see it every day. What I see every year is people that crash through into my yard where my four kids are. I pick cars out of my yard every winter. You ask the Idaho State Police, they're always there. I go, I go to bed every night worrying about a car coming over that hill and crashing into my house. My alternative, W-4, C-3 or E-2. W-4 takes my	See V-3 for a response to similar comments. General Responses Weather-5 discusses the relative differences in fog between alternatives.

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			house. C-3 takes my house. This is a route that, this is, uh, a house. We moved to Moscow, my wife works at the University. We moved here, fell in love with the community. You guys all know why. That's why you're here, right, great place. We love it here. Bought this house from the Reisenauers, built in 1921; turned it into a five-bedroom, three-bath house, planted an orchard, built a fence, bought goats, decided to live here for the long haul and I love it. I have read the reports and I'm going to tell you what, if I honestly felt that where we live was the route that the road would go, I'd start looking for a house to buy. Unfortunately, I'm not willing to give up my house so that somebody could look at a ridge and not see the highway that goes through there. So all I'm going to say is that when you guys are thinking about this discussion, think about in the last 10 years. The last 10 years there's been 13 severely debilitating crashes on that road or 18, excuse me, 18. There's been five fatalities. Since I've lived there six years, you guys all drive by and see my house, I've lived there six years and I've improved that house. I've picked, I think, 11 vehicles out of our yard. The road needs a change. Idaho, I think you guys are doing a great job. The environmental study impact, I read it cover to cover. I read everything about it. E-2 is the most logical sense. If it wasn't, I'd pack up and move, so I hope that everybody follows through with E-2. Thank you.	

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OM-6	Willa	Geffre	My name is Willa Geffre, G-e-f-f-r-e. Uh, I came to listen. I hadn't planned to speak, but it's really hard to listen when you've lived in your home, uh, 44 years, raised your family and have businesses that when my, before my husband passed away, he built those businesses knowing that I'd be secure in where I'm living, and I, I, I can't compete with all these people and their knowledge. I just know that that's my home and that's where I want to stay, and thank you.	ITD staff checked and determined your home is along the C-3 Alternative. Based on our reevaluation of the potential impacts to residences and businesses, the C-3 Alternative would come close to your home but based on conceptual level information C-3 would not directly impact it. At this point, the E-2 Alternative, FHWA and ITD's Preferred Alternative, would also not directly impact your home. See General Response Displacements-1.
OM-7	Nora	Locken	Hello, my name is Nora Locken, L-o-c-k-e-n, and I live in Moscow. Um, I've read over a number of the documents and asked some questions here today of the various technical experts, and, uh, I guess it's really hard for me to say that I think it was a great study that was done, especially the weather impacts. To me, that, uh, portion of the study was majorly lacking. Theres, um, the only point at which C-3 is mentioned is on Reisenauer Hill which all three of the, uh, of the routes would pass through, and then following that, there's a point on, on the easterly side and a point far on the westerly side that actually isn't even on the west route that's located in Washington, um, so I have a hard time believing that C-3 was given any real credence with the weather study, and just having lived here for a number of years and looking up towards the ridge, I can tell you the fog settles. There's a fog line, um, and that fog line, frozen fog line, to my mind would certainly be encompassed in the easterly route and	General Response Weather-2 explains the validity of the referenced data set. The weather analysis does not just use a 5-month period in 2005 but is tied to a much larger 30+-year data set. The Weather Analysis was revised to include additional data and the findings remain valid. See General Response Weather-2 and Weather-8. General Response Weather-1 discusses how the C-3 Alternative was considered in the Safety Analyses. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, fog and other weather related road conditions. The divided median would help reduce head on collisions as described in the DEIS Section 2.4.2. General Response Displacement-1 offers clarification of residential and business impacts.

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			doubtfully, um, encompassed in the other routes. Now that's, unfortunately, I am no scientist, nor am I providing you a scientific study, so I'm just astonished that, uh, there was only one-year study done, 2005. It was not a typical year and seven years have gone by past then and yet there was no further information gathered? I mean, uh, ITD you've done some good work, but that's a big-time hole, a big hole, in the plan, and I think we should be talking a little bit about what the safety would look like if we had real weather data, and it's so hard to compare the current roadway as is, where you've got the situation, unfortunately, of coming down a curve on those slopes and you go into oncoming traffic and, yes, it's scary and, yes, something needs to be done about it, it really does; however, um, if we were to have the divided highway, 34 feet in between, I really do think we'd see a major difference on that central route and we'd get to use some of the current roadway that we've already done so much work on over the years, and it's unfortunate that people are impacted no matter where you put it, but let's impact the least amount of ground and go with alternative C-3.	
OM-8	Gerard	Connelley	My name is Gerard Connelley. I reside at 1824 East E, Moscow. I was born in Gritman Hospital in downtown Moscow in 1951. I graduated from St. Lewis's Kindergarten, St. Mary's Elementary, Moscow High School, and the University of	See response to H-40.

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			Idaho. My parents, grandparents, and two sisters are buried in the Moscow cemetery. I have two daughters who attend Moscow High School. The oldest is a senior and will be attending the University of Idaho in the fall. I owned and operated Tri-State, Idaho's largest independent retailer, for 33 years. I am a past president of the Moscow Chamber of Commerce. I still own the Tri-State building, as well as other commercial property in Moscow, so I get the importance of sound infrastructure to a thriving economy. We all depend on a thriving economy. Many years ago I came to the conclusion that it's impossible to do the right thing, so I gave up trying. I just try to be wrong in the right direction. You can't give your spouse the exact right amount of affection. You can't give your kids the exact right amount of discipline. You can't give poor people the right amount of assistance, so I try to give my spouse too much affection. I try to be too gentle on my kids rather than too hard on them. I try to be too generous with poor people rather than too stingy. Regarding the placement of the highway, we can come fairly close to having our cake and eating it, too, if we're smart about it. By using the E-3 route, we could have a much improved road without degrading the environment. Palouse Ridge in my view based on living here for over 60 years is one of the crown jewels of the Palouse. I am from the Teddy Roosevelt wing of the Republican party. I am for a strong economy,	

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			free enterprise, and environmental conservation. The thought of ripping up the landscape east of the current highway so that my children and grandchildren will only know a degraded environment in that area is profoundly depressing to me. Whatever the highway department does, it will be wrong. Everybody's explained to them why every option here is wrong, so I respectfully urge you to be wrong in the right direction. Do not do E-2. Do E-3. If you degrade the natural beauty of one of the best parts of our area, you could never go back and restore it. If you err on the side of environmental conservation, you can always go back and wreck it later. Thank you.	
OM-9	Dan	Schoenberg	My name is Dan Schoenberg, S-c-h-o-e-n-b-e-r-g, and I live at, uh, 3306 Cameron Road. So that's kind of sitting right at the top of the ridge, right near the E-2, uh, boundary areas. Um, first of all, you know, I think ITD, I, I think we need to compliment the staff just in all the information… Hearing Officer: They can't hear you. Testifier: I, I do think we need to compliment the staff on all the information they had to wade through, present, give to the public. There's pages and pages and pages of information. And that information allows everyone to form an opinion. Um, you know I, I'm directly adjacent to, uh, where the preferred alternative goes, and, uh, and looking at all the information, I can say that I prefer that E-2, um, option. I've sat on the Moscow Transportation	Thank you for your comments.

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			Commission, so I've had a long time to look at all the information, look at all the studies and the different alternatives that are out there. Um, you know, unfortunately, I, one knows with everything that's out there that, um, you're not going to please everyone. It just isn't a possibility and, uh, we need to recognize that, um, and take the information that's presented, have your opinion, everyone's, everyone has a right to that opinion, and as I said, ours is that, uh, we would prefer to go with the alternative as presented.	
OM-10	Susan Snow Farms	Flack	Thank you. My name is Susan Flack, F-l-a-c-k, and I, uh, would like to, um, say that my preference is E-2 based on a lot of reasons, some of which have already been mentioned. I'd like to add to that, that my family, my maiden name is Snow. I came here, my family came here in a wagon train in the 1800's, and, uh, along with, uh, the Clyde family and we have lived in the area, my husband and I have lived in the area, um, 40 years farming directly across from the butte and have a lot of years of experience with the weather and all the other factors that have been mentioned. Um, there is clearly a difference of opinion in terms of the weather, but having lived there all those years, most, most of my life, I can tell you , um, even though the study that was done was of, of a short amount of time, the facts that have been put out by some of the opposition are clearly not true, and the weather is warmer up on the butte, up on the, on the, uh, ridge, than it is down below, and the fog line is definitely	See Response for V-10

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			higher than where the, uh, intended E-3 road would be. And as far as the beauty is concerned, I can't think of anything, uh, more attractive to people entering into our community than corning across the ridge and seeing the beautiful area of Moscow, and in my opinion, a road is not ugly. A road if it's well done, and the road to Genesee you can tell is well done, so the beauty factor to me is that, uh, it can be done well and it can be an addition to our community. Um, I would also like to say that I think the people who live in the area who are impacted more by the, by the road because they own property, they pay taxes on it, they are there impacted every day, I think some of their opinions should be considered more than people who are not as involved, and I would like to again express that our opinion is that definitely the E-2 route is the best, and we think that the ITD has done an excellent job of putting this information together, and we thank you.	
OM-11	Jim Greater Moscow Alliance	Anderson	I'd like to read a, I'd like to read a statement. My name is, uh, Jim Anderson, vice president of the Greater Moscow Alliance. The Greater Moscow Alliance is a 300-plus group of business people, community leaders and concerned citizens who support free market enterprise, private property rights and limited government. The GMA has long been supportive of High, Highway 95 improvement project between Lewiston and Moscow and we commend the Idaho Transportation Department for its thoughtful	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the

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			work in providing a plan that will be safer for all of us, mobility for all of us, and improve economic opportunities for all of us. We believe it's time to put this plan into action and move forward without any further delay. If 10 years of study in the different routes says the eastern E-2 is the way to go, then let's go on with it. We can, we can all appreciate the various concerns individuals may have against one route or another, but it's time to put those interests of the greater Moscow ahead of individual interests in making Moscow a greater place to live, work, and do business. Thank you.	Mobility and Road User Cost Study (ITD, 2014a). General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
OM-12	Al Paradise Ridge Defense Coalition	Poplawsky	Go ahead and turn off your cell phones. I'm Al Poplawsky. That's A-l-P-o-p-l-a-w-s-k-y with the Paradise Ridge Defense Coalition and, uh, we support a safe route from Thorncreek to Moscow and also feel there should be consideration of both environmental and socioeconomic, uh, factors, consequences. Improved safety is a major part of the purpose and need of the DEIS, and the DEIS states that all three analyzed alternatives, E-2, C-3 and W-4, meet the purpose and need. However, the DEIS also states that E-2 is the safest of the three alternatives, and this is based on a safety study that does not include weather, and this is a big concern for us. Um, the DEIS states that 57 percent of the accidents on this stretch of the highway occur during inclement weather, so weather is a huge factor here in terms of safety, and weather is not	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The weather analysis was updated to clarify the confusion that seems to exist. The referenced five-month data set is a calibration method to see how the weather ranks in relation to the larger 30+-year data set as explained in General Response Weather-2. General Response Weather-8 explains the validity of the Weather Analysis. The Safety Analyses does consider weather but it is included in the crash factors within the safety model. See General Response Weather-3, Weather-4, Weather-5, Weather-6 and Weather-7 regarding elevation, ice, snow, fog and other weather conditions between alternatives. General Response

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			included because the DEIS weather analysis concluded that weather is not different between the three different alternatives. Um, the people, everybody I've talked to that lives on Paradise Ridge will argue with you about that quite vociferously. Um, the weather analysis was done for only January to May of 2005, five months, not even one complete winter, and, uh, this was one of the mildest winters in recent history. There wasn't even any snow on the ground, um, so they were unable to analyze snow because there wasn't any snow on the ground, and in addition, only the eastern and western alternatives were included in the weather analysis, not the central alternative. Um, so we consider the weather analysis very deficient, and without weather considerations, we consider the safety study seriously flawed, so, um, we really don't feel that the, uh, safety study can be used, be used reliably to predict differences between the different alternatives. In terms of socio, socioeconomic factors comparing C-3 to E-2, C-3 requires less new right of way, paves over only half as much prime farmland, much less noise effects, less than half the visual impact, more compatible with Moscow land use goals. This is all in the DEIS, and, uh, better emergency response times to local residents. C-3 is 0.09 miles longer. It's going to be a little slower and, uh, C-3 will dislocate several more businesses. Still, by my count, C-3 seems to be superior in terms of socioeconomic factors. In terms of	Weather-1 discusses how the C-3 Alternative was evaluated in the Weather Analyses. See General Response Safety-6 regarding the significance of differences in length and safety between alternatives. The E-2 Alternative would not directly affect any sensitive plant species but would result in the removal of 3.9 acres of planted pine stand while not considered sensitive species, do provide habitat for wildlife including pygmy nuthatch, long eared myotis and northern alligator lizard. The E-2 Alternative would not directly impact any Palouse remnants including the Paradise Ridge remnant. Indirect effects to the Palouse remnants and Paradise Ridge as a result of weeds are described in General Response Weeds. Additional information regarding Palouse remnants including Paradise Ridge and indirect and cumulative effects is provided in the FEIS Chapter 6, Indirect and Cumulative Effects. See General Response Displacement-1 for a clarification of residential and business impacts. General Response Safety-1 describes why the C-3 Alternative with frontage roads added was not forwarded for further consideration.

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			environmental factors, there's no comparison. E-2 affects twice the wetland acres of C-3. E-2 wipes out 4.4 acres of moderate ungulate habitat; C-3, none. E-2 destroys four acres of sensitive species; C-3, none, uh, habitat; and, uh, uh, C…uh, E-2 has at least twice the impact on the native Palouse Prairie that C-3 has, and I think it's probably even more than twice, because, uh, well, Tim will tell you about that next, but it, uh, has a huge impact on the prairie up on the ridge. Um, C-3 is clearly superior in socioeconomic and environmental considerations, and we feel no valid comparison can be made with safety between these alternatives, so we encourage ITD to take a closer look at C-3 and, uh, how it might be made even better or safer, for example, by the addition of frontage roads. Thank you.	
OM-13	Tim _____ Palouse Prairie Foundation	Hatten	My name is Tim Hatten and that's, uh, H-a-t-t-e-n, and I'm on the board of directors with the Palouse Prairie Foundation. If you're not familiar with the Palouse Prairie Foundation, it's a nonprofit organization dedicated to the conservation and restoration of prairie in the Palouse bio-region. An important point I'd like to make here is the Palouse Praire is recognized by numerous scientists as an endangered ecosystem with less than point or with less than 0.1 percent of the prairie remaining. Let me repeat that, less than 0.1 percent. That's less than a tenth of a percent of Palouse Prairie remains.	ITD recognizes that the Palouse Prairie is considered by many agencies to be an endangered ecosystem as stated in the DEIS Section 3.8.3 and that that weeds are a threat to the remaining Palouse Prairie remnants. Mitigation for weed dispersal and establishment will involve minimizing soil disturbance, revegetating bare soils to reduce risk of establishment, and species selection that will consider quick and sustainable groundcover. Additional mitigation measures are described in the FEIS Chapter 9, Environmental Commitments. See General Response Weeds. More information from the Vegetation Technical Reports has also been added into the FEIS Sections 3.8 and 4.8.

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			Um, Palouse Prairie Foundation is unequivocally opposed to the preferred alternative E-2. Um, the primary reason we're opposed to it is because the technical reports and the draft EIS, um, show in their, the various analyses that over twice as many prairie frontage will be impacted by the preferred alternative than by the other routes, C-3 or W-4. That's unacceptable to us. The primary way that, um, uh, the prairie is going to be impacted by E-2 in a way much more seriously than the other alternatives is going to be from weed infestation. If you look at the technical reports and dive into those technical reports, the vegetation technical report, it's very good, I highly recommend you get into it, and what is shown in the report by, uh, Dr. Lass and Dr. Prather from the U of I is that they predict weed infestation will extend one kilometer on either side of each of the alternatives. Now, one kilometer on each side. The reason why that's very, uh, troubling for the Palouse Prairie Foundation is on E-2 because it's further east and because it's higher in elevation, closer farther up the ridge, that, that, one kilometer zone of weed infestation is going to take those weeds right to the top of Paradise Ridge, not just part way up, to the top. And the top of Paradise Ridge from people that live around here, um, they can tell you that's, that's where the most pristine, uh, pieces of Palouse Prairie reside, the largest patches, the highest quality patches. The technical reports, uh, bear this out quite well, so	Additional information regarding the Palouse Prairie ecosystem including more recent occurrence data and potential impacts to pollinators and giant Palouse earthworm was added to the FEIS Sections 3.8.3 and 4.8.3 as described in General Response Wildlife.

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			we cannot, uh, accept the preferred alternative. I'd also just like to make a statement that, uh, in the DEIS, it says that the Palouse Giant Earthworm does not occur in the project area. That's completely false. Uh, there's been at least four specimens found in the last three years, I believe it's three, maybe four years, but four of them found up on Paradise Ridge, two of them in prairie, two of them in forest. They're up there. The report also states that there's no suitable habitat for the worm up on Paradise Ridge. That's complete nonsense. It's absolutely their habitat. That's where they're found. Um, and then I'd just like to say that I would certainly like to see some inclusion, some discussion in the, uh, the next version of the DEIS concerning pollinators that's not been in this report on pollinators. I think the reason being is there's very few threatening or endangered pollinators in our region, but nevertheless, flowering plants cannot exist without their pollinators and the weed infestation and deterioration that I'm talking about here as discussed in the technical reports, that will affect pollinators. That's going to have effects upon plant populations and it's just, it, it's just a, a food web that's going to be hurt and in decline from this, so Palouse Prairie Foundation is opposed to the preferred alternative. Thank you.	
OM-14	Mary	Ullrich	I'm Mary Ullrich, that's U-l-l-r-i-c-h. My husband and I have had the good fortune to live in the beautiful Palouse for almost four decades now	See General Response Agency-1 regarding the difference in opinions regarding ITD and FWHA's Preferred Alternative. Also, for clarification, the US

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			and we highly value its unique environment. As Tim just said, some of the largest remnants of the original Palouse Prairie as well as forests and diverse wildlife occur here. Paradise Ridge deserves reverence. Paradise Ridge along with the other Palouse buttes is a unique ancient mountaintop remnant of the original western edge of the Rocky Mountains in the North American continent. My question today is why ITD would insist on invading and negatively upsetting this ecosystem when they have designed two other safe, acceptable alignments meeting state and federal highway standards. I would like to point out that in the DEIS report, it states the Idaho Department of Fish and Game, the U.S. Fish and Wildlife Service, the Environmental Protection Agency, and the Army Corps of Engineers all indicated that their preferred alternative is the central route, C-3. Interesting that this information appears in the executive summary in the DEIS in the section level 1.4, alternatives screening, bullet Number 1, public involvement and agency coordination, page 8. Why didn't ITD follow the preference of so many advising agencies? Why did they even consult them? The DEIS report also reveals that Idaho Fish and Game has stood up against the eastern alignment from the beginning; however, ITD has continued to pursue support for the eastern alignment, spending more money, more time to try to justify their preference. Both Dr.	Army Corps of Engineers has not identified a Preferred Alternative at this time. The DEIS Section 3.8.3 states the conclusions of the Wildlife experts, that the E-2 Alternative would affect low to moderate or marginal quality habitat for ungulates. The DEIS states per the Wildlife experts conclusions, that there is no critical or high quality big game habitat that would be affected and that mitigation for population level effects was not warranted. Information regarding the wildlife experts opinions and recommendations are in the DEIS and FEIS Chapter 1. See General Response Wildlife-1 and Safety-2 for additional information regarding wildlife habitat and wildlife collisions. The clearing of vegetation within the clear zone would be done to meet AASHTO standards and will not only increase sight distance but will also discourage wildlife from hiding and browsing near the roadway. FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. There is no hidden agenda for the preference of the E-2 Alternative. The public Involvement under NEPA encourages all facets of the public to participate in the environmental process.

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			Wayne Melquist, wildlife study done in 2005, and Dr. Bill Ruediger, wildlife study done in 2007, concluded quote, "The eastern E-2 alternative posed the largest concern for big game among the three alternatives being considered." Not satisfied, ITD then went to the outside to garner support. December 2010 they hired Hall Sawyer of Western Ecosystems Technology, Incorporated from Cheyenne, Wyoming, and involved Holland & Hart, LLP of Salt Lake City, Utah. In Hall Sawyer's report, he states quote, "The eastern E-2 alternative posed the largest concern for big game among the three alternatives being considered." In the executive summary of the DEIS under topics of concern and controversy, it states quote, "There has been disagreement between Idaho Fish and Game and ITD regarding appropriate mitigation," and this is then, um, explained over quite a few pages over 2006-2007. In the safety analysis of the DEIS in the section titled Wild Animal Crashes, it states quote, "Alternative 2-E, E-2 has potential to have more wild animal crashes than C-3 and W-4 because of the 1.98 mile long length of alternative E-2 within ungulate impact area; however, a wildlife crash countermeasure that clears the roadside of trees and brush will be constructed"; in other way, in other words, mitigation destroys additional wildlife habitat on top of that destroyed by the four-lane highway. Finally, my question goes back to why, why this	

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			trail of insistence on pursuing the most environmentally disruptive alignment when other alignments can satisfy. What is ITD's hidden agenda here? It is proposed that we request our local state legislative representatives look into this matter.	
OM-15	Steve	Ullrich	My name is Steve Ullrich. I'm related by marriage to Mary. U-l-l-r-i-c-h, and I'm actually delivering a testimony from Mark Wray and, and his name is, is spelled W-r-a-y, and I'm going to read this. It came from an email. He says, "Unfortunately, I'm battling 120 mile an hour winds right now and I'm in a slow jet on my way home from Philly and Charlotte, so won't get to Pullman until about 6:30 or 6:40." I was going to give testimony to the real weather differences experienced on the ridge and so I offered to give, to give his testimony. I have only been on the west slope for two years. We have come to know that the weather difference between the current alignment and the proposed is substantial, and I would edit in here that, uh, my two years is much longer than the five months January to May 2005 weather study. So Mark lives up on Paradise Ridge. The worst weather differences seem to be when the temperature is just above freezing in Moscow. As you begin to climb, the temperature begins to drop with about two degrees' difference. If there's moisture in the air or you enter the fog as you climb, the temperature is even more drastic, three to four degrees. This is because of the	See General Response Weather-2 regarding the referenced weather data and how it relates to the larger 30+-year data set. Many of your comments regarding weather principles are consistent with and addressed in the Revised Weather Analysis. See General Response Weather-3, Weather-4, Weather-5, Weather-6 and Weather-7 regarding elevation, temperature, ice, snow, fog and wind, and other weather conditions. See General Response Weather-8 regarding the validity of the Weather Analysis.

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			difference between the dry and wet adiabatic lapse rates, but I believe is exaggerated because of the upslope of the air mass as it pushes up the ridge. See, he's a pilot, so he understands some meteorology. Uh, I believe there was testimony, uh, this afternoon's session that indicated that the temperature rises up the ridge and it's cooler down below. Well, that's true in the summer. We can actually see, and Mary and I live up on Paradise Ridge as well, we can see 10 degrees' difference between, um, where Fountains' airstrip is at the point of where, um, the South Fork of the Palouse River crosses, um, Paradise Ridge Road and our house. In the summertime, we don't cool off at night, but in the wintertime, it's just the opposite, so when we drove down today, this afternoon, it was 33 at our house. It was 36 by the time we got down to Palouse River Drive. Anyways, for experience, I have noticed it rain in Moscow and an absolute blizzard at my house with feet of drifting snow. And the issue that, or the that point that Al made about, about no snow the year the weather study was concerned, um, now the snow and the wet and the wind were not considered, and you put those together and it makes a huge difference in the drifting possibilities. And then he says I know that Mary and Steve can attest to this, also. Indeed, between our two properties, we observe about 75 percent of the E-2 route and C-2 or C-3.	

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			I have heard of a stretch of highway in southern Idaho that is split four-lane. The westbound lanes climb up about 400 feet above the eastbound lanes because of the topography. Apparently, the accident rate is much higher in the higher side of the highway due to the weather changes. Ice due to freezing fog and high winds are the biggest reason. Unfortunately, the person telling me this lives in the south, but could not identify the stretch. She knew it had factual, but no details. I'm to find out more about this and report back with facts later. It is my belief that the weather issue for safety sake needs to be a highly discussed issue. It is something that everyone can relate to because of how open and exposed the E-2 highway, the E-2 alternative will be and its elevation changes as it traverses the ridge, in my opinion, that you see much more severe weather than any stretch of this highway. Thank you.	
OM-16	Janice	Willard	My notes are a little disorganized, so hopefully, I'll be able to talk off the cuff here and, and uh [rest of comment inaudible]. My name is Janice Willard. I live in Moscow, Idaho on the east side of town. My notes are a little disorganized so hopefully, I can, uh, remember to express everything that I wanted to, uh, speak to you about. Hearing Officer: Spell your last name. Testifier: W-i-l-l-a-r-d. Hearing Officer: Okay. Testifier: A week ago last Thursday I was trying to	See General Response Weather-2 regarding how the five-month weather data set is tied to a 30+-year data set. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Response Weather-3, Weather-4, Weather-5 and Weather-6 regarding elevation, temperature, ice, snow, fog, wind, and freezing rain. The E-2 Alternative will not go over Paradise Ridge but will be located along its base. See General Response Safety-2 regarding how wildlife was considered in the Safety Analysis. General Response Weather-8 addresses the validity

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			drive down to Lewiston. I needed to go down in the afternoon to just pay a bill for something and it wasn't an absolute need, and as I hit the road, I got met by a combination of ice on the road, plus horizontal blowing winds, uh, winds coming out of the west and, um, it was scary. I, I had an all-wheel drive car with good tires and I was having a difficult time staying on the road. When I passed the second truck pulled off the road, I kind of took that as a sign that maybe this wasn't a good time for me to be trying to make a quick trip down to Lewiston, and right at Thorncreek, I turned around and I came back to Moscow, again fighting the winds and driving barely 35 miles an hour on the road. I can't even imagine how bad it was up on the ridge above me when it was bad enough that somebody who grew up driving Idaho roads, I grew up driving southern Idaho roads, really nasty ones, too, and I'm pretty gutsy about what I'll, what I'll drive through, decided that if I didn't absolutely have to be on the road that day, it was probably a pretty good idea that I shouldn't, and this was on the stretch of road that's down protected by the rid--, by the drainage is where it runs. Uh, this is on the current road rather than up there on that hillside where I imagine the winds are much, much worse. Where I live east of Moscow, I have, um, a private road that runs north-south. The winds here blow east-west. We get snowed in all the time and I can imagine that up on the ridge there	of the Weather Analysis and how weather was considered in the safety analysis. Visual and noise impacts along the E-2 Alternative are described in DEIS and FEIS Sections 4.11 and 4.12. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. –

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			it's even worse. Living on the east side of town where I am, I get up every morning and I look out over Paradise Ridge, and what I often notice is that Paradise Ridge seems to have its own weather. It, uh, everywhere else can be clear and there's a clump, like a hat of clouds, up on the ridge. That hat of clouds which will be fog, which will give freezing rain, which will put a lot of frost is always right up coming to a, a, the brim of the hat right where they want to put this highway, which makes me wonder why in the world are they thinking that this is a safer way to go. I believe that the safety study done was flawed. It was done at the wrong time of year and it didn't take into account normal conditions for this, for this area. Um, I think that the safety is also flawed because it has not taken into account wildlife collisions, which are also, um, a fairly dangerous thing to have happen, and, um, I, I just think that the whole thing is not, hasn't been well thought through for, for the, see, how am I going to put this? We, we in Moscow, especially all of us on the east side of Moscow, we look up over a beautiful jewel. When we look south, we see this beautiful ridge up there. How is that going to look when it has a whole bunch of headlights coming right over the shoulder of it? Our beautiful jewel will be gone. We will have light coming over there. We will have more noise coming from the cars coming over there. Um, I personally just don't understand ITD's constant insistence upon taking	

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			this highway over Paradise Ridge. I think somebody came up with this idea years ago and, and they're so invested in maintaining this that, that we've gone through all of this rigamarole and they come right back around to what they came up with years ago without really listening to the people who live here, who, who see the ice and the snow up there and keep saying this isn't safe, you need to pay attention to us. So, um, okay. I am out of time and I've covered some of the things here. Um, yes. But I just want to say that I just think this is a bad idea. I do not think E-2, I'm not certain as to whether which of the other two, um, ones would be better. I don't have a strong opinion on that. Those of you who know me know that's a rare thing for me to not have a strong opinion, uh, but I do have a strong opinion that E-2 is a poor choice.	
OM-17	Cindy Great Old Broads for Wilderness	Magnuson	Well, it's right at my height. Cindy Magnuson, M-a-g-n-u-s-o-n. I represent the Great Old Broads for Wilderness, which is a national organization of proponents for wildlands. Our local group has spent the last few years helping to eradicate the, eradicate the invasive weeds from the ridge. It's been wonderful to see the native species flourish and it's such a privilege to be on top overlooking our Moscow. Last week I attended a hearing in Orofino, uh, to try to protect the North Fork of the Clearwater River from mining. Hearing the Nez Perce remind us all by stating, "We belong to the land, not the	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would be closer to Paradise Ridge compared to the other alternatives and could result in indirect effects as described in the DEIS and FEIS Chapter 6. See General Response Weeds and Wildlife. General Response Displacement-1 offers clarification regarding residential and business impacts. As stated in the DEIS, the E-2 Alternative would affect more acres of prime farmland soils but would

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			other way around." It moved me as to how precious our undeveloped lands are. The lands will be here long after us, if we're able to protect them. The Nez Perce know plenty about losing land. Our Paradise Ridge with a highway close by will be impacted by noise, all types of debris and pollution. We will lose its beauty and the ridge will lose its remaining native, native vegetations. I wish no malice towards those whose homes or/and businesses are threatened by the C-3 alternative, because 50 years ago we lost our road, our home to a highway. We didn't get to have deliberations or anything. We received a letter in the mail and you will be moving, you know, in six months. Houses, businesses and, yes, highways are all constructed for people. Please look to the future and the ability we have to now protect those beautiful lands which are irreplaceable.	avoid the most productive farmland that is located along the Modified W-4 Alternative. The C-3 Alternative would affect the least farmland. The width of the right-of-way is based on the design elements as described in the DEIS and FEIS Section 2.4.2.
OM-18	John	Snyder	My name is John Snyder, S-n-y-d-e-r. Audience member: I can't hear you. Testifier: John Snyder. I was born in Moscow and raised here and I've absorbed the quality of life. I moved away and I came back. I lived along the Wasatch Front for 25 years and saw a lot of its native virtues change by population growth and development, and so there are things that, that I feel strongly about, and I want to go on record as an, as an advocate of prime farmland preservation and as a opponent of the E-2 alternative.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The right-of-way for the action alternatives was based upon a conceptual level of detail and a worst-case scenario. It factors in design elements that would address the identified deficiencies. It would be comprised of two 12-ft. lanes in each direction, a

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			Of all the, all the alternatives, though, I think share a common flaw, though and that is the amount of agricultural land that's destroyed. The right of way is too wide. I think it must be at least 100 feet. It's been applied to the land. I, I think I'd simply like to say that I, I think that we should fit the highway to the land and not the land to the highway. Apparently, the project director has decided that the clear space between the two lanes, the four lanes, and believe me, I'm, I'm an advocate of safety and safe road, I, I understand the need for double lanes on both sides, but the right of way itself, for example, between the top of Lewiston Hill and Thorncreek Road, I think, is overkill. I don't think we need something suitable for a military invasion. It's a state highway and I'd just like to conclude by saying that the quality of life iss-- the quality of life issues are important, aesthetics are important. Agricultural land once altered can never be replaced. We have the best land in the world here and I want to speak, speak to preservation of that.	34 ft. median, shoulders that would accommodate bicycle/pedestrians, and the clear zone, which would vary depending on location and speed. See the FEIS Section 2.4.2. Additional area is needed depending on the topography of the area and the need for cuts and fills. ITD has committed to mitigation measures that would minimize impacts to quality of life, aesthetics, and farmland. See Chapter 9, Environmental Commitments. While the E-2 Alternative would have the greatest impact to prime farmland soils, the Modified W-4 Alternative would have the greatest effect to the most productive farmed land as described in the DEIS Section 4.3.
OM-19	Pamela	Brunsfeld	My name is Pamela Brunsfeld, B-r-u-n-s-f-e-l-d. And I am the curator of the University of Idaho Stillinger Herbarium and I have been a professional botanist… Hearing Officer: You have to come up to the mike. Testifier: I'm the curator of the University of Idaho Stillinger Herbarium and I've been a professional botanist since the mid-1970s. Um,	General Response Weeds discusses the alternatives' indirect effects to vegetation. Mitigation for weed dispersal and establishment will involve minimizing soil disturbance, revegetating bare soils to reduce risk of establishment, and species selection that will consider quick and sustainable groundcover. Additional mitigation measures are described in the FEIS Chapter 9, Environmental Commitments.

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			between these two roles, I have firsthand over the decades watched the vegetation in Idaho change. For those of you that don't know what a herbarium is, it's like a plant library. Um, the University of Idaho Stillinger Herbarium is the official herbarium for the State of Idaho and we have over 200,000 specimens, um, that were collected starting in the mid-1800's, so what this does is it offers us a historical perspective of the changing vegetation in Idaho. Um, when I first began to notice, um, things were rapidly changing around here was probably about the time that we first started talking about climate change, about maybe 15 to 20 years ago, and I don't think there's anybody in this room who's been around two or three decades who hasn't noticed the changing ecosystems up on the Selway and the Lochsa River. Before we used to have these beautiful native vegetation stands, now it's full of spotted knapweed. Um what, what is being proposed here if we adopt E-2 is the same thing will happen. Um, man-made activity opens up disturbed habitat and invasive species move in. Most of these invasive species come from the Mediterranean. Native vegetation can't outcompete them. Um, probably the biggest problem is spotted knapweed. For those of you not aware of what spotted knapweed does, it has allelopathic properties, it releases a chemical into the ground. Within seconds the root cap of a native vegetation explodes. Nothing can grow on that	See General Response Safety-5 regarding improvements near Reisenauer Hill.

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			land, so if, if we're talking about mitigation and we're just going to, you know, plant more native plants, there's not a solution. So as Tim mentioned, we're very, very lucky to live in this beautiful place where we have this very unique, endangered ecosystem. And um, um, I am like everybody else, that what we need an alternative to the road we have. Reisenauer Hill is extremely dangerous, but I encourage the ITD to look at another route other than E-2 so we can leave this incredibly beautiful, valuable ecosystem to our children, our grandchildren, and future generations.	
OM-20	Zachary	Johnson	My name is Zachary Johnson. The last name is spelled J-o-h-n-s-o-n. Hearing officer: Is that o-n? Testifier: o-n, yeah. All right, I disagree with ITD's proposal to reroute U.S. 95 along the E-2 alignment. The E-2 alignment presents significant risks to wildlife living on and moving through the Paradise Ridge area. Additionally, by disturbing land close to one of the largest remaining Palouse Prairie remnants, E-2 will invite, uh, will invite invasive plant species to take over native species along Paradise Ridge, as Tim explained earlier. As shown in the vegetation technical report, weeds will extend to six-tenths of a mile from the roadbed, and this will take weeds pretty much all the way to the top of Paradise Ridge, and as the winds in the area move from east to west, or I'm sorry, from west to east, they will	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. General Response Weather-2 explains the validity of the referenced data set, which was used to rank the larger 30+-year data set. General Response Safety-7 discusses the validity of the Safety Analyses. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. However, for clarification, the US Army Corps of Engineers has not chosen a preferred alternative at this time.

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			likely blow more seeds over to the top of Paradise Ridge that will eventually create a giant invasive weed patch along our beautiful Paradise Ridge. I strongly am against this and the science proves it. It's in the vegetation technical report. You can read it for yourself. Uh, this takes, okay, so this invasion will further threaten rare species also found on Paradise Ridge, including plants and animals. I'm also skeptical on the safety analysis compiled using weather data from January to May 2005 which was a drought year and one of the most mild winters in recent history, so the weather component of their safety analysis seems to be really flawed, they're only looking at five months during a year in which it was quite abnormal, much warmer than normal, much less precipitation than normal, so this weather data is, is flawed, and so how can such an analysis based on this data be anything but flawed, and why is there no data from the past seven years? Why is there only data from this five-month period in 2005? I don't understand. While I do support the realignment of U.S. 95 to make travel safer, I doubt the DEIS findings on weather analysis. I urge ITD to reexamine the flawed safety study and seriously consider the C-3 route as a preferred alternative. Idaho Fish and Game, the EPA, the Fish and Wildlife Service, the Army Corps of Engineers, they all prefer the central route. Why does ITD insist on the eastern route when the central route fills the ultimate	While the E-2 Alternative would impact the greatest acres of prime farmland soils, the highest producing farm fields are located along the Modified W-4 Alternative as discussed in Section 4.3.

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			requirements of highway standards and invites less, um, argument from these agencies? The central route has less miles of right-of-way acquisition required. It's endorsed by several pertinent agencies, the ones that I just listed, and will sacrifice less prime farmland than the, uh, than the eastern route. It won't damage the Paradise Ridge view as much and will have the least amount of impact on our precious and endangered Palouse Prairie. Again, I am for making U.S. 95 safer, but I'm baffled by ITD's insistence on the E-2 alternative. Don't pave Paradise.	
OM-21	David	Sass	Yeah, my name's David Sass, S-a-s-s. We live on Thorncreek Road. We have, uh, four boys that are traveling that road every day to the University of Idaho. Uh, it's a very unsafe road. I think it's too bad it didn't get built the first time and we're fully supporting the current proposal and I just hope it gets built. And, uh, I think everybody that has been injured or hurt since the road was stopped, you know, who's guilty for that? And, uh, all I can say, we're fully supporting the current proposal.	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. The NEPA process is a thorough and lengthy environmental process that is required.
OM-22	Del Benson's Mobile Home Park	Hungerford	Hello, my name is Del Hungerford, last name H-u-n-g-e-r-f-o-r-d, and I see the four-minute thing there. I'll talk fast. Okay, I am a resident of Benson's Mobile Home Park which is in the proposed E-2 route. We all wore T-shirts. Anyway, um, I am in favor of whatever road is going to be the safest and if that includes me losing my home, fine, because I know a lot of	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. All displaced businesses and residents will be relocated according to the Uniform Relocation Act. See FEIS Appendix 5, Uniform Relocation Act and

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			people who have died on Reisenauer Hill. And I'm also going to speak in behalf of, um, my neighbors that live across the way from me, but a couple of things I need to bring up. We keep talking about Paradise Ridge and the habitat and I'm like okay, so I went and did this little map server search thing on the Latah County. There are 55 homesteads up there right now that are on, in or near Paradise Ridge. That doesn't count the five homes or businesses at the base of Paradise Ridge Road. If there are homes in the trees, you can't see them from the air, so I'm only counting the 55 that I can actually see. A large facility which I found out later is a horse arena which is right smack in the middle of all the trees. You can't miss it. Okay, there are five plats of land in the center that appear to be completely untouched. A sixth plat has a road going all the way through to it which leads to a seventh plat that's currently been designed, divided into four more little pieces of property in which I'm assuming people are going to build homes on, so 55 plus four, okay. The heaviest concentration of homes is on the north end of the ridge, followed by the east end. The west side, it looks like there's only eight homes that are facing the west side. Um, so from just the visual thing, it looks like a pretty good portion of Paradise Ridge has already been touched. So my question is if we're going to leave Paradise Ridge untouched, move the	General Response Displacement-1. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3. As stated in your comment, there are many private developments on Paradise Ridge that contribute to weed establishment and dispersal. However, FHWA and ITD would not have the authority to move homes off of Paradise Ridge and restore it to native habitat. More information has been added to Chapter 6, Indirect and Cumulative Effects regarding the existing and future developments based on the information provided. See General Response Weeds. General Response Access described the proposed Expressway Access Control and how it could limit development pressures. Additional information on noise including jake breaks is discussed in the FEIS Section 3.12. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. See General Response Schedule-1 regarding the environmental process and anticipated schedule.

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			homes off that are there and return it back to its natural habitat. And, you know, in looking at this, Pamela Brunsfeld just said, man-made activity opens up harm to native habitat. Every home on Paradise Ridge has had some disturbance because they've had to build homes. You dig up dirt. You move dirt around. You put things there. Everyone has weeds right next to their house, so if we're talking about Paradise Ridge, think about the 55 homes that are already up there. Every time I look up there, that's all I see. I see these beautiful, gorgeous 500,000, million dollar homes up there. It's wonderful. That's part of what's up there. Okay, again, as far as me personally is concerned, if it's E-2, which to me appears to be the safest route, I'm okay with losing my home, as long as Idaho Transportation Department takes care of me. From my neighbors' aspect, if we say I'm going to be living at the foot of a very tall embankment leading directly to the highway, I lived on a highway before, you know what jake brakes feel like? They would shake my entire house. I live in a trailer, so it's not a house. There's a lot of things that will affect us personally, which I will send a letter with that information because I see I have one minute, 10 seconds left. I'm a teacher, so I'm used to watching time. The other question is, if you are coming from Lewiston and you're coming down Reisenauer grade and you're turning onto Eid Road, I have to	

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			put my blinkers on at the top of Reisenauer and pump my brakes for the idiot behind me who doesn't see that I'm trying to turn onto Eid Road. There's many times I've had to turn so fast I had to practically run into the people that, up their driveway, so I don't spin out and land turning like this. People do not pay attention when you're trying to turn on and off the current highway. Every other road but E-2 has a lot more connecting roads into it. The more connecting roads you have, the more accidents you could see. E-2 is the only road that has the fewest amount of connecting roads into it, so I'm saying safety is more than just weather. Think of all the people who live along the current C-3 and who they, will be living. Think of all the businesses there. It's all about putting them all together, picking the best one and choosing it and if I have to lose my home, I'm okay with that for the better of the community. Zero and I'm done. Thank you. Oh, one last comment. If you guys are digging around in there and feeling it, make sure you look for the little plastic skeleton that we lost last year during the 4th of July. He's missing a couple of arms. Thanks.	
OM-23	Gary	Lester	Thank you. My name is Gary Lester, G-a-r-y L-e-s-t-e-r. Um, I am, I'm a resident of 1071 Eid Road. That's Benson's Mobile Home Court. We do have a T-shirt say you mess with me, you mess with the whole trailer court. So, um, we, um, I have some concerns. I'm very concerned that we need safety improvements. I've lived there since 1998.	See General Response Safety-4 regarding improvements to the existing US-95. Does this address why we have done nothing yet? See General Response Safety-2 regarding wildlife collisions. All displaced residents and businesses will be compensated according to the Uniform Relocation

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			Um, multiple times I have had to stop and, uh, on some occasions I've actually went into a field and helped a young man who was ejected from his car and he was, like, immobilized in the field. Um and its very, uh, fortunately, he survived, but, um, it's very frustrating to me to see this kind of unsafe conditions year after year. For the life of me, I do not know why Latah County and the highway department, the state highway department, have not straightened some curves, put a turn lane into Eid Road, done some basic, simple things. I don't know what, why nothing has been done to this point. So, um, I, uh, some, I am, the environmental concerns, I agree with, uh, the closer the Highway 95 is to, uh, Paradise Ridge the greater the number of collisions with wildlife will be. Uh, on the current route I have hit one deer, uh, right across from Bob Clyde's house. Um, uh, I had a near collision with a moose, uh, one night. And, uh, one night I was just about run off the road by a large and vicious raccoon. So, so but the closer that this road is to the bedding area of the wildlife up on the ridge, you will have a higher frequency of wildlife collisions, so, uh, wildlife, uh, management is going to be key for that E-2 route. I live directly under the proposed E-2 route. I live in a mobile home. Uh, I own the mobile home next to me. These two homes would be removed. Uh, Del is my neighbor and she would potentially stay because she's not under the right of way, so, uh, and I also have a few acres 1,000 feet to the east,	Act. See General Response Displacement-1 and FEIS Appendix 5. Access will be determined when more detailed geotechnical, survey and design detail is available. See General Response Access. ITD and FHWA will ensure that the project would not affect the quantity or quality of groundwater. Any wells that could be potentially contaminated will be relocated to a more suitable location. See General Response Water.

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			um, us, that I have that are undeveloped, uh, and I will lose access to that property when the E-2 route comes through, so there's a right-of-way access, uh, that I'm concerned about. The E-2 route takes up the local water supply for the community, uh, with a well and that well will need to be replaced or, um, moved, and if it is, uh, I would like to point out that it needs to be, uh, put upstream, a hydrologic gradient from the highway so that when the road salt runs off and everything and it will contaminate the groundwater eventually, so that well needs to be up, up gradient of the highway, and, um, that's all I have to say. Thank you.	
OM-24	Jim	MacDonald	Jim Macdonald. Um, uh, there's a lot of questions raised here, who and then whose blood, whose hands are bloody from the, the wrecks and all that. Uh, no one has asked about what's really going on. There's questions who, what, what might explain this, this ridiculous, uh, idea. Um, the ITD itself, you know, go to Boise, check the reputation of the ITD. The ITD itself is the lap dog of industry. It's a water carrier for industry. Uh, start thinking about that in this part of the country who might that be, who might have an interest in turning the highway into something akin, uh, to a slurry line. Y'all anybody know anything about mining, know what a slurry line is? Well, who might have an interest in this? The fact, and it's put out in the, the slick corporate brochures that it's .09 miles shorter. Well, it's also a straight shot. What this would	See OM-1 for responses to similar questions. US-95 is used for local circulation and access, commuters and regional travelers. It is also the only north-south highway in the Idaho Panhandle and therefore, ITD and FHWA must consider truck traffic as well as all other vehicles that utilize the roadway. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other

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			amount to is a slurry line for the chip trucks. That's what's really going on here. That's the undisclosed reason. That's the why, who's politically powerful here. Who's really running, uh, the ITD. It's the loggers. It's the chippers. It's the trucking industry. It's the paper mill down there. And if you have any illusions, uh, to the contrary, I'd like to try to, uh, uh, sell you a bridge. That's the practical point. That's what's really going on here. As usual, follow the money, money and politics, and there's a lot of politics going on, uh, here which will all come out if this is followed. Another point, a legal point, we're ultimately talking here about a official document that will be filed with the United States government. I have some experience, uh, in this area. Obviously, you can't make false statements, uh, nor can you fail, uh, to disclose material facts. If you look through all this material in the DEIS, the real reason for all this never comes out. The safety stuff as its been pointed out is obviously a sham. Uh, the, the whole report, uh, is a giant sham, uh, that was paid for, uh, by industry. That's what's really going on here, and there's going to be a lot of legal liability if you file false documents, uh, with the federal government. Uh, this crude plan seems ultimately to have gotten some crude legal, uh, advice. Do they really think they can file these false, uh, government reports? What naiveté, and, again, what naiveté in general not to realize what's really going on here. Follow the	public involvement activities as described in the FEIS Chapter 10. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			money, uh, and money and politics is, uh, is the ultimate answer here. Thank you.	
OM-25	Laurel	MacDonald	Laurel Macdonald. Macdonald. So we live on Paradise Ridge and I drive down that hill, so a lot of people have talked about, uh, safety issues and it's so scary driving down that hill. Uh, I put my rig into first wheel, you know, into, uh, first gear and I still slide and I'm only halfway up the ridge. We're right above Fab Tec, so that's only, you know, halfway and I can't imagine that people think this is going to be a safe, a safer route. It's really, uh, ferocious up there. It's outrageous. Its, uh, the wind is just, uh, pretty hard to reckon with. In the mornings, you know, um, when the easterlies come in, I'm kind of thrown as I walk out of my house, and later on the westerlies come in and I'm thrown as I walk out my house, so, you know, for anyone to think	General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Responses Weather-3 and Weather-6 address elevation, ice, and wind. General Response Safety-4 explains safety in relation to speed limits. See General Response Agency regarding the difference in opinions regarding ITD's Preferred Alternative. See General Response Weeds and Wildlife regarding effects to flora and fauna including the giant Palouse earthworm. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			that the wind isn't a huge factor is, is really, um, kind of astounding. And to think that this could be safer than Reisenauer Hill, and I really feel bad for all those people who have suffered losses from, because we all know that is a dangerous hill too, but how come the speed limit hasn't been reduced? How come things haven't happened there? Why isn't the, um, the ITD doing something about that to make a more safer road for us? Thank you, Jim. You have all the legal stuff, but for most of us we're just wondering why these things aren't happening and why we have to deal with that road that, that is so dangerous on the one hand, 95, and to think that there's going to be a four-lane over Paradise Ridge that has immensely huge ice problems and, and amazing winds just beggers the question. Uh, I think most of us have been confused. Jim has, uh, a really good answer why these things might be happening, um, but I think it's really something for us to think about, and I love the scientists who say, you know, the Palouse earthworms and the, the flies and, you know, the weeds that are going to come in, there's a host of problems, and all the EPA reports have said of course this is the worst route to take, but really, is anybody really considering that? I think people just kind of go, oh, yeah, that's a liberal thing. But, uh, yeah, I've dug up the Palouse earthworm in my garden. It's long and it's white and it's a big thing, but, uh, the reality is for most of us is we're concerned	

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			about the safety and people dying and, number one, people should be concerned why 95 isn't getting fixed. Why aren't number one, why isn't ITD putting the speed limit down to something safe? Why are they talking about raising it? I, it , it's pretty outrageous. I don't understand and, um, anyways, that's all I have to say. Thanks.	
OM-26	Cass	Davis	My name is Cass Davis, C-a double s, Davis. And I live at 1041 Iverson Road. That's actually up on Paradise Ridge in the, uh, the southeast corner. Um, I know a lot about Paradise Ridge. I've lived there 17 years and I hike up and down there all the time. I have a sign here. It says E-2 everything but safe and science. Um, reading through the DEIS, it's obvious that, that the science isn't there, that all the science agencies and the scientists who, who have looked at it and wrotten [sic] EIS's have said that E-2 is not really scientifically the sound way to go. Then there's the argument of safety. I live on Paradise Ridge. Many people here have testified about actually the fact that the weather patterns aren't exactly emblematic of their three months at the station in '05 when it was, like, a 30-year, warmest time it's been in 30 years. I mean, it's just not real. What is real is remember Y2K when everybody thought the, the world was coming to an end? I had a party up at my house. It was, we, we were going to see the end of the world, we were going to have a party on New Year's Eve, and the next morning I woke up and, and my power was out.	The DEIS was prepared according to ITD and FHWA NEPA Regulations. See General Response NEPA. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. See General Response Weather-3 regarding elevation, Weather-4 regarding precipitation and snow, Weather-5 regarding fog and Weather-6 regarding wind. See General Responses Weather-2 regarding how the referenced data set was used to rank the larger 30+-year data set. – Additional information regarding occurrences of the Giant Palouse earthworm and potential effects to this species has been added to the FEIS Section 3.8 and 4.8. The Giant Palouse Earthworm was not rejected from listing because it was too rare, but because it may be more widespread than previously thought. More information is required before ESA listing protections may be provided. Occurrence data includes not only the Palouse grasslands but also forested areas, areas in the North Cascades and Chelan. Regarding your request for the State Attorney

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			Well, why was the power out? It was because a tree had fallen on our electrical lines. As a matter of fact, all the trees were snapping behind my house and it ended up getting logged because of it. These trees were snapping because so much frost had set on us for days and days of us being stuck in a cloud where we didn't see any sunshine. We didn't see anything but fog, and it built on the trees and built on the trees. It went by for months and trees snapped off and busted. There's constantly a band of fog out that way. There's constantly weather change difference. I ski up at my house when people in Moscow are looking at a couple of inches. I live only 500 foot higher, so it's 1,000 foot higher in all, but the roads run at about that 500-foot level, and, uh, we, when it's raining here, like right now, marginal rain, it's likely it's snowing up at my house. It's likely it will be snowing where the E-2 alternative is going, too, when it's raining in this marginal time, so it's not really a safety issue to go up there. It, it doesn't really have anything to do with safe or science. Now, while I've got a little bit more time, I want to say I speak for the worm. I found, I found two Giant Palouse Earthworms last year above my house and this Palouse earthworm was petitioned to be put on the endangered species list and was rejected by the Fish and Wildlife Service because it was too rare. It was too rare to bother listing under the Endangered Species Act.	General to investigate conflict of interest corruption, ITD and FHWA have identified the E-2 Alternative as their Preferred Alternative because it would have the greatest safety benefit and in consideration of the human and natural environmental effects. See FEIS Section 2.6. The project was reviewed by the appropriate legal counsel prior to publication to ensure that NEPA requirements are met.

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			That is what the determination was, so few of them are found. Well, the reason they're on Paradise Ridge is because it hasn't been tilled up, because it isn't farmland, it's rocks and trees, but that species belongs here on the Palouse and used to spread all over the Palouse, but when you till it, you kill it, and if that species is ever to take foothold again on the Palouse, we need not have a road that's a barrier to stop it from spreading through the CRP lands and coming back down. That does it no good. I, something is fishy here. I would like to request that the state attorney general investigate this whole thing because it stinks of corruption. It stunk of corruption nine years ago. There's people who had a conflict of interest that were working for the ITD who had family members that would benefit from property sales on the ridge. It has never been investigated. It needs to be investigated. It should be investigated. It's a sham. Audience member: The attorney general is a former student of mine and if this goes through, I'll be in touch. Testifier: Thank you.	
OM-27	Frank	Merickel	My name's, uh, Frank Merickel. That's M-e-r-i-c-k-e-l. I live at 2946 Highway 95 South, and I've lived there for nearly 25 years. I too have lived in this area for one way or another through schooling for approximately 40 years. I think I know a lot of you people in this audience, okay.	ITD and FHWA understand the difficulty that this lengthy EIS process has had on your family. See General Response NEPA and Schedule for a description of the environmental process and the anticipated schedule. General Response Alternative explains why FHWA

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			Uh, I will be submitting extensive input. I guess from one fellow back there, I must be one of those ones overflowing with naiveté. I am a little intimidated by this audience. I can probably talk loud enough and I'm not going to be [inaudible] or piss off and I'm really happy to see that there's law enforcement here. I have not seen Al Gore yet, but I anticipate him showing up. I'm a bug person and, uh, I would dearly love to have a specimen of the Giant Palouse Earthworm in my, uh… Audience member: Hey buddy, I'm hard of hearing, can you please keep your mouth on the microphone? Testifier: Okay, I'm sorry. I, I wander. I did that in my thesis. Uh, I was, I have to keep within my four, uh, minutes. I want to say that this I feel is a very good day for Moscow and I feel it's a very sad day for Moscow. I prepared about 100 renditions of what I wanted to say tonight. I, my family and me have been held hostage by this highway. I have the strongest sentiments and I do not want to be blamed by editorials for lack of concern for the environment, because I've helped support many of these studies that these people are documenting. I've helped support the PCEI in all my efforts in outreach and identification, so please, spare your poison pens with me, and I've known Cindy Magnuson all my life. She educated my young children. We have the same names of our kids, so spare me the editorials, okay? I feel that I have a	and ITD identified the E-2 Alternative as the Preferred Alternative. ITD recognizes that Paradise Ridge is privately owned and that there is increasing private development on Paradise Ridge and that the development could continue; however, this is subject to the local planning regulations. All of the action alternatives would have Expressway Access Control, which would help reduce the potential for development off of US-95. See General Response Access. The numbers of developments was added to the FEIS Section 4.1 and Chapter 6, Indirect and Cumulative Effects. See General Response Displacement-1 for clarification regarding the residential and business impacts. Mitigation measures are listed in the FEIS Chapter 9, Environmental Commitments. In response to public comment, additional detail has also been provided regarding the past, present and reasonably foreseeable future developments that could affect Palouse Prairie including Paradise Ridge, which is privately owned.

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			transportation environmental, uh, engineer who says this is the best DEIS that the State of Idaho has ever produced. Now, I guess I'm naive. I'm going to stick with that environmentist, uh, uh, environmental, uh, engineer, okay. Uh, I want to reserve my comments, though, I think it's a good day, I support E-2. I think it will be, I hope it will be, the safest, uh, highway system, certainly much better and you don't need to tell me about traveling Highway 95. I, uh, every night we turn into our driveway and every one of you probably passes our house. We risk our lives and I won't describe, the, the, the woman there described it beautifully. I don't need to be redundant here. I would like to comment on the process, however. It want to, uh, I want to have a little exercise in etymology. That's not entomology, that's etymology, and I'm going to begin with the word our, o-u-r. Our as in yours and mine. Ours as in the North Fork of the Clearwater, God's grace to this country. Ours in terms of the Selway Bitterroot Wilderness. Ours in terms of the Frank Church River of No Return. There's no ours in Paradise Ridge. We all know who owns that. That entire ridge is privately owned. I've been thinking for 15 years while this process has gone on what have I seen change. It's as that woman stated, it's the number of houses that have come up on that ridge and do you know what this process, this, this is, this is going to do nothing but increase the number of houses.The second word I want to discuss is the word dislodge. I've heard	

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			dislodge used in talking points with some of these coalitions and resistance. I feel like I'm living in a Star Wars. My residence is one that will be dislodged. I have known the editorial writers of virtually all of these editorials for 30 years. I dislodge bee stings from my hands. I'm a beekeeper. I dislodge ticks from dogs. What is happening to my home and my property that I've cared deeply about for 25 years is it is being destroyed and it means a lot to me. Okay, bless me with the use of the right word. It's not being dislodged. It's not being dislocated, it is being destroyed, and it is not only my property, it is eight other residences as well as seven businesses if I have the facts correct. Okay, in all of these editorials that I have read, not one has ever expressed a little bit of my third word which is compassion. Where have we come as a community? Can you not in your editorial say I understand there was one exception just a day or two ago that I must have missed, for us that will lose everything, some compassion. We care about safety. We care about the environment. We care about all the same things. We have a lot to lose. I have my home, my property that I care immensely about. Do you know what this has done to me over the last 15 years while people have cruised and made improvements and built homes on Paradise Ridge? I would like the facts of how many homes have been built up there. I have done nothing because I cannot sell my home because it might be taken out by a	

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			highway. Who's going to buy a home that's going to be taken out by a highway? I don't make enough money to put an improvement in my home to take a loss, so I am held hostage by this process and all I ask is for a little bit of appreciation of that. If that is asking too much, I am ready to move, because if you cannot use compassion as neighbors to care about each other, I thought they did in this town. I care about the mitigation processes on E-2. I care about the people who will be impacted. I care about the environment, and I will do all that I can. I have helped these studies that are being thrown back at me. I have helped the PERI or whatever. I've done tons of outreach for this town. Show me a little, just a bit, you know, in your pig poison pen just a sentence for Frank who is going to lose it all, as well as the other residents who will lose their entire home, their entire property and everything that they have worked for. Thank you. I'm done.	
OM-28	Brett	Haverstick	My name is Brett Haverstick. I live at 415 South Pope Street. I live here in Moscow, Idaho. Hearing Officer: Spell your last name for me. Testifier: Sure, H-a-v-e-r-s-t-i-c-k. And I'm here today representing myself. I speak for no one else or no other organizations. I'm an environmentalist. I'm here to tell everyone that I care about safety just as much as, as the next man, woman or child. I'm here to tell everyone tonight that we can have public safety and we can still protect the place. My motto is why not	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Response Weather-3, Weather-4, Weather-5 and Weather-6 regarding ice, snow, rain, fog and wind. See General Response Wildlife and Safety-2

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			have both. I think it's really doable. Are there going to be winners and losers? Of course there will be. That's life, but the public good must be served. I've lived out on U S. 95 for two years between Eid Road, right near Eid Road, one slick, dangerous stretch of highway. I feel bad, I feel terrible for those families, friends, individuals that have suffered losses, deaths, injuries. No one, particularly myself being a proud environmentalist does not want to see that go on, nor do I want to see it continue in the future. Don't pave Paradise. It's about public safety as much as it is about anything else. Fog, ice, snow, rain, wind, visibility, wildlife crossings, a stretch of highway that is going to be built to handle speeds of 70 miles an hour. Speed and weather conditions kill. Now I, I'm, I'm going to double-check my notes when I go here on the draft environmental impact statement and if I am wrong, I'd like someone to correct me. I believe that if E-2 is built that current stretch of highway on U.S. 95 is going to stay the way it is. So much for public safety. So much for showing compassion for the men and women and families that live along that stretch of highway. E-2, if E-2 is built, the same men, women, and children that are testifying here tonight that still have to travel to commute to their jobs, to the University, what about them? I'm an environmentalist. I care about you, too, but guess what? I don't think ITD cares about you. Palouse Prairie, we stand to lose a lot. It's our job as human beings to give	regarding the effects to wildlife and how wildlife collisions were considered in the Safety Analyses. See General Response Safety-4 regarding how speed limits affect safety. See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). As stated in the DEIS, none of the action alternatives would directly impact Paradise Ridge or Palouse Prairie remnants. Indirect effects are explained in General Response Wildlife and Weeds. The comment period was extended to March 25, 2013. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			voices for the voiceless. It's called ethics. It's called morals. It's called compassion. Palouse Prairie was here long before we were, ladies and gentlemen. It stands to lose a lot. Aesthetics. I care about beauty just like the next man, woman or child. You put a highway up on that ridge, big impact, noise pollution, light pollution, look up, big four-lane highway going across your mountain, not the same place. Natural history, that ridge is a part of the Palouse. The more Palouse we pave over, maybe we should consider changing the name of the region because there ain't much more Palouse left. Quality of life. I went to graduate school here. I've traveled all around the country. I've been here for seven, eight years and I'm proud to consider myself not only a resident of Idaho, but a resident of Moscow and Latah County. I want to stay here for a long time, it's because of places like Paradise Ridge that I want to stay here. Last, but not least, a lot of emotion, a lot of questions, a lot of anger. We need answers. There's one thing we can agree upon tonight, let's get, let's extend the public comment deadline. Another 30 days isn't enough. Let's get another 30, another 60, another 90. If Idaho Transportation Department took eight years to put out another DEIS why can't we have an extension for the public comment deadline? Thank you.	
OM-29	Heather	Stout	My name is Heather Stout. I live at 1090 Wolf Road, Moscow. I live just below the Thorncreek, what?	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response

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			Hearing Officer: Can you spell your last name? Testifier: Sure, S-t-o-u-t. I work in Lewiston, Idaho, so I have to go down to Lewiston every Monday through Friday. I appreciate the new road that was put in. It certainly made my life a lot easier; however, I live up here. I'm a Latah County resident and I come into Moscow a lot. I have several comments. I'm not going to tell you which one I appreciate the best of the three, but I do have some comments that I'd like everybody to think about. Number one, I had two children go to the University of Idaho. They're, go Vandals, they're Vandal graduates and they would come down to my house and they had friends that were from southern Idaho that weren't very good drivers up here. They weren't experienced and they lost friends on the Reisenauer Hill. I came up from my job tonight, drove all the way from Lewiston up here to listen, to give my testimony, and as I was coming up the Reisenauer Hill, or was coming down the Reisenauer Hill, it was raining. It was 34 degrees. I checked on my car, and it was that rain/snow mix and I thought hmmm, do I continue up, come up here, give my testimony, because when I go home, it will be a sheet of ice as you all know, so I'm going to have to climb very slowly up that road to get back home. Now, do I have a choice on those three? Yes and no. I also consider myself an environmentalist. I'm married to a farmer, by the way, but still an	Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Reisenauer Road and Zietler Road will both be improved with any of the alternatives; however, the E-2 Alternative would result in the greatest safety benefit. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3. The action alternatives include many design elements that will improve safety and capacity. See DEIS and FEIS Section 2.4.2. See General Responses Weather-3, Weather-4 for additional clarifications regarding elevation, ice and precipitation.

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			environmentalist. Do I care about the worm? Yeah, I do. Do I care about the wildlife [inaudible], or crossings? Yes, I do. Do I care about the prairie? Yes, I do. I care about all those things and I think I appreciate the people on the hill that actually sued to have the environmental protection, um, done for this and this study. I appreciate everything that you did. I wish ITD had done it eight or ten years ago, because it would have saved, I think, a whole lot of lives in the last ten years. I live on the western end and I went, and I spent a lot of time talking to, and I'm not going to get his name right, but the weather guy, I'm going to call him the weather guy. And I know from where we live, it is incredibly cold, incredibly icy, sometimes icier than on the upper elevations, so it really depends on where you live and what road you're going on. But if I, I, please, please, no matter what is chosen, Reisenauer Hill has to be fixed. People die on it all the time and Zee--, I'm not going to get it right, Zeitler or whatever that road is, what a mess. I'd never turn on that one. I'd be dead. These things need to be fixed, they really do, and, and Dr. Merickel, I so appreciate every comment you made, every single one. We are a community. We need to work together, and we need to improve what we have and make it safe. Thank you.	

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OM-30	Jack	Flack	Yes, I'm Jack Flack. I, uh, moved to, uh, Moscow in 1956, in the fall of 1956, to go to the University of Idaho. I graduated in civil engineering in 1961 and, uh, I've grown to really love this area. I now live in a house, uh, about two miles due west of, uh, Paradise Ridge. We are, our land is impacted by the western route. Uh, my wife Susan's family came to this area in 1877. They were the Snows and the Zeitlers who Zeitler Road is named after, which most people don't like to turn off of because of the hazard. Snow Road is the next one coming north and it is very dangerous, also. There's no question that, uh, we need a road that is safe and we need it soon, and the more we argue and get distressed and blame people and a lot of stall and want this, uh, process extended leads us on a very dangerous road. We would like to see this study completed. We would like to see the road start being built, and I would hope possibly that it would be built so that my wife and I can see it in our lifetime, because I think when they do that, it will be a great asset to the area. – Uh, I'm a firm believer in the fact that, uh, since I grow a large garden with Mr. Johnson who's, uh, he's left, but he came out many times and took pictures of my garden. Uh, fortunately, he usually did it in, when it was growing well, because in July or August I can get a frost that kills it where I live and that's in the summertime. In the summertime, the temperatures are much	See General Response OM-2.

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			colder down in the flat in front of our house than it is up higher on the ridge. The fact that the environmental study only included the year 2005, I'm disappointed in that, too, but I have lived here in this area for 54 years. I've watched the weather, and when it's bad where I am and bad on the 95, it's going to be bad on Paradise Ridge. And we talk about not wanting to destroy Paradise Ridge, but they all talk about going over Reisenauer grade with the road. Whenever they cross the road with the, Highway 95, they cross Paradise Ridge, because Paradise Ridge runs on the east side of me and swings around clear to the south side which is Bald Butte, and the, the, all of the wildlife that move from Paradise Ridge into Washington and across 95 now usually come in an area right around Reisenauer grade. They move onto Bald Butte and the majority of the elk are now not returning to Latah County. They're going down into the Snake River canyon and have moved from there down in, all, there are also some elk that have come down into Colfax and clear down to Hooper. They had one bull elk that spent the winter in McGregor's feedlot at Hooper that had migrated down there, so who knows where the livestock is going to go or the wildlife, but we love Paradise Ridge, but we also love the people that live out there and own the land and have paid taxes on it for a hundred, and however long they've had property taxes, and we would like to see some of	

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			the voices of those people heard as to which piece of property they would prefer that land goes on, because either, all three of the routes go through landowners that have property probably on at least two or three of the routes, and we would like to see those areas, uh, taken note of. We are all, most of the landowners, I can't say all, but the majority of them really like the E-2 route primarily because of the safety, the disruption to the lives of the people who have houses on the current Highway 95 and who will be dislocated or moved. We appreciate the people that live in trailer courts and that area of Eid Road that would say, hey, I would be willing to move my place to get a decent highway from Moscow to Lewiston, and the current road that they have from Thorncreek to the top of the Lewiston grade is well done, it's well engineered. The snow does not drift on that road badly. And, as I said before, when we get the wind in the Palouse and we get snow, it's going to be consistent throughout the Palouse, and one of the things that the protectors of, uh, Paradise Ridge, I respect their desire to keep it clean from weeds and other things, but there have been farm families here for a hundred years that have been protecting that environment, spraying weeds, keeping them down, and I wish that the City of Moscow, the City of Pullman, and some of those other areas would enforce their noxious weed laws to keep the seed from spreading out,	

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			but I can guarantee you if those weeds come into this area that the highway is not going to spread them any worse than a combine that goes through there and spreads chaff for 50 feet up in the air. That moves the weeds, also, and it will be a magnificent highway and for those of you that really love Moscow and the Paradise Ridge area, you should be saying isn't it great that anybody that comes from south to north or north to south can get on that road and see what a beautiful, magnificent area the Palouse is and they can see how well the farmers have preserved the Palouse and grown crops on it and it's a marvelous food-producing area. Thank you.	
OM-31	Donald	Arceneaux	Donald Arceneaux, A-r-c-e-n-e-a-u-x. I was 23 years old when I first drove on Highway 95. It was in the nighttime. I was coming from south Louisiana to go to graduate school at WSU and I hit the Lewiston grade and wow, did this flatlander have a shock. Um, I've heard a lot of what people have said. I agree with a lot of people. I agree especially with this gentleman here. Something smells to me. I live in Benewah County and the chip trucks run 95 all day and all night and the loggers run all day and all night and I think that, uh, the loggers and the chip truck drivers, uh, may be influencing this more than we think. You know, uh, we're talking about a short stretch of road. Yes, safety's important. I made some notes here. Um, the curves, the steep	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Regarding loggers and chippers influencing the ITD's Preferred Alternative or the decision making process, ITD and FHWA consider the effects to all users and all facets of the public and is not influenced by special interest groups. US-95 is used for local circulation and access, commuters and regional travelers. It is also the only north-south highway in the Idaho Panhandle and therefore must consider truck traffic as well as passenger vehicles and local circulation. Improving the existing road and reducing the speed limit are addressed in General Response Safety-4.

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			approaches and steep grades, those are all important. Safety is very important. The people who live on the road that will be impacted, that is a very big consideration. Um, I'm here to advocate why not just take the road as it exists and really improve it. We have a roadbed. You know, why can't we just take that road and take some of the curves out, take some of the, you know, we've got the technology to do whatever we want, we're humans. We can, we can, we can do this, you know. It might cost a little bit more money, but I'm speaking right now for the people who can't speak, the children and the grandchildren of the future. You know, if we mess up Paradise Ridge, if we go in there and disturb more closer to the ridge, it's gone. We can't replace it. We can replace a road every 50 years, every 20 years. We can continually work on that road and improve it as more money becomes available, but we can't make more native Palouse. What we have is what's left. The plants, the animals, the whole character of the place is what we have left, and yes, I understand that we as citizens can't control the development on Paradise Ridge. It's private property. We can hope that maybe the people who have those rock piles up there are sensitive enough to realize that they have something unique and want to protect it, but we can control the road. It's our public road. We can have a say-so in that, and so I think we should consider possibly just	General Response Displacement-1 offers clarification regarding residential and business impacts. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. There would be no direct effects to Paradise Ridge or Palouse remnants but there could be effects due to weed dispersal. Mitigation measures that are proposed to help minimize impacts to Paradise Ridge as a result of indirect effects like induced development and weed dispersal is described in FEIS Chapter 9, Environmental Commitments. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			improving what exists, maybe taking a little here and there, making a new, a new path for hundreds of yards, and, also, why don't we just decrease the speed for those six plus miles. Make it 50 miles an hour. If safety is an issue, if we slow down in this dangerous area, the chip truck drivers may lose 10 minutes on their way to Lewiston, you know, but we can maintain the Palouse environment as it exists today. That's about all I wanted to say right now. Thank you for your time and I hope that, uh, I, I agree that maybe some more time should be taken with this and, uh, we should really, uh, uh, study, uh, the alternatives and why, why this is taking place. I think these, uh, these truckers on 95 have, have more of a say than, than we think. And, um, thank you.	
OM-32	David	Hall	David Hall, H-a-l-l. Um, safety is a primary concern. Approximately 57 percent of crashes during the past 10 years occurred during inclement weather where the police reports list snow, rain or fog as the weather condition during the crash incident, page 116 of the DEIS. In the weather study they say that measurements began on January 1, 2005, and are ongoing, but, um, well, this report includes results from the date of measure between January 1, 2005, and May 31, 2005. If measurements are ongoing, where are the data for the remaining six or seven years, eight years? Why are they not included in this current draft? Some of the studies have been updated. That one apparently has not.	See General Response Weather-2, Weather-3 Weather-4, and Weather-5 regarding the sampling period and weather related road conditions, including snow, and rain. See General Response Safety-1 regarding frontage roads on the C-3 Alternative. Additional weather data has been collected. The link to the weather station data is no longer functional and the reference to the link has been corrected in the Revised Weather Analysis (Qualls 2014). The data that supports the report is now incorporated into the revised report. See General Response Safety -6 regarding the significance of differences in length and safety between alternatives.

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			The weather study goes on to say the ITD server pulled and downloaded data from the three stations approximately every five minutes. ITD uploads the data to its public website where current weather conditions may be viewed on the Internet. I just went there and the page is non-existent, so I think that data definitely needs to be part of the study. Um, why are they not there? In terms of safety, ITD predicted slightly more accidents for C-3 than E-2. That did not include the possibility of frontage roads and other small possibilities that very likely could switch those numbers around to make C-3, um, have fewer accidents than any of the others. This argument is specious. They hang their hat on that E-2 is the shortest route, but it's 9/100ths of a mile, less than 500 feet, shorter than C-3. That's ridiculous to go on that. Resource agencies are against the eastern alignment. Fish and Game, Idaho Fish and Game, is strongly against the eastern alignment. In a letter to ITD, they say in closing, we feel it is important to repeat one additional mitigation recommendation we have made in the wildlife assessment and at every other opportunity, we recommend avoidance of the eastern alignment. It has been IDFG's position from the start, a position supported by recommendations from the other resources agencies, that the eastern alternative will have the greatest direct and indirect impacts to wildlife and other resources.	See General Response Agency concerning the differences in opinion regarding ITD and FHWA's Preferred Alternative. See that FEIS Section 2.4.2 regarding the design elements for the action alternatives and for an explanation of the deficiencies they address.

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			Avoidance of impact is the primary mitigation tool available. We recommend avoidance of alternative alignment E-2, and the EPA guidelines include maximizing reuse of existing infrastructure which would indicate using the central alignment. They also state it will be important to use extraordinary sensitivity in the design and placement of the roadway to ensure that the natural values and functions of the area remain intact, one of the most critical aspects of the preservation of ecological connectivity. This can best be achieved using avoidance and minimization impacts. Why is ITD not listening to these folks? This is, after all, an environmental impact analysis and they're ignoring the environmental studies from what I can see. My final point was exactly what Mr. Arceneaux noticed, said, is that, is there a way to fix the existing alignment with a smaller footprint? I can't remember, Mr. Macdonald who also said that the lanes don't have to be so far apart and I think that would be the, the preferable option, but it's not included in this draft DEIS. Thank you.	
OM-33	Wayne	Olson	Good evening. My name is Wayne Olson, O-l-s-o-n. I see four minutes til the start. Okay, uh, every coin needs another side and I'm usually the other side of things. Um, my family and I have lived in the corridor for close to 30 years. It's always been a safety issue. I was there when the Lapwai school bus fell on its side on the Reisenauer Hill corner and slid down into the side. I was the one that called 9-1-1. I have thrown more flares in	The purpose and need of the project is to improve public safety and increase highway capacity on this section of US-95 which includes Reisenauer Hill as well. This will be improved with any of the action alternatives; however, the E-2 Alternative would have the greatest safety as described in General Response Safety-3. ITD recognizes that Paradise Ridge is privately owned property that continues to develop. In

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			the last number of years since that first part of the highway has been completed than ever before in that region. When this whole thing started, my kids were in grade school. My grandkids are now at risk. It's time to fix the road. E-2 is the best. C-3 is acceptable. I hear a lot of things about the environment and people are what's important. Safety is what's important. I don't get it, I really don't get it. As was pointed out earlier, we sit there at the bottom of Paradise Ridge and watch everybody build on the ridge. There's roads into each one of those homes. There's weeds along each side of those driveways. It does not make sense. What it boils down to in my viewpoint is the ridge. The folks up there do not want a highway in their front yard. But, back to the start. E-2 is preferred, C-3 acceptable. W-4 is sort of out in left field, but something needs to be done right now. Thank you.	response to public comments, additional detail regarding the commercial and private developments has been provided and additional details regarding the indirect and cumulative effects of the project and the past, present and reasonably foreseeable future development on the ridge is considered. See General Response Weeds. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
OM-34	Greg	Meyer	My name is Greg Meyer, G-r-e-g M-e-y-e-r. I'm a citizen of Moscow and I need a script. I tried to cut it down to four minutes. I have not reviewed a great deal of the DEIS, but as someone who has commuted nearly every week day on U.S. 95 between Moscow and Lewiston for 23 years and someone who has been a citizen of Moscow for nearly 30 years, I feel I can offer some relevant perspective. I feel strongly that ITD could immediately and at little cost address many safety issues on 95	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-4 regarding making smaller, low cost improvements including speed limit changes, signage, and passing zones. See General Response Weather-3 regarding ice, snow, and fog. See General Response Safety-2 regarding wildlife

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			between Moscow and Lewiston. We have been hearing and reading a lot in letters to the editor, in the DEIS, and so forth about safety concerns. I'm obviously as concerned as anyone about safety since I've spent thousands of hours driving this route. Safety on our highways is a paramount issue, so I ask these questions, keeping in mind that we are being told this is for the most part all about saving lives and we are putting our trust in ITD. Why was the speed limit going down to Lewiston hill on 95 raised from 55 to 60 when we know that higher speeds mean more serious collisions? We were told at least in media reports that it was because motorists were already driving at 60, so the speed limit was altered to reflect that. We were told years ago that this was also the rationale for increasing the overall speed limit on 95 from 55 to 60 between Lewiston and Moscow. Can you imagine if all traffic laws were determined by this criteria? Now to throw out turn signals and dimming your bright lights, right? Next question. Where are the passing zone and no passing zone signs on 95? They would be extremely helpful, especially for drivers not familiar with the road and also because some of the passing zones seem unsafe. Next, why is there no signage as motorists approach Reisenauer Hill warning them of the dangerous grade and curve? A simple flashing warning sign on the north and south end of the hill should have been in place decades ago.	collisions and how they were considered in the Safety Analyses. See General Response Agency regarding differences in opinions regarding FHWA's and ITD's Preferred Alternative. The comment period was extended to March 23, 2013.

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			Finally, more importantly, is the infamous northbound passing zone going down Reisenauer Hill. As you know, there's already a passing lane coming up the hill, which is dangerous enough, but this passing zone going down the hill, while someone who is reckless enough to make the decision to pass, cross over into the oncoming lane and attempt to complete the pass in a very short distance just before the road curves sharply to the east. I have actually seen a close call on the hill when a semi was trying to accomplish the maneuver. Can an ITD engineer please explain to me why this zone was created and, more importantly, why they haven't simply painted a no passing stripe on the road to eliminate this incredible danger? I've posed this question to several ITD officials tonight and they all said the same thing, good question. We're talking about lives here. I'm concerned that ITD picked the Paradise Ridge route and was committed to it from the beginning and that their DEIS reflects a bias towards E-2. I'm concerned that more motorists will die on the E-2 route because of more snow, more ice, more fog, and more wildlife on Paradise Ridge and, of course, more wildlife will die as well, and I'm concerned about environmental impacts. It is my understanding that I and other individual citizens are not alone when it comes to these concerns as has been pointed out. Fish and Game prefers the C-3 alternative, as does Fish	

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			and Wildlife and even the EPA which is why we're doing this, because of NEPA. After all, this is an environmental impact statement we are discussing today. I request that ITD extend the comment period for the DEIS and select an alternate route to E-2 for the sake of the environment and the safety of the public. Thank you.	
OM-35	John	Crock	My name is John Crock and I've lived in Moscow over 30 years now, and the trip down to Lewiston has always been a harrowing trip for the first few months. Hearing Officer: John, can you repeat your last name? Testifier: Crock, C-r-o-c-k. Um, I, it's unbelievable to me that IDT has taken so long to, uh, work on this road. I think that, uh, a reduction in speed limit is the obvious thing to do, but it hasn't happened. It's still 60 miles an hour through the bad section. I don't want to see this project stalled anymore. I do not like the E-2, um, alternative for several reasons. Environmental reasons is one, um, aesthetics as far as a four-lane highway cutting across Paradise Ridge. I walk up there a lot and it's beautiful up there. I wouldn't like to see a four-lane highway cutting across there. I do not believe it's the safest alternative because I believe IDT forgot to take an important thing into account, both with weather, but also with the E-2 alternative, the existing roadway would still exist, meaning it may have 10 percent	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Reducing speed would not lower the crash rate as explained in General Response Safety-4. General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, snow, rain, and fog. See General Response Wildlife and Safety-2 regarding the effects to wildlife and how wildlife collisions were considered in the Safety Analyses.

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			of the traffic on it, but I'll tell you, Moscow being a, a town of drunken college students at times, what can be more thrilling than take the old highway at full speed, and I still think there would be one or two deaths a year on that section of the road, because that road still exists in the E-2 alternative, so really, you need to add one or two more deaths a year to the E-2 alternative, because people are still going to drive that road, not at the rate that they do now, but if you own a car and you're 21 and you've had a few beers, let's take that road at 60 or 65, why not, and the central alternative eliminates that roadbed. There are no more existing deaths on that road, because that road is now straightened. So I think the IDT has not really carefully considered the total amount of deaths that's going to occur on the E-2, plus I live north of town, I look at Paradise Ridge every day when I drive to work. There is often a fog bank, um, especially in the wintertime, that wraps in a donut shape around that hill because it's the most uplifting, this orographic lift, just like Seattle has tremendous snow on the west side because the winds lift there, and that road is higher and it's going to be, its going to be wetter. It's going to be snowier. There's far more snow on Paradise Ridge right now than there is on Moscow Mountain or in the town of Moscow because it's higher, so I think I would like to see the road not even go over Reisenauer Hill. I think that would be safer, but I	

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			don't see that that's a possibility at this point, but I still think the C-2 is being lower, it's away from wildlife. It's, it eliminates the old roadbed because that's still going to be a problem. Thank you.	
OM-36	Brian	Funke	My name's, uh, Brian Funke, F-u-n-k-e. I just really have probably two questions is how do we address the existing 95 when E-2 is up there? I mean, we're saying all the entries and curves and Reisenauer Hill still poses a danger, that danger is always going to be there. Just like the gentleman previous to me said, uh, we still have that same problem. How are we addressing that? Is, did the department address that yet? Because we have that issue. I, I, that's my biggest concern. I have no interest, gains or, or anything, but I will probably still use the existing 95 to go to work and how are we addressing the curves and all the entries? I mean, that's a big issue. We need to address that and I mean, that needs to be looked at, and then I, I plow road on our driveway. Its, uh, we live on the south end of Paradise Ridge and, yeah, we're one of those guys that built on the hill, uh, but anyhow, uh, that's the way it is, but anyhow, I've got a driveway that goes, uh, north and south, so we get the dominant east and west winds and the, the hardest where I've seen the wind blow is right on Eid Road, and my question is, is when they build that overpass over Eid Road through the trailer court, what happens to the RV's going over that bridge and semi	General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95. General Response Maintenance-1 and Maintenance-2 also discuss how the existing US-95 loop would be maintained. US-95 would be upgraded to meet AASHTO standards which would include wider lanes, shoulders and a clear zone which would improve safety as described in the DEIS 2.4.2.

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			trucks, because I see a potential danger there. Anyhow, that's my two things.	
OM-37	Kristen	Lapaglia	Kristen Lapaglia, L-a-p-a-g-l-i-a, and I speak as a citizen of Moscow of 15 years. Um, I want to add a bit of big picture here about the Palouse. Um, today we naturally take great pride in the fact that national parks have been instituted in history at a time where few landscapes receive protection in the world. We in the Northwest and in Idaho take great pride to live in an area of the world with vast areas of native landscapes and wild plant ecosystems, called wilderness to hunt, to re-create or to just be. In the last 15 years that I've lived here, I've seen books and calendars published with vast public success showcasing the Palouse, the wheat fields, the remnants of old barns and also the native Palouse plants. Um, both our local universities are recruiting employees with our local wild landscapes, so in our community we clearly see value in our landscape Palouse and also economic value, and people familiar with the Apaloosa horse breed around the globe, not just here in Idaho or the nation, are familiar with the Palouse landscape as a unique landscape of native and agricultural land patches on rolling hills. As a biologist with some background in plant ecosystems and vegetation, it is obvious to me that a native plant ecosystem landscape such as the native Palouse will undoubtedly collapse over the new few decades if we allow weeds to	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Weeds discusses the alternatives' indirect effects to vegetation. General Response Wildlife discusses the alternatives' effects to the vegetation and wildlife on Paradise Ridge.

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			impact it in a major way, such as through road construction. The E-2 alignment proposal would do this major way since it brings our biggest local native Palouse patch into the zone of weed infestations, um, as stated in the technical report published by the Idaho Transportation Department, vegetation, page 16, um, I request that no future highway alignment does that, and I request that we as a community, um, protect the Palouse landscape as a nationally and internationally known core value of our community and that we think long term so that we can avoid contests between humans and environment in the future if we do a bit more strategic planning that way. Thank you.	
OM-38	Mark	Reindeau	My name is Mark Riendeau. That's R-i-e-n-d-e-a-u. Um, I know quite a few of you. I live in the corridor, also, and I have an interesting perspective. I own a wrecker business. I tow a lot of cars, a lot of cars off of Reisenauer Hill specifically, um, and to be quite frank with you, I'm actually quite ashamed of this fiasco that's been going on. I've lived in the corridor now for 11 years. Eleven years ago this was an issue. I don't think we've made much headway. It seems to me that we're putting praire grass which we've tried to plow under for years as farmers ahead of people's lives. Um, in 2006 in my driveway a lady was killed. It wasn't a drunk driver and it wasn't bad roads. It was a beautiful summer day. What	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. –

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			happened was a young man fell asleep. There was no grassy median or anything to protect the oncoming traffic. He crossed the center line and killed the lady, orphaned three children. Literally seconds before that my wife had turned into our driveway. If she had been 60 seconds later, it would have been her, and my, I would have to raise my kids without my wife, and, and that's sad, but the point is we keep dragging this out for several different things, and the bottom line is we need to move the highway. We need to do something. In my perspective, I see E-2 as the best route. C-3 is acceptable. I'm not sure why we're going west with a route, but we need to do something. People die, um, and I'm up here advocating we do something at the expense of my business, because I will lose business, I guarantee you. You know, that's, in the wintertime that's an extra 12 to 15 hundred dollars a month out of my pocket. That's the profit margin, and I will lose that, but it, it's not worth it for people's lives. It's not worth people being injured and, and we need to move that highway and we need to do something about it, and, uh, I say that I, I am truly ashamed of Moscow for hiding behind environmental things. I don't care what route we pick. Let's pick a route. Let's get it done. Let's start saving some lives. Thanks.	

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OM-39	Steve	Flint	I'm Steve Flint, F-l-i-n-t. One assumes that a document like the draft EIS is written to guide the decision-making process. In this case, it appears the decision was made long before the document was written with the assumption that producing a large volume of paperwork would be sufficient even if the collected data did not support the selected alternative. Recommendations from other agencies are ignored. If recommendations are given in the technical report that are not to IDOT's liking, another authority is hired to provide an additional opinion until an opinion favored, favorable to ITDOT's desires materializes. There are inconsistencies between different parts of the document. One cannot even get a consistent number of residences and businesses that will be displaced by a selected alternative. For example, the DEIS shows seven residences being eliminated by C-3, but in the screening of alternative documents, that's only three, so what to do? I suggest that the inconsistencies be corrected, the inadequate technical reports be fixed as much as possible. You've heard about the problems with the weather report, among other things. They measured wind, but it's not shown. I mean, uh, pretty, uh, fair assumption that wind is going to differ with the different alternatives and elevations, resulting in differences in drifting snow, so once these problems are resolved, I suggest that the alternatives be evaluated	NEPA requires that a range or reasonable alternatives be evaluated and that the environmental effects of the alternatives be evaluated and disclosed. FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. General Response Displacement-1 offers clarification regarding residential and business impacts. General Response Displacement-2 clarifies the differences in numbers of displacements in the DEIS. See General Response Weather-2 and Weather-8 regarding the data set and the validity of the Weather Analyses. See General Response Weather-3, Weather-4 and, Weather-5, Weather-6 and Weather-7 regarding other weather conditions including wind, in the study area. A Supplemental EIS is not warranted at this time as the findings from the Safety Analyses and Weather Analyses remain valid. The comment period was extended to March 25, 2013.

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			actually using the data that was collected, and perhaps the best mechanism to do this is to produce a supplemental EIS, and I hope you will agree to the request that people are making for an extension of the comment deadline, and I'll be submitting detailed comments in writing. Thank you.	
OM-40	Ray	Richmond	My name is Ray Richmond, R-i-c-h-m-o-n-d. Um, I live south of Moscow in the, um, the study area, uh, just south or just north of Snow Road. Jack Flack is one of my numbers, uh, neighbors. A number of other people in here are neighbors, also. Here's my comments, uh, that I want to make are, um, to identify some of the kinds of things that go on, on Highway 95 right now and how they potentially relate to what the different alternatives are there. Uh, this last year I lost the roof off of both my garage and my house. We are not more than 100 feet off of Highway 95, probably, what, a quarter of a mile south of, of Snow Road, the entrance there. What I want to make there is that, uh, we have this narrow corridor there. The elevations change somewhat, but what you see at the lowest elevations you also see at the highest elevations. I've watched fog roll from the top of Paradise Ridge all the way down, uh, to our drainage area. Uh, in that area down through there on the east side of, of the ridge there, there is a drainage area and it goes all the way down to the breaks of the, of the river, so the point being that, uh,	General Response Weather-3, Weather-4, Weather-5 and Weather-6 discuss the general weather patterns in the study area. Lowering speed limits is addressed in General Response Safety-4. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3.

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			you know, we talk a lot about the weather issues that are on there. Depending on the time of year, depending on the time of day, you're going to see the same conditions at each elevation, and so the point I want to make there is that there isn't a whole lot of difference when you look at the cumulative pattern of weather from, uh, for the entire season. The other point I want to make is that, uh, people have this tendency to think that that is a four-way freeway down through there. Um, my wife was almost rear ended a couple of weeks ago. Uh, she was turning into our place and across traffic and there was a white pickup that came down through there and she had her turn signal on, was tapping her brakes from the top of, uh, the hill where Barbers live, uh, as we were headed south, and, um, she the, the, she's the one that was in the car, I was at work, but anyway, the pickup didn't see her and she's got a big white Suburu and it was a black pavement, and uh, just beside the pull-off area where the mailbox, which is not longer there because we can't keep a mailbox up, therefore, we have to use a post office box, the pickup took that side at a very fast rate of speed, honking his horn all the way. Well, that's human nature in the sense that people tend to think, um, that they own the road and how dare somebody be turning in off of that particular road, so the point is that human nature is not going to change just, uh, because	

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			we put in a four-way highway. What we are going to see is, uh, that even if you reduce, uh, the speed limit on that road, people are still going to go down through there. Right now the speed limit on that road is 60 miles an hour in front of our place. We routinely have people go down through there at 70 and 75 mile an hour, and when I go to pull onto the road, I basically, uh, don't move until I can't see anything coming down the hill. Okay, I have 14 seconds, 13 now, so the point I want to make here is that that is a cow path. Putting a four-lane road down through a cow path with all its curves and everything else doesn't change the issue or the problem. I'm very much in favor of the E-2 alternative and I thank you.	

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Verbal Testimony from Public Hearing on January 23, 2013				
V-1	Ted	Allegri	My name is Ted Allegri. I live in Moscow. I've been been, uh, following this project for what 10 years, 9 years. Um, I'm concerned about, uh, using the C3 route. I don't think the W4 is feasible at all. The C3 presents a lot of problems in my view because of safety, if you have so many entrance and access points, you're just increasing the possibility of accidents ten fold. Um, E2, is it the E2 route, I think makes the most sense to me. I don't think that, um, is going to impact Paradise Ridge or the environment and if it is, it is probably very negligible. Um, I attended this group meeting for Paradise, uh, Ridge Coalition. I listened to a lot of their views. I think many of them are, uh, made up. I think they're exaggerated. Um, the concerns are not viable. Um, I think this community needs this road. It's, it will be a safe route. Uh, anybody that has driven the new section that you guys completed down by Genesee, it's a beautiful road, safe, perfect. Um, I will just, I put my support behind E2 and I, I think that would be good for everybody in this whole area.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. Public involvement is an integral part of this decision-making process. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis.
V-2	Jim	Miller	I'm Jim Miller, I'm the Area Manager for the Prime Land Cooperatives and we own property on the northern boundary of the proposed project, um, right along the current Highway 95 and I just want to come today to explain our position. Um, we do not have a preference on which route is eventually decided on, we just are encouraging	FHWA and ITD must balance the human and natural environmental impacts with the purpose and need, including safety. FHWA and ITD have identified the E-2 Alternative as their Preferred Alternative as explained in Alternative. See General Response Schedule for an explanation of the remaining environmental process, the

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			Idaho Department of Transportation to pick a route and proceed forward with the project and we are hoping that the public input will also concur with that. Um, uh, we, a couple reasons we want to support the project and moving forward, economic development and safety. The grain elevators which are a landmark on all the maps that ITD has put together are, um, a part of our main business. We ship, we ship millions of bushels of wheat out of Moscow and the surrounding communities as well so we have a lot of trucks on the road. We have 200 licensed vehicles as a company and so we're shipping a lot of products and we're very concerned about the safety of those truck drivers and the citizens that we're sharing the road with. And we are also concerned with the economic development because the lack of the project being completed has impeded our growth and expansion of our property on the south side of Moscow. We would like to expand our fuel site. There is a city street right of way through the middle of our property we would like to know what to do with, if we can finish it, what and how that effects the rest of our property so we would just like to know where it's going to be and move forward on that and on finishing the project. That's what I wanted to share today.	anticipated schedule and planning property improvements. The action alternatives would improve safety of the roadway for all users including trucks. ITD prepared a Mobility and Road User Cost Study Report that evaluates the economic benefits of the different alternatives. See the FEIS Section 4.10.
V-3	Neil	Marzolf	Yes. Neil Marzolf. I live at 3455 Highway 95 south, which is commonly called Reisenauer Hill. And, so my comments, in regards, uh, uh, to the relocation is that I'm, I'm pretty pro for E2. For	The NEPA process requires FHWA and ITD to consider and balance the human and natural environmental effects with the safety benefits to the public. Public involvement is an important part of

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			personal reasons, uh, number one I guess, is that the fact that the other two routes would take out my house, um, the house that we love living at so, uh, that would probably be the primary reason for us. But there's many factors that come in effect on that. Uh, over the past, uh, six years living at this house, we've had to open our house up many times, uh, at one or two or three o'clock in the morning, at 10 o'clock at night because of accidents that happen on the hill. Uh, four times we've pulled cars out of our yard, uh, twice we've had two vehicles that rolled over in our field, uh, that were injuries. We've also had to go up and assist for accidents on the hill every time there's, there's snow or icy conditions. Um, we have four young children and of course the concern is that, uh, the hill being where it is right now, why we're pro moving it to begin with is, uh, I've got a teenage boy that's going to be driving in about three years, I don't want him pulling out onto 95, and then, too, is I don't want anybody to come crash through my house in the middle of the night and injure any of my kids. So that brings us down to location and where we should go. I, uh, spent quite a bit of time reading the ITD, uh, environmental impact statement. Uh, from what I could, uh, ascertain from there, it's one of the best research projects I think I've had the, the privilege of reading. Everything's suggesting that E2 is going to be the safest, the shortest, the least expensive and the least disruptive alternative to go. Uh, currently, the opposition which is, uh, the	the NEPA process, involving agencies, landowners the general public. See Alternative regarding the considerations for identifying the Preferred Alternative. General Response Displacement-1 offers clarification regarding residential and business impacts since the DEIS was published. All of the alternatives would result in improvements to Reisenauer Hill. See General Response Safety-5. Snow and ice were also studied and considered as explained in General Responses Weather-3 and Weather-4. The Weather Analysis and Safety Analysis were revised to provide clarification and to consider additional data; however the relative comparisons described in the DEIS remain valid. See the FEIS Section 4.10 for updated information. Property ownership is not the only reason someone would have an interest in the project and area. We encourage all individuals to engage in the process. Visual quality was addressed in the DEIS and additional information regarding the visual effects of the alternatives has been added to the FEIS Section 4.11, Visual Effects. Additional mitigation measures have been added to FEIS Chapter 9, Environmental Commitments. There is a diversity of wildlife species that utilize Paradise Ridge. See General Response Wildlife-1 and the FEIS Section 3.8 and 4.8 for additional iinformation. See General Response Schedule regarding the next steps in the environmental process and the anticipated schedule.

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			Paradise Ridge Coalition, is, is made up of a lot of people that don't even belong in that coalition in my opinion cause they don't own any property. They have no vested interest in the direction that the route should go. Where, uh, 80 percent of us that have a vested interest in it have already reported to the ITD that we want the road to go on E2 and I think that that's, that's valuable. Now, if we look at the, the safety record of, uh, Reisenauer Hill or the, the E2, uh, progression, we've had in the past ten years and I gotta look at my notes here. In the past ten years, we've had, uh, do-do-do, sorry, uh, well let's look at the report. The report says that E2 is going to reduce the accident rate by 69 percent, uh, which I think's pretty powerful. That translates to four less deaths a year, 13 less severely dilapidating crashes and 150 less accidents over a ten year period. We've had, uh, I should have numbered these darn things. Okay, safety is really ultimately the main reason why IDT and why, uh we're even considering moving this road and why this is an issue. Three of the top thirteen most dangerous half-mile segments in all of Idaho, Idaho highways are found in the five miles that we're talking about. Considering Idaho's terrain and climate this is remarkable. The high accident rate are due to many private accesses, curves, hills, bad weather conditions and ever increasing traffic volume. Five fatalities and 18 severely dilapidating injury accidents have occurred since the current code, court imposed the de--, delay of the road	

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			project nearly ten years ago. Most of us will remember that, not too long ago, there was a young family lost on Reisenauer Hill and they're not included in these statistics. The preferred alternative, route E2, is the safest and is estimated to reduce accident rates by 69 percent, the most of any of the alternatives offered. That would translate into four less deaths, 13 less severely dilapidating crashes, 150 less accidents over the past 10 years. More of these tragic crashes are projected to occur in the future as traffic volume increases. E2 is clearly the safe, safest alternative of all that's offered. It's the straightest, the flattest, the shortest, the least expensive route with the fewer accesses and, and it will have the least poorer of the, of the weather conditions. E2 is the only route that eliminates Reisenauer Hill which minimizes curves and has minimum number of accesses and the most favorable for conversion to no access status for the generations that are behind us. I think that in our opinion, uh, my wife's and mine, and she'll be in here to talk later, I think that, that the major concern from what I'm seeing, is that people are concerned about the visual effect of a highway. Uh, who cares about the visual effect when we're talking about safety for those people that are driving it on a daily basis. The environmental mitigations required and proposed on route W4 have 29 mitigations that will be required, on route C3, 30 mitigations that are required, and on E2, 29 mitigations that are required. So in speaking	

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			about the environmental concerns and the mitigations involved in that, uh, all three routes are equal. Uh, W4, of course, offers, uh, more damage to the lower lands and is probably worse for the environment. I ride my horse throughout the whole Paradise Ridge area as well as the entire, um, uh, ten mile radius around Reisenauer Hill and I can tell you that I've seen all of the exact same species in my valley which is the valley right next to Reisenauer Hill as I have up in Paradise Creek. Uh, in fact, I've seen more. I've never seen a moose while riding through Paradise Creek and I've had to chase moose out of my yard at my house right next to Reisenauer Hill. So, my opinion is, that, uh, we should make the route E2 and if you don't own any property on that route, then stay out of that business, because it's really not yours. That's my opinion.	
V-4	Diane	Baumgart	My name is Diane Baumgart. I reside in the city of Moscow at 494 Ridge Road. Um, I am a supporter of the C through, uh, C3 alternative. I believe that we have the technology and the knowledge to make that route safe and it meets all the criterion of not using prime farm land, no environmental impact, um, that many of us are considered about. But in looking at all the three options, and coming from a construction, a commercial construction family, and a mortgage company family for 50 years, I was taught to ask this question "Qui bono? Who benefits?" It's often a consideration in construction projects and historically especially in government funded	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. See General Response Safety-3 and Safety-6. Regarding the project benefits, all action alternatives would benefit the traveling public by improving safety and capacity. All action alternatives would be designated as Expressway Access control, which

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			projects. So I looked at the landowners affected by each of the routes and it appeared to me that avoiding the W4 route and the C3 route gave an immense benefit to primarily two landowners whose land is currently west of our current Highway 95. Those landowners, according to Latah County Assessor's Office, are Mr. Germer of Palouse Developers, LLC and, uh, Sherman Clyde. They both have their land plotted out. Mr. Sherman has already plotted and developed one parcel of his farmland and with 95 vacated as a U.S. Highway and a count, and I was told it would then turn into a county road, both of those landowners who already have planned to develop their land have much cheaper access to their land, in terms of development. Mr. Germer for residential and Mr. Clyde's land is currently in development for residential development. Previously, Mr. Germer had tried to develop his land with the hopes of getting a road and a bridge off of Palouse River Drive but the Latah County and the Moscow city taxpayers said no to that two to five million dollar project so his land is currently landlocked and unavailable to be developed without some kind of access road. W4 divides his property, uh, in half which makes it much less valuable in terms of being split up, but also residential property development in a rural setting next to a large major highway isn't as development, as desirable for residential property. So I have serious questions about all the other alternatives. I strongly support	would purchase access rights and reduce development pressures. However, development is regulated by the land use regulations of the local jurisdictions. See General Response Access-1. Additional detail regarding indirect and cumulative effects has been added to Chapter 6, Indirect and Cumulative effects.

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			straightening C3 and making it set, making it safe, and I strongly hope that the development ties between the city, ITD and the various state organizations are not resulting in an undue influence in the steering away from C3 as a route for this highway. Thank you.	
V-5	Don	Meyer	Ok. My name is Don Meyer. Uh, I live here in Moscow and, uh, I've lived in this area just about my entire life. My family owns farmland on the other side of the ridge from where, from where the proposed E2 route is going to take place. But it doesn't really impact me personally from that, that area but, um, what I think I have a perspective, uh, because of, uh, working in the construction business for 21 years and a lot of that was laying out road beds and stuff and to me and as well as having owned a, a, a trucking company for 15 years, and to me, it makes the most sense to go with the E2 route because my experience, uh, driving through that area and, uh, working around there is that contrary to what some of the proponents against that route state, that it is gonna to be the safest, the most direct. Uh, in my opinion, there'll be the least amount of ice up there because in my experience driving through that area, uh, in the mornings if you get some kind of weather inversion, all of the ice and fog is in the lower spots, not up high on the ridge. And, uh, driving Highway 95 for many years, I've never, ever seen ice, even in the winter time, very seldom up on the high spots. That's where it melts first in the day time because of the sun and,	General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Your observations regarding elevation, fog and ice are consistent with the findings of the Weather Analyst. The weather, including elevation, ice and fog are clarified in General Responses Weather-3 and Weather-5. The Safety Analysis was revised and the E-2 Alternative would still have the greatest safety benefit. See General Response Safety-3. General Response Safety-6 describes the significance of the difference in length and cost between alternatives. Residential and business impacts were reviewed after the DEIS public hearing and are described in the General Response Displaceent-1.

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			uh, it doesn't usually come back, uh, with the different types of weather. It's, uh, gonna be in the shaded spots and the low spots so to me that's gonna to be the safest route, probably the most cost effective to build because it impacts fewer, uh, buildings and homes that are gonna have to be moved. It impacts fewer, uh, road crossings which makes the road bed, uh, more expensive to build. Um, you can cut costs because you're gonna have most of your onsite dirt you can use for fill. You don't have to haul it in and, uh, it just makes a lot of sense on a lot of levels, it's gonna be the safest route and, uh, I, I think, that that's what we gotta, we've lost too many people out there on that lower route, road and even if you straighten it out, I don't think that's going to change. You're still going to have, uh, uh, problems, you're gonna have accidents out there if they keep that low route because that's where the ice and, and fog build up is normally. Plus, you're gonna impact a lot more people, and, uh, destroy a lot more homes that way.	
V-6	Roy	Druffel	Hi, I'm Roy Druffel. I'm a representative of Norm, of Norm Druffel and Sons. We are based out of Pullman, Washington. Uh, we farm the Idaho/Washington border, uh, in the, over a, over a 30 mile period of, uh, land. We actually own land to the, on the west version of the new 95 road and we farm in all versions, uh, through, for White Snow and estates properties, Mary Posche, uh, we, and Gerald Snow properties, and Norm, Norm Druffel and Sons, Garrison, Verned Olsen	While the E-2 Alternative would impact the greatest acres of prime farmland, the farmland impacted by the Modified W-4 Alternative would be more productive. The Safety Analysis was revised and the findings remain valid. See FEIS Section 4.10 and the Revised Safety Analysis All right-of-way that will be required will be compensated for according to the Uniform Relocation Act. See the FEIS Appendix 5, Summary of

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			and we feel that, uh, the west route is, is taking, there's a lot better choices for farmland. We're farmers. The, the far east one, the one up on the Butte is by far taking the less amount, if, if you're a farmer, is taking for sure the least valuable farmland out there. Uh, uh, eeh, uh, we think, as we are truckers also, we think safety is a huge concern of this and we think it would be wonderful to keep the road at one level and head down to Moscow on it. The middle route, I can see the viability of the middle route. Uh, they're creating a few more up and downs, passes in that route. Uh, as we are trucker or traveler wise, these new, new things do go up and down better than they used to, but you are going to have to, uh, uh, uh, it, it's not going to be as safe as the top road. I think safety is a big key, I think that the property owners, the land up there is, is more marginal and at the, the final thing I want to say is that we went through a condemnation before, uh, from the government and taking farm ground from us and, uh, we know that the valuations of farm ground is, is to everybody's benefit to be low on it. There are comps right now and I will help everybody that I can talk to. There are comps right now going on at three to thiry-five hundred dollars an acre of farmland comps of good farm ground and medium farmground on it. We, we will give the land but we will fight for our rights. Thank you and, I, um, I do represent Norm Druffel and Sons.	Uniform Relocation Act for more detail.

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V-7	Steven	Barr	My name is, uh, Steven Barr. Um, I live at 204 E 8th Street in Moscow, Idaho. Uh, I have been a resident for off and on in Moscow for 59 years. I, uh, was both born and raised in Moscow and as a kid, uh, they had talked about, I guess, north-south route through Idaho and it's been talked about for many, many years. And, uh, uh, now it's, uh, we're getting to the point where, uh, we have routes selected and it just seems to me that it needs to be, uh, a decision needs to be made. And, uh, E2, uh can provide a safe, uh, highway. It needs to be, uh, completed and, uh, I guess one of the things that I'm concerned about is just creating a safe highway. Uh, six or seven years ago, I slipped on, uh, on March 9th, I, uh, slipped on, there was some black ice, and, uh, slipped and broke two vertebraes. So I have had, I wouldn't want to wish this on anybody. I've had two, uh, seven and a half hour surgeries and I'm not quite the same as I was and I think it, it's part of living on the Palouse is dealing with ice and snow but we need to really, um, uh, provide a safe and efficient, uh, roadway to, uh, for commuter traffic and, uh, and I'm thinking that the E2 is the most, the best choice. And I think it would benefit the whole community. That's, uh, my thought, and, uh, and why not make it a win, win situation for everyone. And, uh, mitigate and find some additional east prairie land and, and maybe it could be even something, uh, really positive by, uh, you know, put a positive spin on it and, uh, create, uh, some signage that, you know, for	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule regarding the environmental process and the next steps. General Response Weather-4 and Weather-5 discuss ice and snow respectively. See the FEIS Chapter 9, Environmental Commitments for additional mitigation measures that have been incorporated into the E-2 Alternative since the DEIS was published. This The Safety Analysis was revised and remains valid. See the FEIS Section 4.10 for a summary of the findings. Access and mobility were further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study Report (ITD 2014a). Mitigation will not include purchasing prairie, but does include signage as discussed in the FEIS Chapter 9, Environmental Commitments. The Safety Analysis was revised however the findings remain valid as described in the FEIS 4.10 and the Revised Safety Analysis.

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			educational purposes, for east prairie folks. And, uh, you know this could be a really good, uh, thing for, for Moscow and that's why I, I really support the E2 alternative. It could really, uh, give uh, help business, uh, and, just be a real positive thing for, for uh, for Moscow I guess. For one of the good things about the E2, uh, in some of the documentation that I've read is that the E2 would result in the greatest travel time reduction, shorten travel time would be a good thing, the vitality of the area, can benefit great transport, emergency service response, school access, bicyclists, pedestrians in the whole area. The C3 alternative would have the highest predicted fatal injury and total crashes of all the actual alternatives. The C3 alternative would be the least safe because the extra intersections, approaches and suburban section would create turning traffic across U.S. 95. The E2 alternative would have the shortest [word inaudible] and the fewest public road intersections, the fewest commercial and residential approaches, would have better weather conditions for roadway safety, compared to W4. E2 would also have the greatest length of four-lane divided highway. These factors all contribute to E2 having the lowest predicted crash rate compared to other alternatives. The E2 alternative is predicted to reduce the crash rate of the existing road by about 69 percent.	
V-8	John Hidden Village	Thomas	My name is John Thomas. Uh, we are the owners of Hidden Village Mobile Home Court, uh, south of Moscow there, adjacent to Highway 95, and,	General Response Displacement-1 offers clarification of residential and business impacts. Wells will be shown in plan sheets and stormwater

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	Mobile Home Court		and, uh, my comments are related to, uh, E2 route and the possible impacts of the, the route is to the east of, of most of our property and I guess that the impacts would be, uh, associated with the environmental side with the mobile home court and the 32 homes and the two wells there, uh, related to quality of life, the possible impact to those, um, wells that are certified through DEQ, actually there's three wells there. And our water quality, uh, from the run off in the salt brine solutions. Some of those, uh, issues related to run off with the highway being to the east and, and down sloped, uh, also there. I guess the second thing would be just the quality of life from impact from noise from the overpass, um, and, uh, um, what impact that would be. The third thing would be access for the residents that have immediate access to I-90, or excuse me, to 95, uh, north and south. Some of our residents do work in Lewiston and, and, and some, uh, work in Moscow, so the access issue is a concern, also. And, um, I think the final thing, is is my experience with the weather there, that, uh, I think that two things that are kind of being missed here is that the weather, uh, at, at that level, it, it, it does have a dramatic change where E2 is and even though it's a straighter road and a faster road, you combine that with the weather, you could have increased accidents. Uh, it just kind of appears to me that, uh, that if, if, uh, this most direct route might be the fastest, but I, I think there are some issues here to be looked at. I think, I don't think	flows and treatment areas will be designed so that wells are not contaminated. If wells are affected they would be relocated or decommissioned according to IDWR regulations. The quality of life considerations including visual and noise impacts are described in the DEIS 4.11 and 4.12 respectively and will be considered during the design process as practicable. Vegetation removal will be minimized where practicable. See DEIS and FEIS Section 4.11 Visual Effects. While travel times for residents on Eid Road are not anticipated to change, access safety on or off of US-95 would be greatly improved. General Response Access-1 describes the future access for the roadway. See General Response Weather-4, regarding elevation and weather related road conditions. Mitigation for impacts to residents will be determined according to the Uniform Relocation Act if right-of-way is required. Mitigation is described in the FEIS Chapter 9, Environmental Commitments.

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			they're unsolvable, but there's mitigation, some discussion that I'd like to have further with those, with those issues to our property, and those residents there and, uh, because it is, is a capital investment for Christy and I, uh, there also. Um, I can't think of anything. I'll, I'll write, I'll, Christy and I will, uh, put a comment sheet together and send it in. So, I appreciate your time. Thank you	
V-9	Jack	Flack	I'm Jack Flack. I'm a local farmer, south of Moscow, work for Snow Farms Incorporated. I came to the University of Idaho in 1956 and graduated in Civil Engineering in 1961. At that time, I went to work for the Snow family, farming south of Moscow. I've been involved with the Snow property south of Moscow for about 54 years now. My wife's family has been involved there for about 136 years so it is an area that we are very familiar with and pretty fond of and we think it is very important that the Idaho Transportation Department knows that we are very happy with the way that they have gone about the environmental study. We are hoping that they can go ahead and get this plan okayed and continue on and get us into a very safe highway soon. Our prime concern is the safety of the highway and getting it built soon. Those are primary concerns for us. We also are concerned about the safety of the different routes. We think, uh, our natural, uh, preference is the E2 route, the farthest east route. We think that would be the safest route. We think it would, uh, disrupt the people involved that own the land in that area	See General Response Schedule regarding the environmental process and next steps. The Safety Analysis was revised and the findings remain valid as described in the FEIS Section 4.10 and the Revised Safety Analysis. The residential and business impacts of the alternatives were reviewed following the DEIS hearing as described in Displacement-1. Regarding the weather conditions on Paradise Ridge, your observations regarding temperature and fog are generally consistent with the findings of the Weather Analyst. See General Response Weather-3 and Weather-5 regarding elevation, temperature, and fog. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. The potential for wildlife collisions have been accounted for in the Safety Analyses. The Safety Analysis was revised but the findings, including those regarding wildlife collisions remain valid. See General Response Safety-2, the FEIS 4.10 and the Revised Safety. Analysis. See the DEIS and FEIS Section 4.11 Visual Effects for

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			the least of any of the routes. We think it probably would be, uh, in terms of the environment, probably, uh, disrupt less of the native Palouse prairie and the good Palouse soil that we farm down in the lower flats and, uh, the area that we are involved with. We're also concerned that, uh, the coalition to save Paradise Ridge is, uh, keeps missing the fact that, uh, they're very concerned that people in Moscow feel that the, uh, weather conditions are different up on the ridge than they are on the other two routes and I would like to say that in our 54 years of living in this area that we've observed that, uh, the western route would be the coldest route. The current location of the highway 95 is, uh, not quite as cold, but a little colder, uh, a little warmer and the eastern route would be the warmest route because of the increased elevation. You, we've observed from our kitchen dining room that we eat dinner, breakfast, and all of our meals at as we look right out directly at, uh, Paradise Ridge that usually the fog level, when they do have fog on Paradise Ridge, it, uh, is usually somewhere above 3,000 feet elevation and it may drop down to, uh, the twenty-eight, twenty-nine hundred level but when it does, we usually have fog in the whole area. The snow line is similar to that. The snow line usually is about twenty-eight hundred to twenty-nine hundred feet and sometimes up to 3,000 and I think that that would not be any problem in terms of the safety for the E2 route. We, uh, also like that	additional information on visual effects of the alternatives. See General Response Safety-2 regarding wildlife collisions.

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			route because of the grade that they have on it. The highest elevation being at Reisenauer Ridge which, uh, people that are wanting to preserve Paradise Ridge or, don't mention the fact that the highway does go across it right now and that all three of the routes that are proposed and the current route goes over Paradise Ridge at Reisenauer Hill and, uh, we think that, uh, that grade from there going into Moscow would be a very, uh, safe grade going in and it would not have much elevation change going along the top below the tree line and on Paradise Ridge until it drops down into Moscow and that would be a very good grade and it would probably be the only significant grade coming out of Moscow. We think that would be, in terms of the safety of the route, that would be very beneficial for the people in Moscow to, uh, have that route. One of the things that, uh, we feel is, uh, as someone that is very fond of Paradise Ridge, is that, uh, people that are concerned about having a highway up there, uh, a safe highway, from my perspective, would be far superior to what we've been having in the past and the other routes, plus the fact that, uh, in terms of coming into Moscow, it'd be one of the most beautiful scenic highways in Idaho, it'd give people uh, a better view of the Palouse than any of the other routes. And, uh, in terms of the wildlife that's up, up there, we have considerable, uh, death of wildlife, particularly deer on Highway 95, which is similar to the, the central route and I feel that the amount of, uh,	

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			wildlife that will be impacted by the highway on E2 will not be significantly different than what we have already with Highway 95 and the other two routes so I don't have a concern about that. I do know that the visibility, uh, up on E2 will be, uh, very good and when we get four lane highway with, uh, a wide right of way, we'll give hopefully the drivers that are driving there, uh, a more visual, uh, significance of the surrounding area and they will be able to spot those, uh, animals before they get on the highway and take precautions not to hit them. Uh, and I would also say that, um, we are concerned that this process be, uh, terminated as quickly as possible by the Highway Department and they can get started on construction and we definitely want the E2 route. Thank you.	
V-10	Susan	Snow-Flack	My name is Susan Snow-Flack. I'm Jack Flack's wife, the one who just spoke previously on the tape and, uh, I would like to say, in order to save time, I'll say that I agree with everything that he said but I would like to add my comments to that. And, um, we live on Snow Road. And, um, my family came here, the Snow family came here, 136 years ago and homesteaded this area and have a vested interest in seeing that it is, uh, preserved and that it is well taken care of as well as the Clyde family who came on the same wagon train with my folks back in the, in the 1800s. We really love that area and would like to see it, uh, uh, taken care of. Um, and, uh, certainly, the Clyde family, has made continual efforts up in the	See response V-9 for responses to the comments that you agree with. FHWA and ITD must consider all substantive public comments on the DEIS and will continue to work with affected landowners and the general public through the design process. See General Responses NEPA and Schedule. The Safety Analysis was revised but the findings remain valid as summarized in the FEIS 4.10 and described in the Revised Safety Analysis. Noise for each of the action alternatives would be similar because there are similar predicted traffic volumes, however, the differing locations would bring noise closer to different homes or businesses as described in the DEIS and FEIS 4.12.

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			area on the E2 route, which is definitely our preference, uh, to preserve that area and they should be commended for that. And I also would like to commend IDT for the job they have done, um, in putting all this together and the immense amount of work that has gone into the environmental studies and the effort to make this a safer place for, for future generations. And my family has been here for five generations and we're, we are very concerned about the safety because this road as it is, is, uh, very dangerous and as proven by the facts given by the ITD, it is definitely in need of, um, improving, and we would like to see that done as soon as possible, um, so that, um, the safety features of it can be kicked in. Um, Some of my additional comments involve the fact that I think the opinions of the people that are directly involved by owning or living on the property involved, uh, should be given more impact than those who don't own property or deal with it on a daily basis and, and some who, um, just like to be involved. I feel like, um, these people have owned the land for all these years and their opinions should be, uh, heavily weighted. Um, safety wise, I feel very strongly that the human life is more important than the bugs and plants that are being, um, concerned about in this study. I also think in terms of the noise, um, they say that the E2 route is, would be more noisy, um, but on the other hand, if they choose the E2 route, um, less people would be close to the highway because that route	

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			does not go as close to as many homes. Um, as you may have heard previously, my maiden name is Snow and, um, our family homesteaded in the area which is probably the central part of the study that, uh, we've just been hearing about. So I would say that we, we definitely have a vested interest and I would say again that, uh, I appreciate IDT and that we strongly approve the E2 route. Thank you very much for taking our comments.	
V-11	Sandy	Blair	Hi, I'm Sandy Blair. And, um, thank you for giving us the opportunity and showing us all these, um, studies you have done. I'd like to say after looking at everything that I think, if we have alternatives that are good alternatives, we should not disturb people, their businesses, and the safety so, um, the one that I would eliminate, absolutely, is C3 because of the safety issue and how many lives would be impacted as far as businesses, buildings and homes. Um, between the W4 and the E2. Um, they both seem viable to me. I talked with the wetlands and she says it would not be that huge of an impact on them. I guess my favorite would be the west 4 but I'm also happy with E2 because of the safety issue there.	General Response Displacement-1 offers clarification of residential and business impacts. The Safety Analysis was revised but the findings remain valid as summarized in the FEIS 4.10 and described in the Revised Safety Analysis. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.
V-12	Bill	Nash	My name is Bill Nash. I'm a resident of Moscow, Idaho. Uh, we recently moved to Moscow from Genesee and have been driving this highway one to two times a day for the past 15 years. Over those years, I've seen multiple slide offs, crashes, fatalities. Uh, I'm glad that the Idaho Department of Transportation is finally taking some steps to	As stated in the DEIS, the alternatives would improve the road, improving safety over existing conditions, including at Reisenauer Hill. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis.

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			get this done. I know that there have been some roadblocks along the way. Uh, but it's certainly something that has to be done for public safety. Uh, if there's any route, I think, that would be preferable, would be the, uh, what is called? The E3, E2 route? Hearing officer: E2, uh huh. Testifier: The eastern route, uh, simply that it takes Reisenauer Hill out of the way completely, uh, offers less of a grade and is a straighter route than the others. Uh, I think that, uh, that might be, uh, the more economical routes and I think it's probably one of the safer routes. Thank you.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
V-13	Gail	Byers	My name is Gail Byers. I'm a resident at 1116 Pinecrest Road, Moscow, Idaho. I truly believe that the highway needs to be completed at this time. Um, the 2E route seems to be the safest and the most logical and it's been well researched and I think the time to go ahead and build Highway 95 is now, not 10 years from now so, um, my comment is this, let's please proceed. Thank you.	General Response Alternative -1 explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
V-14	Norm	Metzker	Ok. My name is Norm Metzker. I have been a resident of Latah County now just over 50 years. I believe it's been at least 45 years since I realized there needs to be an improvement. Um, I am very much in favor of either west or central. I don't like the idea of this east, eastern route. Um, I do know it needs to be done, the sooner the better, because it costs so more the longer you wait. So I think this is probably the bulk of my concern and I think it should be taken seriously. Thank you.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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V-15	Steven	Redinger	I am Steven Redinger. We own property in the study area along Jack Shaw Road. Uh, E3, is it E3 or E2? Hearing officer: It's E2. Testifier: E2 is by far the best route, looks like the safest route. Uh, I've lived in the area for 30 some years that I lived in that area and, uh, am highly in favor of E2. Thank you.	General Response Alternative -1 explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis.
V-16	Buddy	Henson	Ok. My name is Buddy Henson and I'm a retired state employee. And I am in favor of the E2 route. Uh, it's a little shorter. I feel it is a little safer and the alignment is very good. So, the less impact on property owners and it's a better route because of the weather situation so that's the one that I am in favor of. Thank you	General Response Alternative -1 explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See FEIS Section 4.10 and the Revised Safety Analysis. General Response Displacement-1 offers clarification of residential and business impacts. The Weather Analysis was revised and supplemental information was added but the findings remain the same. See the General Responses for Weather.
V-17	Alison	Tompkins	This is Alison Tompkins. Um, my comments on this project are, um, I guess, I, I've lived in this area my whole life and I've been commuting this route for 12 years and, um, the main thing I would like to get across is that I support this project and something being done. I see the three alternatives and I'm not, uh, partial to either one in particular. Um, I guess, I would support something that, uh, results in, in the safest route with the least amount of impact to environmental issues and that's, that's pretty much it. I guess, uh, oh, actually, there's one other thing. Um, Reisenauer	General Response Schedule describes the environmental process and next steps. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. All of the action alternatives would improve Reisenauer Hill over existing conditions, but the C-3 Alternative would still have the two curves north of

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			Hill, in my experience is one of the nastiest spots and I guess that one option, it still kinda takes it down Reisenauer Hill and with the, with the northern exposure and the two curves, and as steep as it is, that, um, that is just really a bad spot so I guess, um, I actually would be in favor of one of the other two routes that, that improves that area. So, that's all.	Reisenauer Hill. See General Response Safety-5 regarding safety improvements on Reisenauer Hill.

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Comment Letters (Received between January 4, 2013 and March 25, 2013)				
L-1	Steven M.	Watson	I support the E2 alignment from Thorn Creek to Moscow for the following reasons: It will have the least impact to residential and business properties, affecting no homes or businesses as other alignments do; It will cause minimal disruption to adjacent properties, although some homes on Paradise Ridge could potentially see portions of the alignment; Minimal noise disruption to adjacent properties; It is safer by far than the current alignment; the Central and Western alignments are longer and more expensive and will force homeowners and business owners out of their properties. Thank you. Steven M Watson PO Box 61, Uniontown WA 99179 509-336-1936 Stevenwatson4@gmail.com	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Displacement-1 offers clarification of residential and business impacts.
L-2	Selma	Yocum	**Commentary Concerning Highway 95 Re-route between Thorncreek Road and Moscow, Idaho Submitted to the Idaho Transportation**	See General Response Weather-2 regarding the five-month data-sampling period. Weather patterns near Paradise Ridge are discussed in

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			Department Public Hearing, January 23, 2013 – Submitted by Selma Yocom, 530 N. Adams St., Moscow, ID 83843 **Comments** The Idaho Transportation Department's 6.5-mile, preferred alternative re-route of Highway 95 --the eastern route or E2 -- between Thorncreek Road and Moscow, is not the route I prefer. The E2 re-route, as described in the Draft Environmental Impact Statement, has several glaring flaws. For example, the weather information for the E2 alternative is limited to the period from January-May, 2005. This is too brief of a winter review, and limiting the study to 4 months in 2005 captures no more than one mild winter season. What happened to the winter weather data from 2000-2004 and from 2006-2012? Since highway safety is one of the primary reasons given for the E2 alternative, why weren't weather patterns, up on Paradise Ridge, such as, snow depth, black ice formation potential, frost pockets, fog and other visibility concerns, reviewed? Or, if these weather conditions from the other years were taken into consideration, why weren't they included in the DEIS? Anyone who has lived in north Idaho for a few winters can tell you that road conditions at higher elevations, such as those encountered on Paradise Ridge, are more hazardous and last longer than those at lower elevations. Weather conditions along Paradise Ridge are unpredictable and have the real possibility of contributing to more highway injuries and fatalities than the existing Highway 95 route.	General Response Weather-3, Weather-4 and Weather-5. The action alternatives would not go over Paradise Ridge but would be located along its base. None of the action alternatives would directly affect any Palouse remnants, rare or native plants. Indirect effect to Palouse remnants and restoration projects are explained in General Responses Weeds and Wildlife. General Response Displacement-1 offers clarification of residential and business impacts. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. – –

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			Another conspicuous omission in the DEIS is the disregard for the disruption and potential annihilation of rare, native Idaho plant and animal species. Various environmental organizations, foundations, public institutions, and individuals are working to save the few remaining remnants of Palouse prairie habitat – the landscape indigenous people and pioneers lived in and loved. Why does the ITD want to or have to pave over this part of Paradise Ridge? Why does the ITD want to unleash an infestation of noxious weeds that would spread 0.6 miles through a piece of prairie paradise on either side of the proposed (E2) new section of highway? The answer is: The ITD does not have to choose the E2 alternative. A more central route, also identified by the ITD, is located away from the native prairie and more extreme weather conditions on Paradise Ridge. The C3 alternative route exists. The proposed C3 alternative is lower in elevation and stays away from the frost pockets and slippery road hazards that drivers would have to negotiate higher up on the ridge. The C3 route is safer and less environmentally destructive than the E2 alternative. The question of the day is: Will the ITD "do the right thing" and choose the C3 route and get on with the task of building a safer 6.5-mile stretch of highway between Thorncreek Road and Moscow? The C3 re-route will save more lives, help prevent injuries, spare the native prairie parcels, cost about the same as E2, and will impact about the same number of private and commercial landholders as the E2	

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			alternative. The C3 re-route is clearly the right choice for a safer, economical, and less environmentally destructive gateway form Highway 95 into the City of Moscow.	
L-3	Norbert and Janelle	Niehenke	3125 Highway 95 South Moscow, Idaho 83843 Phone: 208 883 9686 January 23, 2013 – To: Public Hearing Officer Re: US 95 Thorncreek to Moscow We support the FHWA's and ITD's preferred Eastern alternative (E-2) route for the new alignment of Highway 95. Since we have lived along the existing highway we have seen far too many emergency vehicles respond to accidents so are anxious to support the safest route. We have driven Highway 95 all of our lives and know that you must be prepared to drive in snow, ice and fog in the wintertime no matter where the new highway is located. In recent trips to Lewiston we have encountered a snowstorm in the Genesee area and another time ice where the old Highway 95 intersects to Reisenauer Hill when the rest of the roadway was bare and dry. Wildlife will also be an issue no matter which alternative is chosen. We've hit a deer on Reisenauer Hill and straddled a carcass killed near Eid Road and have observed numerous road kills through the years. We have seen herds of deer and moose in our own backyard. E-2 Alternative will displace the fewest number of homes and businesses and therefore disrupt the	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. See General Response Weather-3, Weather-4 and Weather-5 regarding ice, snow and fog. See General Response Wildlife and Safety-2 regarding the effects to wildlife and how wildlife collisions were considered in the Safety Analyses. General Response Displacement-1 offers clarification of residential and business impacts. All displaced and affected landowners and residents will be treated equitably under the Uniform Relocation Act regardless of whether they are mobile home.

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			fewest peoples lives. Mobile homes can be moved more easily than permanent residences. To displace eight businesses with the livelihood and jobs they provide would seem foolhardy in this economic climate. We've been farmers all of our lives and know that (W-4) the Western alternative would destroy the most productive farmland in Latah County and (C-3) would take the best farmland out of the Clyde Farm. Again we think the economic impact the highway realignment will have on the people affected must have top consideration. The Environmental Impact Study you have prepared for us is a remarkable in-depth study of the alternatives and we thank you. We agree with your determination that E2 will be the shortest, straightest and (with fewer access points) the safest with the least impact to those of us who live here. After the Feb 23rd deadline for public comment we urge you to prepare the Final EIS mitigating the areas of concern for the Eastern route and get on with building the road we've all been waiting for. Respectfully submitted, Norbert Niehenke Janelle Niehenke	
L-4	Jim Greater Moscow Alliance	Anderson	IDT Jan 23, 2013 Jim Anderson Vice President Greater Moscow Alliance The Greater Moscow Alliance (GMA) is a 300-plus group of business People, community leaders and concerned citizens who support free-market enterprise, private property rights, and limited government.	General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			The GMA has long supported the Highway 95 improvement project between Lewiston and Moscow and we commend the Idaho Transportation Department for its thoughtful work in providing a plan that will be safer for all of us, increase mobility for all of us and improve economic opportunities for all of us. We believe it is time to put that plan into action and move forward without any further delay. If ten years of studying the different routes Says the Eastern "E2" is the way to go ... then lets go on with it. We can all appreciate the various concerns individual may have against one route or another, but it's time to put the interests of the greater Moscow area ahead individual interests and make Moscow a greater place to live, work and do business.	
L-5	Stephan	Flint	January 22, 2013 One assumes that a document like the DEIS is written to guide the decision-making process. In this case it appears the decision was made long before the document was written with the assumption that producing a large volume of paperwork would be sufficient, even if the collected data did not support the selected alternative. Recommendations from other agencies are ignored. If recommendations given in a technical report are not to IDOT's liking, another "authority" is hired to provide an additional opinion, until an opinion favorable to IDT's desires materializes. There are inconsistencies between different parts of the	The DEIS is required under NEPA and is both a tool for decision makers and a disclosure document of the environmental impacts of the alternatives evaluated. FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS

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			document- one cannot even get a consistent number of the residences and businesses that will be displaced by a selected alternative (e.g., C3 eliminates 7 residences in Table 8 of the DEIS but only 3 in the Screening of Alternatives document (p. 17). What to do? I suggest the inconsistencies be corrected, inadequate technical reports (e.g., weather) be remedied. For example, p. 3 of the weather document states the measurements are ongoing. Where are the data for other, more representative, years? Where are the wind data? It's common knowledge the ridge is windy and likely the three alternatives differ in wind and the resulting drifting snow. Once these problems are resolved, I suggest a reevaluation of the different alternatives be conducted using the data. This may be best done in a supplemental EIS. I will submit detailed comments later- I hope you will agree to an extension of the comment deadline, which I expect someone to request soon, if they haven't already. Stephan Flint 4961 Lenville Rd, Moscow ID 83843	development. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. An alternative will not be selected until all of the substantive public comments have been considered and addressed. See General Response NEPA and Schedule. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. See the FEIS Chapter 1 and Section 3.8 regarding why multiple wildlife reports were prepared. See General Comment Response Displacement-1 and Displacent-2 for an explanation of the different displacement numbers in the DEIS. See General Response Weather-2 regarding the 5-month data set and Weather-3, Weather-4 Weather-5 and Weather-6 regarding weather patterns and weather related driving conditions including wind and snow drifts. The E-2 Alignment does not go over Paradise Ridge but is located along its base. A revised weather report has been completed since the DEIS that helps clarify the original weather report and incorporates data collected after the original report was completed (Qualls, 2014). The public comment period was extended to March 25, 2013.

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L-6	Robert E.	Clyde	The eastern route (E2) starts at Thorncreek, crosses a corner of Gerald Reisenauer's field and comes on to Clyde property. The route goes east of the cell tower, through a field that is farmland in CRP. E2 then proceeds north 1/2 mile to a small trailer court on Eid Road. It will take out a storage shed that is owned by an absentee owner. One well and six trailer spots will be affected. Three of the six trailer spots are rental units. The owners of the two double wide units want them to be moved to new locations. The route then crosses Eid Road with a bypass. One house will be removed and one well (the house has sold three times in the last 10 years and the state had a lawsuit against it by the previous owner.) After crossing Eid Road the route goes on to a piece of farmland owned by a lawyer in Denver who has indicated a desire to sell. The route continues north and crosses a small patch of timber, which was planted by the CCC Boys in 1934. Next the route comes back onto Clyde property. It is on farm land all the way except for the two ditches that run a little water in the early spring and are dry by the first of July. The highway would be at the base of Paradise Ridge 100 yards below any Palouse Prairie native grasses. Most of the native grasses are seeded on Clyde's former farm land in a restoration program with Fish and Game Department. Because unless we take care of the Palouse native grasses, Ventenada and Tuber Oat Grass will take over. After leaving the Clyde property the route goes on to Mike Snow's farm for 3/4 of a mile north , then on to the Cameron land	The potential impacts to residences and businesses have been clarified in General Response Displacement-1. Should an action alternative be selected, ITD will work closely with landowners during the right-of-way and design processes. As stated, the E-2 Alternative would not be located on Paradise Ridge but would be along its base. Additional information regarding potential indirect and cumulative effects to Palouse remnants, Paradise Ridge and restoration projects has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. See General Response Weeds. See General Response Weather-3 regarding frost.

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			which is being sold for houses. The route then crosses a comer of Ray Jensen's farm and back on to Clyde property proceeding northwest to join Highway 95 at the Primeland Grain tanks. E2 is the shortest route, can be built without disrupting current traffic, takes the least prime farmland out of production, and has the fewest people (seven) directly impacted. As for the people who fear Paradise Ridge will be paved, E2 does not impact the area nearly as much as building houses all over the same space, which is the current direction that Paradise Ridge is going. So, to the individuals who say don't pave Paradise, let's just forget about the plots of native grasses above E2 and build houses on it. The following picture shows the frost line on Paradise which is 3/4 mile above the E2 Route. Robert E. Clyde 	
L-7	Farrell	Byington	January 23, 2013 TO WHOM IT MAY CONCERN: This letter is written in support of the easterly route	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			(Route E2) in the realignment of Highway 95. Route E2 is the straightest, shortest, and most direct route for the last nine miles between Lewiston and Moscow on Highway 95. The need for realignment of the highway in this section is obvious and necessary for several reasons, the first one being safety. How great it would be if we had the lives back that have been lost in the last four years alone on this part of Highway 95, not to mention the suffering of those who have been injured. Because Route E2 is the straightest and most direct route, it also saves driving time and gasoline consumption, thereby helping to protect the environment through the reduction of both fuel consumption and gasoline emissions. Route E2 has the fewest access points of all the suggested realignments, which is a safety benefit, and there are enough access points to service the area it will pass through. All of us are concerned about the environment, but let's not compromise the safety of those we love who must travel on Route E2. I urge you to support Route E2 in the realignment of Highway 95. Farrell Byington 1009 Cedar, Lewiston Idaho 83501	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. General Response Access provides updated information regarding Access Control for the action alternatives.
L-8	Karen	Byiungton	January 23, 2013 TO WHOM IT MAY CONCERN: This letter is written in support of the easterly route (Route E2) in the realignment of Highway 95. Route E2 is the straightest, shortest, and most direct route for the last nine miles between Lewiston and	See Response L-7.

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			Moscow on Highway 95. The need for realignment of the highway in this section is obvious and necessary for several reasons, the first one being safety. How great it would be if we had the lives back that have been lost in the last four years alone on this part of Highway 95, not to mention the suffering of those who have been injured. Because Route E2 is the straightest and most direct route, it also saves driving time and gasoline consumption, thereby helping to protect the environment through the reduction of both fuel consumption and gasoline emissions. Route E2 has the fewest access points of all the suggested realignments, which is a safety benefit, and there are enough access points to service the area it will pass through. All of us are concerned about the environment, but let's not compromise the safety of those we love who must travel on Route E2. I urge you to support Route E2 in the realignment of Highway 95. Karen Byington 1009 Cedar Dr, Lewiston Idaho 83501	
L-9	Don and Maureen	Regan Taylor Regan	January 22, 2013 LETTER ABOUT THE U.S. 95, THORNCREEK ROAD TO MOSCOW PROJECT We live in Moscow, support environmental sustainability and have followed the U.S. 95 reroute project for 10 years. We support the E-2 Eastern Alternative for the U.S. 95 reroute which is FHWA'S and ITD'S Preferred Alternative.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General

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			Our reasons for supporting the E-2 Eastern Alternative: • Safety is the first priority, E-2 has fewer curves • Fewer access points reduces the risk of crashes • Smaller impacts on businesses and residences The Paradise Ridge Defense Coalition does not want the E-2 alternative in their backyard and continues to manipulate the importance of environmental issues to the Moscow community, putting these issues ahead of human safety, businesses and residences. Proceed with the E-2 Alternative, the FHWA'S and ITD'S Preferred Alternative. Let's make it Happen! Thank you, Don Regan and Maureen Taylor Regan 1810 Lorien Lane, Moscow, ID 83843	Response Safety-3. General Response Displacement-1 offers clarification of residential and business impacts. General Response Access provides updated information regarding Access Control for the action alternatives. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.
L-10	Keith G.	Haley	A WIN - WIN OPTION A few important thoughts on Highway 95 relocation! The realignment of 95 south of Moscow will be permanent! It is very important we get it right! I feel certain that the C-3 alternative route is absolutely the best choice! My first reason is highway elevation. Anybody that has lived on the Palouse for more than a summer knows that the hill to the north of Moscow, Steakhouse Hill & to the south Reisenauer Hill are the winter danger spots! Black ice, blowing snow and unpredictable weather issues begin in November each year and can last till late spring! I	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Responses Weather-3, Weather-4, Weather-5 and Weather-6 regarding weather conditions related to elevation, ice, wind, and blowing snow. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. It would not directly affect Paradise Ridge or Palouse Prairie but would be closer compared to the other alternatives. See General Response Weeds and Wildlife.

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			have been driving highway US 95 for 35 years! The current proposed highway relocation route E-2 increases the elevation of Highway 95 entering Moscow by directing the route up Paradise Ridge. This is unnecessary, as the C-3 alternative route takes advantage of the lower elevation and incorporates portions of the existing highway grade. I can see no justification for climbing that hill, in fact in a typical weather year it will, in fact be more dangerous. They call that area Windy Ridge for a reason! My second issue is the unnecessary destruction of the unique and delicate flora & fauna of Paradise Ridge. The serious impacts of highway construction and relocation associated with this project have been well documented. If there were compelling reasons why the E-2 site was the only option I would support the project without objection. This is not the case! I see the C-3 Highway 95 alternative as a very important WIN-WIN option! I urge the citizens of Latah County to support the C-3 route to the ITD. Keith G. Haley 320. E. Lewis Moscow 509-595-8923 Moscow	
L-11	Debbie Loaiza, B.J. Swanson and Robin Ohlgren Latah Economic Development Council	–	January 17, 2013 Jerry Whitehead, Chair Idaho Transportation Board c/o Sue Higgins, Secretary 3311 W. State St. P.O. Box 7129 Boise, Idaho 83707-1129	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			Brian Ness, Director Idaho Transportation Department 3311 W. State St. P.O. Box 7129 Boise, Idaho 83707-1129 Re: US95 Thorncreek Road to Moscow Project Chairman Whitehead and Director Ness: The Latah Economic Development Council has voted unanimously to fully support Idaho Department of Transportation's proposed E2 route to improve the US Highway 95 Thorncreek Road to Moscow Project. Safety is of utmost importance to all traveling that very dangerous section of our major state transportation link. A safe transportation corridor will also provide more reliable movement of commerce and result in greater economic value to all in Idaho. LEDC applauds ITD's diligent work at finding an excellent solution to this long time problem and hope that the project will begin soon. Thank you. Sincerely, Debbie Loaiza, President B.J. Swanson, Executive Director Robin Ohlgren, Asst. Executive Director	
L-12	Cindy Great Old Broads for Wilderness	Magnuson	326 East A, Moscow, ID 83843 Cindy Magnuson, I represent the Great Old Broads for Wilderness, a National Organization of proponents for our Wild Lands. Our local group has spent the last few years helping	The E-2 Alternative would bring traffic noise closer the area. See FEIS Section 4.12 Noise Effects. Please see E-2 Alternative See General Response Weeds and Wildlife regarding indirect effects to native vegetation due to weed dispersal. Other indirect effects are discussed in the DEIS and FEIS Chapter 6,

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			to irradicate invasive weeds from the ridge, it's been wonderful to see the native species flourish and it's such a privilege to be on top overlooking our Moscow. Last week I attended a hearing in Orofino to try and protect the N. Fork of the Clearwater River from mining. Hearing the Nez Perce remind us all by stating "We belong to the land, not the other way around" moves me as to how precious our undeveloped land are. The lands will be here long after us and we're able to protect them. The Nez Perce know plenty about losing land. Our Paradise Ridge with a highway close by will be impacted by noise, all types of debris and pollution. We will lose its beauty and the ridge will lose its remaining native vegetation. I wish no malice toward those whose homes and businesses are threatened by the C-3 alternative, 50 years ago we lost our home to a highway. Houses, businesses and yes highways are all constructed for people. Please look to the future and the ability we have now to protect the lands which are irreplaceable.	Indirect and Cumulative Effects. Mitigation measures are described in the FEIS Chapter 9, Environmental Commitments.
L-13	Joann	Muneta	ITD and public testimony Joann Muneta / 203 S Howard / Moscow January 23, 2013 ITD Representatives and Moscow/Latah County Community: Moscow is in some ways not as fortunate as our neighbors to the south, who live at the confluence of two mighty rivers, the Clearwater and Snake, or our neighbors to the north who live on the shores	The E-2 Alternative would not be located over Paradise Ridge but would be located along its base and closer to it than the other action alternatives. This could cause indirect effects such as weed dispersal, visual effects, and noise. There is already substantial residential development on the Ridge, which is expected to continue. Additional information is provided in FEIS Chapter 6, Indirect and Cumulative Effects. See General Responses Weeds and Wildlife.

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			of world-class lakes, Coeur d'Alene and Pend Oreille. But here we are happily cradled by the scenic and wonderful Moscow Mountain and by our treasured Paradise Ridge. Can you wonder why the Moscow community is speaking out to preserve the integrity of our cherished Paradise Ridge area from becoming the site of a four lane highway that could be more easily and sensibly be built along the current hwy using alternative C3? I speak not as a member of any organized group, but as a citizen who values our quality of life and our exquisite and unique natural land area. My question is now, as it was when this first was proposed in 2003....Why? Why? Why? I know that the Idaho Department of Transportation is dedicated to providing safe and sure highways for both local and non-local travelers. And we thank you for that. But that's why it makes it impossible for me to understand why you would choose E2, a route with higher elevation subject to more ice, snow, wind and rain, over C3, an alternative that is more satisfactory and will do far less damage to our culture, our scenery, our environment, and our quality of life. The information provided by ITD states lists the many advantages of C3: it requires less new right-of-way, paves over only half as much prime farmland, has much less noise effects, has less than half of the visual impact, and provides better emergency response times to local residents. The only substantial claim made for E2 is that it is safer. However this safety claim is extremely questionable	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. See General Response Safety-6 regarding the significance of the differences between alternatives for safety and length. See General Response Weather-2 and Weather-8 regarding the sampling period, the data set and the validity of the Weather Analyses. See General Response Weather-3, Weather-4 and Weather-6 regarding elevation, ice, snow, precipitation and wind. See General Response Agency regarding the difference in the preferred alternative between ITD and the resource agencies. For clarification, the USACE did not state a preference for or against any alternatives. See General Response Safety-1 regarding frontage roads for C-3.

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			given that weather studies were made for only 1/2 of the winter months in 2005, an unusually mild year with no snow impact. Only difference in length is .09 of a mile – hardly a real difference or reason to choose E2. Everyone I have spoken to joins me in asking ITD to reconsider the unwise and unfortunate choice of E2, and to make a decision that would save our natural landmark and preserve Moscow's identity and unique natural beauty. I understand that even Idaho Fish and Game and the Corps of Engineers prefer alternative C3, a safer and better choice. Please don't let us down. We all want a hwy soon and safe. Major dif in safety betw E2 and C3 is in # of access points in last .5 miles – this can be mitigated with a frontage road. – which (comment cut off)	
L-14	M. Duane University of Idaho	Nellis	July 3, 2012 Jerry Whitehead, Chair Idaho Transportation Board c/o Sue Higgins, Secretary 3311 W State Street, PO Box 7129 Boise, Idaho 83707-1129 Brian Ness, Director Idaho Transportation Department 3311 W State Street, PO Box 7129 Boise, Idaho 83707-1129 Re: US 95 Improvements Thorncreek Road to Moscow Dear Chairman Whitehead and Director Ness: The University of Idaho would like to strongly declare our support of the improvement of US	The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See General Response Safety-3. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill.

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			Highway 95, particularly the section from Thorncreek Road to the south Moscow City limits. This section is of critical importance to our many faculty, students and staff that travel the US 95 corridor on a daily basis. The incidence of accidents and fatalities which have occurred along the Thorncreek to Moscow section of US 95, especially at Reisenauer Hill, is strong evidence of the need to address needed improvements to this highway. With approximately 8,000 vehicles traveling this road daily, the incidence of crash-related fatalities and incapacitating injuries is almost twice that of roads with similar traffic loads and almost 2 1/2 times the statewide rate. The University is encouraged by the efforts which have resulted in the improvement of US 95 south of Thorncreek Road from the Lewiston Grade and hope that those same efforts can be focused on the northern section. We understand that the project is currently under review by the Federal Highway Administration and that ITD hopes to hear from that agency in the very near future. We join the Moscow City Council and the Latah County Commissioners in supporting the extension of improvements of US 95 and efforts to improve road safety for our citizens traveling to Moscow and Latah County. Sincerely, M. Duane Nellis, President	
L-15	Jim	Macdonald	Jim Macdonald 874-2991 Even tho' I've lived on P.R. Road for 35 years, I didn't get involved last time because I just assumed	The DEIS presents alternatives that are being evaluated to meet the project purpose and need for the project, to improve public safety and capacity for the travelling

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			that something so inane could have no real support. …After all, the Moscow community has two major landmarks, Moscow Mountain and P.R. Who would have any interest in defacing either? Then, since I retired a few years ago I started hearing rumors that what seemed ridiculous was in fact a "done deal." Power co. guys…ITD surveyors…a former state legislator… "Huh?" was my basic reaction…What could possibly explain persisting with their self-evident stupidity? Again, who? And what process could have resulted in this alleged done deal? …No process? Months later, many of us got the p.r. package in the mail…slick, "corporate looking"…Whose $$...Today – even slicker, more corporate…And most strangely of all the supposedly neutral state agency, the ITD (comment cut off) without providing any convincing rationales…and not even seeming to try very hard….A sense of hubris, again circumstantial evidence of a "done deal mentality"…. Then a couple of well-connected locals write public letters blaming another local citizen for the ITD's failure to do anything about the area 5 miles south of town…. If the idea is somehow the grotesque charge that "blood is on someone's hands"… those hands are those of the ITD and whoever it might be in cohorts with!... Do either of the "blame it on Al" letter writers have any connection to any of the likely ITD cohorts…? Feeling that I might be getting closer to some (any?) real explanation, I went to the informational	public which includes local residents, commuters and regional travelers including truck traffic. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent throughout the EIS process from early scoping through the FEIS development. Part of the EIS process involves providing the public with an opportunity to review the DEIS and alternatives and to consider their comments and input. This has included holding open house meetings, breakfast meetings, posting information on the website, working with citizen advisory groups, sending out newsletters, and conducting other public involvement activities as described in the FEIS Chapter 10. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Therefore, brochures and other information was distributed to provide that opportunity to the public but are not part of the DEIS which is a disclosure and decision making tool. While ITD and FHWA have identified their Preferred Alternative, each of the four alternatives were evaluated in the DEIS (No Action, W-4, C-3, and E-2). No decision will be made until all comments have been heard and considered. See General Response NEPA and Schedule.

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			meeting last Sat… (comment cut off) time around a lumber co. had openly lobbied for a "faster way out of town" ...literally a "straight line"… Conveyer belt for raw materials Think of a "slurry line"… A few cents cost-saving per chip load truck…BINGO! Finally, an answer to the dilemma of "Who?" Then I asked someone in Boise about the reputation of ITD….Another BINGO! …"Follow the money" was the Boise political observer's advice…. ITD turns out to be a handmaiden for industry; the very companies it is designed to regulate call its shots – was the word from Boise. I now suspect that a "syndication" of the ITD itself and logger/trucker/mill interests have cynically used the EIS process w/no public purpose in mind…The circumstantial evidence is theirs (comment cut off) wait until the dead of winter to release the DEIS?...It reminds me of the White House policy of releasing bad news on Friday afternoons…And even more damning are the DEIS and supporting p.r. materials. They are an intellectual hoax. On their own terms, these items don't remotely support the industry-friendly recommendation. And what they leave out (the truth!) is scandalous. They contain numerous factual misstatements and misrepresentations. Not to bring myself in…but I was a corporate securities lawyer years ago. A primary job was drafting and filing disclosure documents with the (comment cut off)…A basic rule w/public documents is that it is every bit as wrongful to not	

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			disclose material information as it is to lie. (comment illegible) [REPEAT!]…The DEIS is not yet an official public document…. If filed in its present form, it would naturally be (comment cut off) The Fed. EIS implications are obvious. I would talk to my old student Larry Warden about state charges…Which leads to not another material misrepresentation in the DEIS itself. When comparing total expenses, legal and administrative expenses, are ignored. Again, why the obvious deception – by omission? Who… These are public documents, folks. Not the private property of industry. Why is this self-evident difference ultimate exposure ignored? Why is this not a cost factor? Could it be that ITD will spend our public dollars on lawyering to save the industrial complex a few cents per load? Finally, what is key for everyone involved to keep in mind is the ITD's apparent acceptance of the "straight-line engineering," trucking efficiency argument. Think of it as the "slurry argument"… Also, keep in mind that the most likely players here…WHO ELSE? For a few pennies per load. (comment cut off) [REPEAT] Keep this in mind throughout the coming process. These people's interests would clear-cut Moscow Mountain, strip mine off the top and then describe it as a "visual change." BUT FOR ENVIROS! Compare a 4-lane hiway swathe across the face of Paradise Ridge.	

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			Let's not let them deface Paradise Ridge with their money lust. These are the people who want a property tax break on their equipment, on the one hand, and to use our public roads as a subsidized slurry on the other hand. This is talking TRUTH TO POWER…There are powerful interests…They have no interest in sharing the TRUTH!	
L-16	Al	Espinosa	January 24, 2013 Adam Rush Public Involvement Coordinator ITD Office of Communications Boise, ID 83707 Dear Mr. Rush: I have reviewed the Draft Environmental Impact Statement (DEIS) and Section 4 (f) Evaluation with respect to the US-95 Thorncreek Road to Moscow Project Proposal. I respectively offer the following comments as a citizen of Latah County and the City of Moscow. I unequivocally support the adoption of the C-3 alternative as the preferred alternative for the project. The arguments presented in support of W-4 and E-2 were not convincing or credible. I offer the following rationale in support of the C-3 alternative: • E-2 would adversely impact the last remaining and the most important segments (24) of the native Palouse prairie. If we can't save a small vestige of this native habitat, what can we save? • C-3 is the least destructive of wildlife and wildlife habitat. • E-2 will significantly impact ungulate habitat and	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would not directly affect Palouse remnants. It would come closer to remnants compared to the other alternatives, which could result in indirect effects including weed dispersal. See General Response Weeds. Regarding ungulate and wildlife habitat, the majority of the E-2 Alignment passes through farmland or CRP land. 1.98 miles of E-2 crosses an area identified by IDFG as a Low Priority Wildlife Linkage Area. Based on the various Wildlife Technical Reports, Melquist, Sawyer and Ruediger, all wildlife experts, concluded that there is no critical or high quality ungulate habitat in the project area and that none of the alternatives would result in population level impacts to ungulates. The E-2 Alternative would impact more moderate quality ungulate habitat which includes 3.9 acres of pine stand. See DEIS and FEIS Sections 4.8. General Response Safety-2 discusses how wildlife collisions were considered in the Safety Analyses.

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			populations on Paradise Ridge. Ponderosa pine stands near Paradise Ridge would be removed. Elk, deer, and moose use the pine stands for cover. • W-4 requires more right of way and stream crossings, and adversely impacts more floodplains. • Because of the weather conditions (elevation) and the potential of more collisions with wildlife, I do not believe that the E-2 option is significantly safer than the C-3 alternative. The weather study was flawed and too cryptic. Lowering speed limits and signing can mitigate crash rates. • E-2 would affect approximately twice as much CRP land compared to the other alternatives. • E-2 would present challenges for the future connectivity to the planned "ring road" project. • E-2 would adversely affect the aesthetic and social values of Paradise Ridge. Paradise Ridge is natural icon valued by all in the Moscow Community. E-2 is closer to Paradise Ridge than the other alternatives. • E-2 could adversely affect the movement of elk and moose that currently travel between a farm pond and Paradise Ridge. • E-2 may adversely affect the Spalding's catchfly in the Palouse prairie remnants. • C-3 would be the most consistent with land use goals because the areas along the existing US-95 highway are already established. • C-3 would have the fewest acres of new impervious surface. • The resource and conservation agencies (Idaho Fish and Game Dept., U. S. Fish and Wildlife Service, and the Environmental Protection Agency) all favor	See General Response Weather-3 regarding elevation and weather. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See Weather-2 regarding the data set for the Weather Analysis. See General Response Safety-6 regarding the significance of the difference between the safety of the alternatives. Lowering speed limits and signing is addressed in General Response Safety-4. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative.

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			the adoption of the C-3 alternative. Thank you for the opportunity to comment on this important proposal. Al Espinosa 735 Vista St., Moscow, ID 83843	
L-17	Jim	McIver	Friday, February 22, 2013 IDT Team, I live in Lewiston Idaho and travel frequently to Moscow Idaho via U.S. Highway 95 for work and pleasure. My understanding of the main reason for updating the highway from the top of the Lewiston Hill to Moscow was SAFETY. Therefore which ever route is deemed the safest route is the only choice. Safety trumps all other concerns. There is not a species of plant, animal, that is worth lose of a human life. Regards, Jim McIver 3527 20th St, Lewiston Id 83501 208-746-9557 jmciver@lmtribune.com cc: Governor Otter	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3. –
L-18	Brent	Knapp	Adam Rush, Public Involvement Coordinator ITD Office of Communications 3311 W. State Street, Boise, ID 83707 Dear Sir, A few weeks ago in Moscow there was a public event at which information was put out about the US Highway 95 realignment. I arrived in time to listen to some of the testimony. I also went through all of the exhibits and asked questions. Since I have	ITD is aware of the local and biological importance of Paradise Ridge. The E-2 Alternative would not directly affect the Ridge but would be located at its base in areas that are mostly farmland or land enrolled in CRP. See General Response Weeds and Wildlife.

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			lived in Moscow since 2007, I think this issue affects me so I should comment. My comment is simply this. The preferred alternative is too close to paradise ridge and will have an adverse impact on the native plants found there, which I have personally observed during an outing last year of the Idaho Native Plant Society. At least one major property owner on Paradise Ridge is very active in native plants issues and can be counted on try to keep Paradise ridge's native plants in a native Palouse Prairie state. It is everyone's duty to do everything possible to support that noble quest. Highway construction on Paradise Ridge would be in violation of that ethical duty. The new highway should be constructed as far from Paradise Ridge as possible, so I favor the most westerly of the three proposed routes. Please construct the new highway far from Paradise Ridge. Sincerely, Brent Knapp 1404 Ridge Rd #9, Moscow, ID 83843	
L-19	Cass Paradise Ridge Defense Coalition	–	Paradise Ridge Defense Coalition PO Box 8804 Moscow ID 83843 prdc@paradise-ridge-defense.org February 4, 2013 Adam Rush, Public Involvement Coordinator ITD Office of Communications 3311 W State St, PO Box 7129 Boise ID 83707 Dear Mr. Rush,	The comment period was extended to March 25, 2013. See General Response Displacement-2 for an explanation of the differences in displacement numbers. Additional clarification of residential and business impacts is provided in General Response Displacement-1. The farmland impact rating is explained in the DEIS and FEIS Section 3.3.

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			The Paradise Ridge Defense Coalition, together with Friends of the Clearwater, Palouse group of the Sierra Club, Palouse Prairie Foundation, White Pine Chapter of the Idaho Native Plant Society, and Wild Idaho Rising Tide, are requesting a 60-day extension of the public comment period on the US-95 Thorn Creek Road to Moscow DEIS. The DEIS, together with the supporting technical documents, runs to 1,300 pages or more. This is a substantial amount of material for ordinary working citizens to evaluate during their evenings and weekends. It is not only the volume of material which leads us to request an extension of the comment period. In places it is difficult to follow the decision-making process in the DEIS as there are inconsistencies in the data between documents, making quantitative comparisons between alternatives slow and cumbersome. For example, alternative C3 eliminates 7 residences in Table 8 of the DEIS but only 3 in the Screening of Alternatives document (p.17). The manner in which some of the technical material is presented also leads us to request the extension. For example, some derived parameters such as "prime farmland impact rating" are used for decision¬-making instead of the actual acreage of prime farmland impacted (this is also in the Screening of Alternatives document). This confusing presentation makes it much more difficult and tedious to tease out the actual effects of the different alternatives. Thank you for considering our request for an	

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			extension of the public comment period. Cass Davis Vice President, Paradise Ridge Defense Coalition Copied to: EPA Region 10, Seattle EPA Boise ID office Scott Reed, Attorney	
L-20	Jack S.	Hammond	March 25, 2013 Adam Rush ITD Public Involvement Coordinator P.O. Box 7129 Boise, ID 83707-1129 Re: U.S. 95 Thorncreek Road to Moscow Project Dear Mr. Rush: As a frequent user of U.S. 95 from Lewiston to Moscow, ID, I wish to support the selection and construction of the Eastern Alternative E-2 as the preferred route for the Thorncreek Road to Moscow segment of U.S. 95, for the following reasons: - E-2 is the shortest distance with the best horizontal and vertical alignment.- E-2 would provide the greatest reduction in highway accident rates associated with the existing alignment- E-2 would have the least number of access points (driveways and intersections)- E-2 would have the least effect on streams and runoff channels as the proposed alignment is closer to the origin of the watershed tributaries- E-2 is consistent with Latah County plans and City of Moscow development goals I have personally walked much of the area to be traversed by the E-2 Alternative, conducting	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. FHWA and ITD are committed to fulfilling the NEPA requirements. See General Response NEPA and Schedule for information about the environmental process and anticipated schedule. Additional clarification of the alternatives' consistency with land use plans and development goals is in the FEIS 4.2.

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			property surveys along the base of Paradise Ridge. My opinion, as a licensed Civil Engineer and Land Surveyor with 40 years of professional experience, is that the E-2 Alternative is the superior route choice for this segment of U.S. 95. The general public traveling from Lewiston to Moscow has been forced to use the existing inadequate highway alignment (includes three of the worst accident locations in Idaho) for an additional 7-8 years when the Thorncreek Road to Moscow segment of U.S. 95 was originally scheduled for reconstruction as part of the 2005-2007 project from the top of Lewiston Hill to Thorncreek Road. A small group of people forced implementation of the current Environmental Impact Statement with it's associated costs ($2,000,000+) and caused the 7-8 year delay in completing this segment of U.S. 95 at a construction cost increase of $20,000,000 (2005-2007 14 miles at $53,000,000 vs. 2015 cost for 6 miles of $43,000,000). It is time to stop all of this investigation nonsense and immediately initiate the design, bidding and construction of the preferred Eastern Alternative E-1, the route that was originally identified as part of the 2005-2007 Project. Thank you for the opportunity to comment on this extremely important U.S. 95 highway segment. Sincerely, Jack S. Hammond, PE/PLS	
L-21	Brad	Halter	301 Walenta Dr. Moscow, Idaho 83843	See General Response Weather-2 regarding the 5-month data set and how it relates to a larger 30-year

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			February 20, 2013 Adam Rush ITD Public Involvement Coordinator P.O. Box 7129 Boise, Idaho 83707-1129 Dear Mr. Rush, I have some questions and comments regarding the Draft Environmental Impact Statement, U.S. 95 Thorncreek Road to Moscow. As I have some experience with meteorological analysis and maintenance of meteorological data collection systems working for the NOAA Global Monitoring Division, I have focused on the Weather Technical Report in the following points listed below. 1. The report states that "ITD desires to characterize the climate of the study area...". To do this, why were weather data for only the first 5 months of 2005 used in the analysis? Why were not data from at least a full winter included in the analysis? On p. 5, in the Data and Instrumentation section, it is stated that the measurements are "ongoing". On p. 22, in the Historical Analysis section, continued data collection during the remainder of 2005 through summer of 2006 is anticipated. Why were these data not included in the study? The report's Analysis of Current Data section finds on p. 19 that "There was insufficient snow during the study period to present a report on this variable." The report also points out that there were months in the study period during which fog and precipitation of all types were anomalously low. Why was not meteorological data collection	data set. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, fog, visibility and other weather conditions. See General Response Weather-1 regarding the weather data collected for the C-3 Alternative. The EC and WC measurement stations were located at the end-points of an east-west continuum and represented the edges of what were referred to as the East and West Corridors. The Central Corridor lies between these. Qualls and Zhao (Qualls and Zhao, 2005) generally did not dissect climate details down to individual road alignments; however, more specific distinction was made within the Central Corridor among alignments C-1, C-2 and C-3, than within any other corridor. Furthermore, a more detailed distinction was made among proposed alignments in the accident study, using weather and alignment curve radii and slopes. See the FEIS Section 3.10 and 4.10 or the Revised Weather Analysis Technical Report (Qualls, 2014) for more information.

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			continued for a few more years beyond 2005 so that the effect of anomalous months would be diminished in a longer term average? The report relates data collected in the study area, such as temperature and precipitation, to data collected at the Plant Sciences Farm (PSF) climatological station to provide an estimate of the study area climatology. However, since no fog and visibility measurements are made at the PSF, a projected climatology for these variables is not possible, and we are left with only the 5 months of fog and visibility data collected in the study area. These are weather elements which the report states, on p. 10, the following: "Fog is a significant variable of concern in this study owing to its effect on visibility for drivers." 2. The study anticipates climate regimes in the study area for the purpose of data collection site selection, based on elevation and proximity to Paradise Ridge. Are there any previous studies which establish the existence of these regimes? The study also refers to air flow patterns in the vicinity of Paradise Ridge to define these regimes. On p. 2 it is stated that "The predominant air flow in the region is in the East - West direction." Does this mean that air flows from east to west, from west to east, or both? Are monthly climatological average wind rose data from PSF or Pullman-Moscow Regional Airport (which would present a long term climatology of air flow in the region) available? If so, and since air flow is being used as a criterion to anticipate these climate regimes in the study area,	

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			why were they not referred to in the study? The report also on p. 2 establishes an approximate demarcation line between two anticipated types of air flow over the study area. Years of personal observation of wind in the vicinity of Moscow and on Paradise Ridge indicate that there are two frequency maxima in wind direction associated with moderate wind speeds: air flow from the east through southeast, and air flow from the southwest through west. If this is true, would this not require two sets of air flow climate regimes in the study area to accommodate these two radically different regional air flow regimes? The report indicates that wind data were collected at the 3 measurement sites, but I see no exposition or analysis of these data in the report. What do these wind data indicate with regard to air flow patterns in the study area? 3. My impression of the report is that the C-3 alignment in the Central Corridor was eliminated from consideration from the beginning. No data collection site was located in the vicinity of the proposed new alignment between Eid and Cameron Roads. On p. 2 it is stated that "In order to capture the climate effects at the elevation extremes, it was determined that climate stations would be installed below 2600 feet and at or above 2900 feet". This would seem to exclude any sampling of the intermediate elevation C-3 route climate. Was the intent of the study to interpolate data between the high and low elevation sites to arrive at an estimate of conditions in the C-3 alignment? If so, I don't find	

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			in reading the report that this was done. In the analysis of alternative alignment corridors given on pp. 25-26, the report gives assessments of the Eastern and Western Corridors. Of the C-3 alignment, however, the report says only that it "...is described better by the climate description of the Eastern Corridor...". Thus, it appears to me that the Central Corridor has not actually been characterized in its own right. Nevertheless, I think that the Eastern and Western characterizations, a consideration of topography, and meteorological thinking can provide some useful inferences regarding the character of the C-3 route in relation to the other two corridors. The Western Corridor assessment includes a higher likelihood of cold air drainage temperatures leading to possible icy or frosty road surface. This is because the Western Corridor includes sections of significant length in the lowland flats where the cold air pools. The proposed new C-3 segment, located on higher sloping terrain to the east of the present U.S. 95 alignment, would be expected under these ground based temperature inversion conditions to be at a warmer temperature, either above or higher in the temperature inversion air layer. With C-3 lower in elevation than the Eastern Corridor, a reasonable expectation is that C-3 would be less susceptible to lowered visibility due to fog. Note that the report finds that the most frequent and lowest visibilities reduced by fog occurred at the higher elevation sites: EC (Eastern Corridor) and RH (Reisenauer Hill). Thank you for your time and attention to my	

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			concerns regarding this report. Brad Halter	
L-21	Frank and Cathy	Merickel	February 18, 2013 – Adam Rush Idaho Department of Transportation Public Involvement Coordinator PO Box 7129 Boise, ID 83707-1129 RE: Thorncreek Road to Moscow Dear Mr. Rush, My husband and I live at 2946 Highway 95 South, in Moscow, Idaho. We have been waiting on the decision process for widening this highway from Thorncreek Road to Moscow for at least 14 years. Ken Helm, Jim Carpenter, Tim Long and the project engineer (at that time), sat around our dining room table and first mentioned the project to us in 1999. Our youngest son was eight years old. He is graduating from college in May. First of all, we would like congratulate ITD on doing a remarkable job on the DEIS in identifying and addressing potential impacts of the three alternative routes. We appreciate the thorough job and comprehensive, detailed report. WE TOTALLY SUPPORT ALTERNATIVE E-2. No More Delay. This decision process has gone on long enough. This is one of the most dangerous stretches of major highway in all of Idaho, to say nothing of the country. It is the most dangerous region extending from Benewah County to Riggins. Too many people have died and suffered injury	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The delay to the project is due to the need for additional studies, extensive public involvement process and the need to evaluate a range of reasonable alternatives and their impacts as required under NEPA. See General Response NEPA and Schedule for a description of the environmental process and the anticipated schedule. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3. All displaced residences and businesses will be compensated and relocated according to the Uniform Relocation Act. See Appendix 5, Summary of Uniform Relocation Act. See General Response Displacement-1 for a clarification of the alternatives' impacts to residences and businesses. All action alternatives would have Expressway Access Control as described in General Response Access, which would help to minimize the development along the highway. See FEIS Chapter 6, Indirect and Cumulative Effects.

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			while this delay has continued. We watch cars slide and flip over just outside our home on a regular basis in the winter. We live at the top of the hill, just south of Moscow, and have to turn left out of a passing lane every time we turn into our driveway. Have you tried stopping for on coming traffic while you are trying to turn left from a passing lane with two lanes of traffic coming up behind you, on a curve, and they may not be able to see you sitting there with a turn signal on, pumping your brakes, in hopes that you won't be hit at 60 miles an hour from behind??? The alternative of continuing past our house, then pulling off on the highway, turning around and re-entering on a hill and curve, is not much better. How would you like your children to drive this section of highway? Just try turning off on Zeitler or Eid road, too, whether you are going north or south on Highway 95. There should be no further delays. The safest road possible should be built ASAP. Any extension of the review period or more litigation should be discouraged. *Holding us Hostage*. Our home and property will be displaced on route C-3. This project started when we were 45-years old. We will be 60-years old this year. Our home was built in 1940 and would have qualified for the historic registry had not remodeling been done over the years. We have over 300 mature conifers, (many of them 60+ years old), 25 mature fruit trees (apples, pears, plums, cherries) in our orchard, a 30' X 60' garden, and anywhere from 3-10 bee hives at any given time; this all on our 2.25 acres and within a 5 minute	The Weather Analysis was revised and provides additional data and an explanation of the validity of the methodology. See General Response Weather-8. See General Response Safety-5 regarding Reisenauer Hill. FHWA and ITD are committed to following the NEPA requirements, which require that all substantive comments be addressed and considered in the decision-making process.

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			commute of work. Our property value has gone down, we cannot sell our house because of the possibility of a highway taking us out, and it would be foolish to put much time and effort into improvements, not knowing if our home and property will be demolished or not. No one should have to endure the uncertainty, anxiety and loss in quality of life we have suffered for 15 years waiting for this highway decision to be made, especially at our age. As you can see, it is not going to be an easy property to replace. This is much more than a house; it is a sanctuary to us. These amenities on our property are why we live here. These are the things that are important to us in our life. *Our mental health is at stake here*, as we are held hostage, as well as our physical well being driving the highway every day. It is totally unacceptable to continue to wait on this project any longer. We don't have that much time left to do the things in life we anticipated at the age of 60. The delay on this project is the most frustrating experience of our lives. It is ruining our lives. We cannot urge you enough to complete the project and make sure all things are in order to prevent further litigation. We highly encourage all state and federal agencies to work together to make this happen. Safety is the Main Issue. Three of the top thirteen most dangerous half-mile segments in all of Idaho highways are found in these 5 miles. The high accident rates are due to too many private accesses (such as our own driveway), curves, hills, weather, and increasing traffic volume. You can check the	

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			data for yourself concerning the injuries and deaths that have occurred during the past ten years, while we have been waiting for a new highway. Route E-2 is the safest route and is the only route that deals with Reisenauer Hill, where many accidents occur. It is estimated E-2 will reduce accident rates by 69%. E-2 is clearly the safest alternative. It is the straightest, shortest, least expensive route, with the fewest accesses, the least poor weather conditions. E-2 is the only alternative that eliminates Reisenauer Hill, minimizes curves, has the minimum number of accesses and is most favorable for conversion to "no access" status for the next generation of highways. Private Property. *E-2 is the Least Disruptive Alternative*. Nearly all of the land in the corridor is private property. The owners of more than 80% of this property have contacted ITD and notified them our preferred route is E-2. It has the least impact on private property, including homes and businesses. E-2 minimizes residential and business relocation, and the number of remaining homes and businesses that must access the highway directly. E-2 results in the least fragmentation of farming operations, including that of family homesteads. It best preserves, protects and services the current agricultural practices in the area; and is the least likely to encourage suburban encroachment into some of the best farmland in the northwest. The majority of farmers impacted by all three routes agree that E-2 is the best alternative and least	

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			interferes with their operations. *This Land is Private Property, Including Paradise Ridge.* Most of the opposition to route E-2 is based on NIMBY landowners of property on Paradise Ridge, who do not live in the corridor of any of the three routes and will not have their property or homes destroyed by E-2. The other major opposition, which the NIMBY folks have joined in an effort to keep the highway away from their "view," is concerned with the Palouse Prairie remnants. All of this land is privately owned. Any farmer or landowner could decide to plow up their land and dispose of the Palouse Prairie remnants at any time. Over the years these landowners have graciously allowed public access and encouraged prairie restoration and have shown a true commitment to valuing this land. However, it is mostly CRP land and it is PRIVATE. The point being, who are these folks to tell the private land owners which route they should prefer based on the non-land owners preferences???? We participated in public hearings before the highway expansion got underway, to prevent three subdivisions going in north of Cameron Road on wells and septics on a 25% slope!! If the city and county had allowed this, their beloved Palouse Prairie would be all gone by now from the development. As it is, four large homes with large plots of property have already been built on Cameron Road despite the impending highway. We have watched as other homes have been built along the E-2 area as well, since this highway project	

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			began, knowing full well they would become part of the coalition opposing E-2. E-2, being a limited access highway, would act as a restraint on ridge development and suburban encroachment from the West. The Palouse Ridge Defense Coalition and other environmental groups argue that they want to save the Palouse Prairie Remnants. Unless they own the land, they do not have a say, unless they can buy the land and protect it. There are no guarantees that future owners and potential development will decide to ensure the perceived character of the ridge sought by the opponents of Alternative E-2. If they truly value the land, and don't want to see it disturbed, why are they building their homes, corrals, outbuildings and bringing in animals, which will do nothing but destroy the very areas they espouse they want to save? I suggest their efforts would be better spent buying the property from the farmers, and putting it in a land trust. No homes, no nothing. Adverse Effects. We recognize there will be adverse effects with any route. But the positive aspects of replacing the current highway far outweigh any of the potential ill effects. Nevertheless, we urge ITD to conscientiously mitigate those adverse effects to both the environment and impacted homeowners. We believe impacted homeowners and property owners must have mitigation that replaces their property with like property. As I mentioned above, our property values have declined due to the uncertainty of this decision. It would be unfair of	

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			ITD to benefit by lower condemnation to homeowners who have suffered diminution in value due to ITD's delays. Regarding those who will be relocated or will lose significant portions of their property, we encourage ITD to assist them with sufficient compensation in order to obtain comparable property elsewhere and maintain their quality of life, no matter which alternative is ultimately selected. Alternative E-2 is an opportunity for ITD to mitigate plant issues by creating native plantings all along the highway, possibly creating a rest area for the Palouse Prairie to be viewed by all who travel through Moscow. ITD can develop programs to preserve and improve habitat in the corridor, in addition to creating a limited access area that is protected. As far as wildlife mitigation, we are well aware that the herds travel East-West and are attracted to all of the fruit in property owner's orchards, in addition to foraging elsewhere. No matter which way the highway goes, the herds will go where they please. They already cross the existing highway back and forth. We strongly believe ITD should ensure that environmental mitigations be local and serve to replace the resources in this area, rather than cash payments to another agency.Many of those opposed to Alternative Route E-2 claim to do so in the interest of Paradise Ridge. In reality, these opponents are attempting to prescribe what to do with someone else's private property. We are environmentally sensitive, too. It is our land and we	

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			are responsible stewards. Many of us would rather not see Paradise Ridge developed; but residential encroachment on farm and woodlands on the Ridge is a private property issue, and a far greater endangerment to habitat than this highway. Another tactic by the opponents to E-2 has been to disparage the weather study done by our State Climatologist, Russ Qualls. We talked to Russ Qualls at the public hearing and felt he did a good job of explaining the results, which were difficult to glean from the facts in the weather technical report. We implore ITD to be very thorough in addressing any remaining questions concerning the weather report, so as to avert any possible litigation. ITD has done a commendable job on this DEIS in responding to complaints and comments on this project. It is time to make highway 95 safe, it has been dangerous way to long. We applaud your recommendation for Alternative E-2 as the only route that: Avoids lethal Reisenauer Hill Provides the straightest route that avoids prime farmland Has the support of the landowners/farmers who own that land Impacts the least number of homes and businesses Provides the fewest and safest accesses Has environmental impacts that CAN be effectively mitigated locally Does not have an impact on an endangered species Avoids historic preservation issues Is the safest and most cost-effective route	

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			In closing we would like to say that we certainly hope this decision is not made by a popularity contest, but based on the facts and documentation supported in the DEIS. As private property owners, who drive this highway daily, live here, work here and pay our property taxes, we should have more to say in what happens with this highway alignment than anyone who lives in town, out-of-state or is only concerned about their "view." We look forward to a timely decision and construction of E-2 as soon as possible. Sincerely, Frank Merickel 2946 Highway 95 S. Moscow, ID 83843 208-310-2715 – Cathy Merickel 2946 Highway 95 S. Moscow, ID 83843 208-882-2291	
L-23	John and Christie	Thomas	US 95, THORNCREEK ROAD TO MOSCOW PROJECT "Draft Environmental Impact Statement" WRITTEN PUBLIC COMMENT February 22, 2013 – From: John and Christie Thomas PO Box 220 Worley, ID 83876-0220 – To: Mr. Adam Rush	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Hybrid Alternative-The alternative that you mentioned would combine the northern portion of the E-2 Alternative with the southern portion of the C-3 Alternative. This would possibly create a much longer route with a large variation in grades. This would be expected to have a higher crash rate compared to the

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			ITD Public Involvement Coordinator PO Box 7129 Boise, ID 83707-1129 RE: Written Public Comment – Mr. Rush, We are well-educated owners of multi-family residential property, Hidden Village Mobile Home Court, along US 95 in the project limits. There are 32 homes in our park. For 20 years we owned and managed a successful construction company, which focused on road construction in North Idaho. John has spent the last 5 ½ years as Public Works Director of Shoshone County in Wallace, ID. As professionals, at times, we know it is possible to get so involved in a project that we can't see the forest through the trees. The summary of alternatives' benefits and effects tables, for the most part, identify the impacts of each alternative. What is not clear or understandable is why the Idaho Transportation Department (ITD) didn't minimize the negative impacts of the project by proposing a hybrid of the final alternatives. It is very common, when selecting a preferred alternative, to combine the positive attributes of different alternatives and create the best overall solution. Your preferred alternative, route E-2, is not the best solution since it does not minimize the overall environmental impacts. To minimize the environmental impact of this project and still achieve the desired goals, the northern portion of route E-2 should be combined with the	E-2 Alternative. 1) Mobile Home Park Resident Opinions-Since the DEIS Public Hearing, ITD has conducted a series of meetings with the owners and residents of the Hidden Village Mobile Home Court. These meetings were held to obtain input from the residents and owners and to provide information regarding the potential impacts in the area. ITD also revised the safety analysis to consider the safety of the accesses onto the existing US-95. See General Response Safety-3. ITD and FHWA will ensure that the project would not affect the quantity or quality of groundwater. Additional information regarding the effects of salt on surface and groundwater is provided in the FEIS Section 4.7. 2) Any wells that could be potentially impacted will be relocated to a more suitable location. Well locations will be shown in final design plans to avoid contamination from road runoff. See General Response Water. 3) Information regarding the grades for each alternative has been provided in the FEIS Section 4.10 Transportation Effects. Information regarding road grades and curvature in relation to ice formation on north facing slopes has also been provided in General Response Weather-3 and Weather-4. 4) Regarding the fairness given to the residents of the Mobile Home Park residents, any displaced or impacted residents would be given fair and equitable treatment under the Uniform Relocation Act. See FEIS Appendix 5.

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			southern portion of route C-3. If this hybrid alternative C-3/E-2 was analyzed along with the other alternatives, the best solution would be clear to engineers and locals. The point where C-3 route joins route E-2 needs to be determined with all the same criteria used for the other alternatives. We are formally requesting that the ITD consider this hybrid route C-3/E-2 and fairly analyze its benefits and effects. The ITD must not overlook this solution or take a defensive position in supporting their recently chosen preferred route. Moreover, the Federal Highway Administration (FHWA) must require the ITD to evaluate the proposed C-3/E-2 hybrid alternative. Additional, we have significant concerns with the lack of clarity with the impacts to the southern end of the E-2 route: 1) The DEIS does not adequately address the severity of the impacts associated with access to and from new US 95 for residents of Hidden Village Mobile Home Park and Benson Mobile Home Park. The access impacts are noted but insufficient information was discussed or simply not understood. We know many of the individuals that live in these two parks and they feel intimidated by the public involvement process. We are formally requesting that the ITD investigate, beyond what has previously been done, the opinions of the resident of Hidden Village and Benson Mobile Home Parks. The EIS process requires that a good faith effort is made to gather opinions of individuals	

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			affected by the project. A good faith effort was not accomplished with these residents based on their lack of understand and willingness to voice their opinions in public. 2) The DEIS does not adequately address the potential impact to waters of the United State and wells. The ITD does use salt for road maintenance during such times of the year, therefore more details need to be studied or stated on the impacts of salt and the effects on the new drainage patterns created in this area. We are formally requesting that the ITD investigate, beyond what has previously been done, the severity of the impact to the waters of the US from road maintenance using salts. 3) The DEIS does not adequately address the safety impacts to the grade (vertical alignment) of the alternatives or the effects of south verses north facing slopes. It is always subjective to the weight factors that are given to individual impacts. However, safety should always have a very high weighting factor. We are formally requesting that the ITD investigate, beyond what has previously been done, the severity of the safety impacts to the grade of each alternative and the effects on southern verse northern facing slopes. 4) It appears that the DEIS does not fairly value the existing Mobile Home Parks based on the manner that the information is presented and the quantity and quality of the information gathered. A better way to describe this concern is the lack of importance given to the impacts to the Parks.	

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			Hidden Village Mobile Home Park and Benson Mobile Home Park have been in existence from the early 1970's and are very well established for a certain economic class of people. Impacts on the lives of these residents and/or relocation would be very difficult. Again, we are formally requesting that the ITD investigate the fairness given to the Mobile Home Parks as compared to other environmental concerns and impacts. Basically, people matter too. It is obvious that significant time and money and effort has been put forth on this project. Also, it is very obvious that safety improvements are greatly needed on this stretch of highway. However, in order to get the best solution for the overall purpose and need, the federal process must be followed without bias and time constrains. Spending the time to address our concerns and requests will only strengthen the final solution and get the best project for all. Route E-2 may appear to be the choice of the alternatives that were evaluated but clearly a better alternative is available and should be considered. If you have any questions or would like to further discuss our comments, please contact us any time, John at 208-512-5779 or Christie at 208-659-6486. Respectfully, Christie and John Thomas Owners Hidden Village Mobile Home Court, Moscow, ID COPY: Peter Hartman, Federal highways	

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			Jim Carpenter, ITD	
L-24	Citizens for Safe 95	–	Citizens for a Safe 95 March 22, 2013 Letter Citizens for a Safe 95 3697 Highway 95 Moscow, ID 83843 – March 22, 2013 – Adam Rush Idaho Department of Transportation Public Involvement Coordinator P.O. Box 7129 Boise, ID 83707-1129 – Dear Mr. Rush: Citizens for a Safe 95 is a group of more than 90 landowners who own, rent, and reside on property impacted by one or more of the alternative alignments assessed in the Thorn Creek-to-Moscow Highway 95 Draft Environmental Impact Statement [DEIS]. Collectively, we own more than 80% of the property ITD needs to acquire for any of the proposed new routes. We previously supplied ITD with a map showing our supporters (an updated version is attached). We believe the ITD has done a comprehensive, detailed, and thorough job with the DEIS. We unanimously support the Preferred Alternative—Route E2. Everyone signing this letter is a landowner, tenant, or business owner* in the area affected by one or another of the proposed routes for the new section of highway. We have followed	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. ITD and FHWA have committed to implementing the mitigation measures that are listed in Chapter 9, Environmental Commitments. These include mitigations for impacts to wildlife, biological resources and landscapes including weed control, replacing the functions and values of impacted wetlands, and accommodating safe wildlife movement through the corridor. ITD has met with IDFG and come to an agreement mitigation measures (avoidance, minimization, and compensatory mitigation) for impacts to potential restoration sites, indirect effects to Palouse remnants, and wildlife habitat and will seek local mitigation. ITD is committed to working with IDFG and USFWS through design and project implementation to further refine mitigation measures described in Ch 9 Environmental Commitments. Any displacements of residences or businesses will be in accordance with the Uniform Relocation Act which, requires that compensation be according to the fair market value. See Appendix 5 for a summary of the Uniform Relocation Act. Additional information regarding the indirect and cumulative effects, which include the impacts of the existing and proposed future development in and around Paradise Ridge, has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer

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			this project—closely—since the late 1990s. For many of us, the uncertainty about where this highway will go has interfered with the use and disposition of our property for a decade. More importantly, we and the thousands of vehicles that travel Highway 95 daily have endured a dangerous roadway for too long. There are numerous reasons why we believe E2 is the best alternative and some are listed below. But the bottom line is we support Route E2 because it is the safest, least disruptive, and least expensive alternative. ITD's DEIS has done a remarkable job in identifying and assessing the potential impacts of the alternative routes. We recognize that there will be adverse effects with any route. But the positive aspects of replacing the current highway far outweigh any of the potential ill effects. Nevertheless, we urge ITD to conscientiously mitigate those adverse effects on both the environment and impacted homeowners. With respect to the environment we believe that appropriate mitigation of the impacts to wildlife, biologic resources, and landscape can be accomplished and—possibly—enhanced with Alternative E2. We support, and many of our members would be willing participants in, programs to preserve and improve habitat in the corridor. We strongly believe ITD should ensure that environmental mitigations be local and serve to replace the resource in this area, rather than cash payments to another agency. With respect to the acquisition of private property,	Hill. General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95.

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			we similarly believe that any relocation or purchase should also be on the basis of replacing like property. Over the last decade many homes in the area have lost value due to the uncertainty in this decision. We believe it would be unfair for ITD to benefit by lower condemnation compensation to homeowners who have suffered diminution in value due to ITD's delays. Regarding those who will be relocated or will lose significant portions of their property, we encourage ITD to assist them with sufficient compensation in order to obtain comparable property elsewhere and maintain their quality of life. We are willing and anxious to cooperate with ITD in "fine-tuning" Alternative Route E2 and the acquisition of the new right-of-way. However, the process of taking our land must be completely necessary and fairly compensated. We support Alternative E2 because we are convinced that this section of Highway 95 must be made as safe as possible for the thousands, ourselves included, who use it daily, and it must be built as quickly as possible. ITD has done a commendable job on this DEIS and of responding to all the complaints and comments that dangerously stopped this project years ago. ITD is now recommending the <u>only</u> route that: • avoids lethal Reisenauer Hill; • provides the straightest route that avoids prime farmland;	

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			• has the support of the landowners/farmers who own that land; • impacts the least number of homes and businesses; • provides the fewest and safest accesses; • has environmental impacts that can be effectively mitigated locally; • does not have an impact on an endangered species; • avoids historic preservation issues; • is the safest and most cost-effective route. We congratulate you on a job well done in the interest of all those who traverse this beautiful state and who value the Palouse in particular. Many of those opposed to Alternative Route E2 claim to do so in the interest of Paradise Ridge. But in reality, these opponents are attempting to prescribe what to do with someone else's private property. We, Citizens for a Safe 95, are also environmentally sensitive: it is our land and we are responsible stewards. This highway has and will continue to pass through our property. We appreciate the character of and the importance of Paradise Ridge to the community. Many of us would	

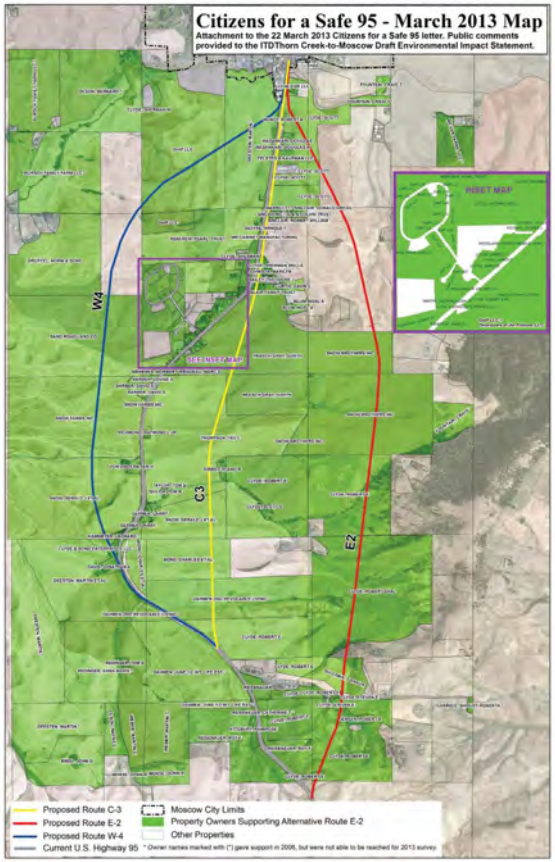
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			rather not see Paradise Ridge developed; but residential encroachment on farm and woodlands on the Ridge is a private property issue, and a far greater endangerment to habitat than this highway. We ask that ITD proceed with Alternative Route E2 and respect the concerns of those who must give up their homes and property for the safety of those who use Highway 95. – We urge you to listen to and consider the comments of all citizens, develop an effective mitigation strategy for the Preferred Alternative Route E2, publish the Final EIS selecting Alternative Route E2, and move forward with design and construction that minimizes the adverse impacts to the landowners affected. Too many have suffered in this decade of delay. – Sincerely, Citizens for a Safe 95 Beverly Anderson (hand-signed) Rami Attebury rosebudy23@gmail.com Ted Bailey tnbailey@juno.com Norma Bailey tnbailey@juno.com David Barber dbarber@uidaho.edu John Bindl bindlfarm@msn.com Rita Bindl bindlfarm@msn.com Don Blair sblair@turbonet.com Sandy Blair sblair@turbonet.com Noel A. Blum cblum3@gmail.com Cindy Blum cblum3@gmail.com Dan Carter carter4moscow@yahoo.com	

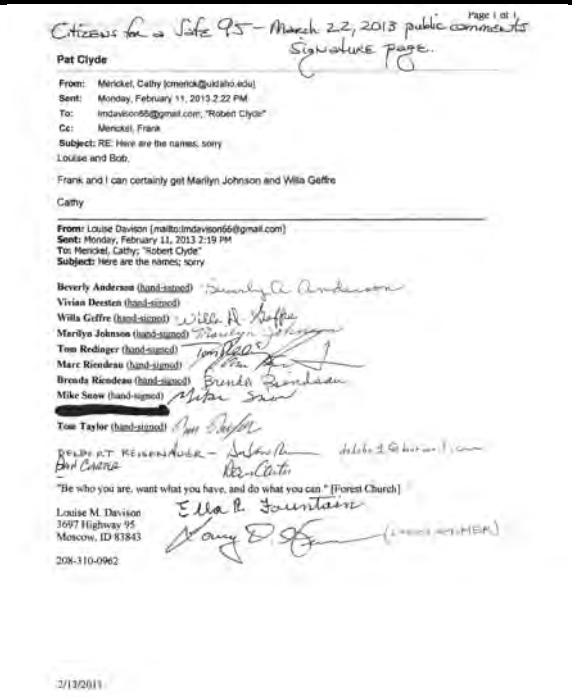
#	First Name	Name	Comment	Response
			Dana Carter carter4moscow@yahoo.com Nancy Carter carter2122@roadrunner.com Jim Christiansen jimlchristiansen@gmail.com Robert Clyde pclyde@moscow.com Patricia Clyde pclyde@moscow.com Scott Clyde pclyde@moscow.com Steve Clyde pclyde@moscow.com Clyde & Bond Enterprises LLC pclyde@moscow.com Clyde 5 LLC pclyde@moscow.com Sherm Clyde clydesantiques@yahoo.com Jan Clyde clydesantiques@yahoo.com Gavin Curtis gavincurtis@yahoo.com Jon Davis j-cmailcdavis@roadrunner.com Christa Davis christadavis@vandals.uidaho.edu Louise Davison lmdavison66@gmail.com Developers of the Palouse (hand-signed, Larry Germer) Norm Druffel njdruffel@pullman.com Jessie Druffel njdruffel@pullman.com Norm Druffel and Sons njdruffel@pullman.com Wayne Druffel njdruffel@pullman.com Roy Druffel njdruffel@pullman.com Ken Druffel njdruffel@pullman.com Mark Druffel njdruffel@pullman.com Jack Flack sflack@moscow.com Suzie Flack sflack@moscow.com Snow Farms, Inc. sflack@moscow.com Rick Flomer rflomer@turbonet.com Ella Fountain (hand-signed) Don Frei DonF@turbonet.com Willa Geffre (hand-signed) Chip Geffre cgeffre@turbonet.com	

#	First Name	Name	Comment	Response
			Maria Geffre cgeffre@turbonet.com Larry Germer (hand-signed) Lee Gibbs lgibbs@zionsbank.com Rhua Gibbs gibbs1973@gmail.com Del Hungerford delh@uidaho.edu Robert Jensen (telephone consent) Terry Johnson-Huhta thuhta@moscow.com Marilyn Johnson (hand-signed) Tony Johnson johnsonexc@moscow.com Michel Kaufman (telephone consent) Bill Mabbutt gemstate@frontier.com Diane Mabbutt yotie7@gmail.com Hugh Martin bikergrammy2@gmail.com Linda Martin bikergrammy2@gmail.com Neil Marzolf neilmarzolf@yahoo.com George Masters kittymas@roadrunner.com Kitty Masters kittymas@roadrunner.com Frank Merickel fcmerick@moscow.com Cathy Merickel cmerick@uidaho.edu Donn Morse donnmo@lewiston.com Lisa Morse lisamo@lewiston.com Mundy's Machine and Welding mundys@frontier.com Al Mundy mundys@frontier.com Dayle Mundy mundys@frontier.com Norb Niehenke njniehenke@directv.net Janell Niehenke njniehenke@directv.net Wayne Olson olson.wayne.moscow@gmail.com Annette Olson atolson@hotmail.com Judith Paasch-Gray (telephone consent) Steve Potratz potratz6@msn.com Ellen Potratz potratz6@msn.com	

#	First Name	Name	Comment	Response
			Steve Redinger sredinger@metriguard.com Barbara Redinger barb.redinger@johnstonesupply.com Tom Redinger(hand-signed) tomredinger7@frontier.com Delbert Reisenauer (hand-signed) dedobe1@hotmail.com Roy Reisenauer (personal contact) Ray Richmond richmond@moscow.com Nancy Richmond richmond@moscow.com Marc Riendeau (hand-signed) Brenda Riendeau (hand-signed) Sand Road Land Co. njdruffel@pullman.com Don Sinclair d_g_sinclair@msn.com Mike Snow (hand-signed) Tom Taylor (hand-signed) Ted Thompson (telephone consent) Margrit von Braun vonbraun@uidaho.edu Ian von Lindern ian.vonlindern@terragraphics.com Wasankari Construction brecycler@hotmail.com Stacey at Wasankari badpirates@hotmail.com Martin C. Weber (telephone consent) Woodland Heights Mobile Homes (telephone consent, James Schleuter) – *The following represent those who do not own or rent in the area of impact but drive, or have driven, the area repeatedly; the list also includes those who no longer live along the highway. The following all agree with support for E2: – Christopher Barber cmbarber@hotmail.com	

#	First Name	Name	Comment	Response
			Leslie Barber leslies@gmail.com Steve Barber sfbarber19@gmail.com Thomas Barber thomash.barber@gmail.com Benjamin Bailey Ben.Bailey@terragraphics.com Joanna Bailey redfernlibrarian@gmail.com Steve Barr daneswb@hotmail.com Jim Bielenberg jim.judy.bielenberg@gmail.com Judy Bielenberg jim.judy.bielenberg@gmail.com LeNelle McInturff lenellem@moscow.com Esme Weigand esmeschwall@gmail.com Jonathan Weigland jon.weigand@gmail.com	

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			 Citizens for a Safe 95 – March 22, 2013 public comments Signature page. Pat Clyde From: Merickel, Cathy [cmerick@uidaho.edu] Sent: Monday, February 11, 2013 2:22 PM To: lmdavison66@gmail.com; "Robert Clyde" Cc: Merickel, Frank Subject: RE: Here are the names, sorry Louise and Bob, Frank and I can certainly get Marilyn Johnson and Willa Geffre Cathy From: Louise Davison [mailto:lmdavison66@gmail.com] Sent: Monday, February 11, 2013 2:19 PM To: Merickel, Cathy; "Robert Clyde" Subject: Here are the names; sorry Beverly Anderson (hand-signed) Vivian Deesten (hand-signed) Willa Geffre (hand-signed) Marilyn Johnson (hand-signed) Tom Redinger (hand-signed) Marc Riendeau (hand-signed) Brenda Riendeau (hand-signed) Mike Snow (hand-signed) [redacted] Tom Taylor (hand-signed) DELPAT KEISENAUER – Bad Cheese "Be who you are, want what you have, and do what you can." [Forest Church] Louise M. Davison 3697 Highway 95 Moscow, ID 83843 208-310-0962 Ella R. Fountain [redacted] 2/13/2013	
L-25	Ian	von Lindern	**Thorn Creek to Moscow Draft Environmental Impact Statement – March 25, 2013** **Written Testimony of Ian von Lindern, 1075 Snow Road, Moscow Idaho.** **General Comments:** My name is Ian Von Lindern. I have resided at 1075 Snow Road, Moscow Idaho for the past 27 years. I am a licensed Professional Engineer in the State of Idaho, Chief Executive Officer of TerraGraphics Environmental Engineering, and hold a PhD in Environmental Science and Engineering from Yale University. I have directed more than 50 major	ITD and IDFG have met during the FEIS development and agreed upon the mitigation measures described in Chapter 9, Environmental Commitments. ITD has committed to work with IDFG before final design to further refine the mitigation measures. See General Response Agency. ITD recognizes that the majority of the comments in opposition to ITD's Preferred Alternative are located outside of the project area and are directed towards indirect effects; however, NEPA requires that all substantive public and agency comments on the DEIS must be considered.

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			environmental assessment and restoration projects over the past 40 years and, in the course of my career reviewed several hundred environmental assessments and impact studies. I currently serve on the Science Advisory Board for the U.S. Environmental Protection Agency. I present this testimony in both a Professional capacity and as a resident of the affected area. I have reviewed the entire ITD Environmental Impact Statement (EIS) report and find it to be, perhaps, the most comprehensive environmental analysis per mile of highway ever accomplished in Idaho, matched only by the Wallace Overpass and Sandpoint Bypass in northern Idaho. The alternatives are well-researched and conclude, much as the last round in 2003, that route E2along the base of Paradise Ridge is the safest, shortest, least expensive, and least disruptive alternative. The majority of us who live and work in the area, overwhelmingly support Alternative E-2 that ITD has identified as the preferred alternative. We support ITD, commend you for your thoroughness, encourage you to mitigate any adverse effects, and urge you to move forward ASAP to produce the Final Environmental Impact Statement without further delay. There are, however, a couple of areas where ITD did not do enough to recognize the impacts on people who own, and live on, the land actually touched by these routes – as opposed to Moscow City people and outsiders – who are trying to dictate other citizens' use of their private property. Our family is	Regarding litigation, additional clarification has been added to the FEIS Executive Summary and Chapter 1, Introduction. ITD and FHWA recognize that continued delay of the project could result in additional deaths and injuries on this dangerous stretch of roadway and are committed to working with all agencies and the public to implement a solution to address the identified deficiencies. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. As stated in your comment letter, Paradise Ridge is privately owned property with development and that there are voluntary restoration efforts being completed on some properties. ITD and FHWA have proposed mitigation measures to minimize indirect effects to Paradise Ridge and these restoration sites. See FEIS Chapter 9, Environmental Commitments. Additional information regarding the indirect and cumulative effects to Paradise Ridge, including existing and proposed private development has been added to the FEIS Chapter 6, Indirect and Cumulative Effects. The FEIS has been revised to reflect your well located at 1075 Snow Road. The E-2 Alternative would offer the greatest safety benefit as explained in General Response Safety-3. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Weeds discusses the alternatives' indirect effects to vegetation. General Response Wildlife discusses the alternatives'

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			among those who live here, do business here, have our lifetime investments here, pay taxes on this property, and live on and use this highway every day. The residents and property owners whose land is directly touched by the four alternatives overwhelmingly support Alternative E2 because it directly affects their everyday home life. We have submitted Group Comments for Citizens for a Safe 95 that includes signatures from more than 90 landowners and includes owners of more than 80% of the property directly impacted by the four Alternatives (including the No-Action Alternative). In contrast, most of those that oppose the E2 alternative largely live outside the Study Area, do not own property directly affected by the alternative routes, and are concerned about indirect effects on Paradise Ridge, much of which is on the periphery or outside the Study area. – **Continuing Litigation Issues** Nevertheless, the Paradise Ridge Defense Coalition and other environmental activist groups have mounted vigorous opposition based on perceived, but often unsubstantiated, potential environmental impacts. These groups, through canvassing events such as University of Idaho athletic and cultural events, the Jazz Festival, and social networking can amass more signatures than there are residents in the study area. Many of these adherents are unfamiliar with the area and the issues, but nevertheless, wish to dictate what happens on	effects to the vegetation and wildlife on Paradise Ridge. The well was added to the FEIS Section 3.7.3.

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			other citizens' private property. Those of us that are directly impacted cannot match them in numbers because their support overwhelmingly comes from outside the Study Area. We are also concerned that history of the project presented in the DEIS is not entirely forthcoming. It is true that Alternative 10A was selected by ITD and FHWA and a Finding of No Significant Impact (FONSI) was issued in May 2002; and that the was litigated by the Paradise Ridge Defense Coalition, Inc. in 2003. However, the court finding that an Environmental Impact Statement (EIS) would be required for the northern 4.6 mile segment between Thorncreek Road and Moscow was predicated largely on the ITD's failure to properly consider the comments of the Idaho of Fish and Game Agency (IF&G) in completing the FONZI. The statement in this DEIS "… to allow full consideration of the impacts by the public and agencies" was actually related to the two Agencies' (ITD and IF&G) failure to cooperate on impact assessment and mitigation issues. This discordance seems to be ongoing in the current DEIS, where it is noted that there is a continuing failure to cooperate, agree on impacts, and disputed notions of appropriate mitigation. It seems that ITD failed to provide IF&G the DEIS in a timely manner requiring an extension to the comment period. The end result of this failure in 2003 has been that we have lived with the 4th – (No-action) Alternative for 6 years, and will continue to do so for another 3-4 years. In that decade many people	

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			did, and will continue to, die and suffer debilitating injuries, and $10s of millions of dollars in health and property damages. We fear that the continued failure of ITD and IF&G to collaborate will provide fodder for additional lawsuits that will needlessly squander more lives and inflict terrible pain, suffering, and damage on highway users and adjacent landowners. In order to forestall such an unfortunate outcome, we have appealed directly to the Board of ITD, State Fish and Game Commissioners, the Agency Directors, the Governor and the Board of County Commissioners to see that all of our public servants cooperate, select the appropriate alternative and mitigation, and construct this new route as soon as practicable. Copies of those letters are attached. We also urge you to consider the comments of the federal Department of Interior, clarify the EIS by providing additional information, and propose appropriate mitigations in implementing Alternative E-2. **Safety and Delay Issues** *No More Delay.* This decision process has been going on for nearly 20 years. This is one of the most dangerous stretches of major highway in all of Idaho, and the most dangerous in our region, extending from Benewah County to Riggins. Too many people have died and suffered severe injuries while this delay has proceeded. Our friends and neighbors continue to use this road every day and we and our families are at unnecessary risk. There should be no further delays. The safest road	

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			possible should be built ASAP. Any extension of the review period or more litigation should be discouraged. – ***Safety is the Main Issue.*** Three of the top thirteen most dangerous half mile segments in all of Idaho highways are found in these 5 miles. Considering Idaho's terrain and climate, this is remarkable. The high accident rates are due to too many private accesses, curves, hills, bad weather conditions, and ever increasing traffic volume. The DEIS cites five fatalities and 18 severely debilitating injury accidents occurred since the current court imposed delay, nearly ten years ago, and the publication of the report. Most of us will remember the young area family lost on Reisenauer hill not included in these statistics (a pregnant woman, another mother and 10 month old infant and a grandmother). The preferred alternative, Route E2 is the safest and is estimated to reduce accident rates by 69%, the most of any alternative. That would have translated to four less deaths, 13 less severely debilitating crashes, and 150 less accidents over the past ten years. More of these tragic crashes are projected to occur in the future, as traffic volume increases We have counted five injurious accidents and one death, a father of five, during this eight week comment period alone, that, unfortunately, must be added to the record of carnage. – E2 is clearly the Safest Alternative. It is the straightest, flattest, shortest, least expensive route;	

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			with the fewest accesses, and least poor weather conditions. E2 is the only alternative that eliminates Reisenauer Hill, minimizes curves, has the minimum number of accesses and is most favorable for conversion to "no access" status for the next generation of highways. The EIS should also point out that Alternative E-2, as opposed to Alternative C-3 will result in the conversion of the existing highway from the Moscow City Limits to Reisenauer Hill to a County Road. This will result in all of the current 66 access points being onto a County Road with significantly less traffic volume. This is particularly important for the harvest equipment that must pull onto to highway with heavy loads, during the time of heavy traffic with students returning to the University of Idaho; and the businesses whose customers impede the high speed traffic on the current two lane system. All of us who live and work in this area will be at much reduced risk in accessing the County road, as opposed to the US Highway. Both speed and weight restrictions can be enacted locally to further reduce the danger. Alternative C-3 will keep the majority of these access points on the federal Highway, leaving us to content with the through traffic and interstate trucks. – Private Property and Land Use Disruption Issues E2 is the Least Disruptive Alternative. Nearly all the land in the corridor is private property. The owners of more than 80% of the land directly impacted by the four alternatives have notified the ITD that they	

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			prefer alternative E2. E2 is less disruptive of local businesses; minimizes residential and business relocation, and the number of remaining homes and businesses that must access the highway directly; results in the least fragmentation of farming operations; best preserves, protects and services the current agricultural practices in the area; and is the least likely to encourage suburban encroachment into some of the best farmland in the northwest. The vast majority of farmers impacted by all three routes agree that E2 is the best alternative and least interferes with their operations. – *Paradise Ridge is Private Property.* Most of the opposition to Route E2 centers around potential impacts to wildlife, remnants and restoration of native prairie, and visual effects on Paradise Ridge. These alleged effects occur on private land at the base of the ridge on the periphery of the study area, or largely outside the study area on the ridge itself. All of this land is private property. Currently, the ridge is subject to considerable pressure for residential development, is becoming less accessible to the public, and less hospitable to wildlife. As the ridge area continues to develop and is fragmented into suburban homes and lots, human interaction and habitat loss will be particularly significant with respect to big game and predator species, and predation and disturbances by suburban pets will more adversely affect these and other non-game populations than the proposed	

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			highway. Weeds, invasive domestic plant species, and disease will become ever more prevalent with the suburban residential creep occurring on the ridge. This trend is likely to get worse in the future. – *Stewardship of Paradise Ridge.* Most of the landowners on and adjacent to the ridge are responsible stewards and many generously have allowed public access to their property for generations, although no trespassing signs are becoming more prevalent. With respect to prairie restoration, significant portions of these efforts are being undertaken by landowners who support alternative E2. Many of these owners view alternative E2 as a restraint on ridge development and suburban encroachment from the west. They believe locating the highway at the base of the ridge may, in the long run, better preserve the current environment. However, it must be remembered that all of these efforts are voluntary. There are no guarantees that future owners and potential development will decide to ensure the perceived character of the ridge, sought by the opponents of this Alternative E2. – *Quarreling Views of the Ridge.* With respect to visual effects, the perspective of those who look at the area differs 180 degrees from those of us who look from within the area. Those who view the ridge from the urban area of Moscow believe the highway at the base of the ridge will diminish their view. Landowners from the area believe the view	

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			from alternative E2 will enhance the view to the west and be an attractive gateway to Moscow. – *Environmental Mitigations Required and Proposed*. The required and proposed mitigations to offset adverse environmental effects are nearly identical for all three routes as follows. C3 actually requires the most mitigation, including the only cultural heritage impacts. E2 has the largest wildlife impact associated with a stand of Civilian Conservation Corps (CCC) timber, planted in the 1930s, that may be habitat for three species of potential concern (bat, songbird and lizard). W4, incidentally, is the route that potentially most impacts the only endangered species found in the study area, and more CCC and earlier (1904) conservation tree plantings will be destroyed. The suggested mitigation summary shows W4 – 29 mitigations required, C3 - 30 mitigations required, and E2 - 29 mitigations required. Omission of Well on Snow Road Property. The DEIS does not show the well on our property at 1075 Snow Road, which was originally hand dug in 1877 and has been in the Idaho Department of Environmental Quality groundwater quality monitoring database for the last two decades. Thank you for your consideration in this important matter.	
L-26	Allison United States Department of the Interior	O'Brien Environmental Officer	See Comment Letter and Response for US Department of the Interior in Section 10.3 Agency Comment Responses	–

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	Office of Environmental Policy and Compliance			
L-27	Kas and Deborah	Dumroese	Adam Rush Public Involvement Coordinator ITD Office of Communications 3311 W. State Street Boise, ID 83707 – 22 February 2013 Dear Mr. Rush, Thank you for the opportunity to comment on the Draft Environmental Impact Statement concerning reconstruction of US-95 from Thorncreek Road to Moscow. Our comments are general and specific; they focus on three issues: safety, access, and environment. We look forward to the Department's responses. In section "ES.2 Purpose and Need" (p 2), the purpose is clear: *The purpose of this project is to improve public safety and increase highway capacity on US-95 south of Moscow…. On p 26, the need is clearly presented too: It [US-95] supports multiple local uses, including primary access to agricultural, residential, commercial, and industrial land located directly adjacent to the highway.* My first comment is that the purpose is to IMPROVE public safety, not maximize it. Safety should be neither trivialized nor overstated, and as I'll show, I believe the later is the case presented in this DEIS. ITD's engineers and designers have done an exemplary job of preparing routes with	The purpose and need for the project is to improve public safety and increase capacity within this section of US-95. While the purpose and need is not to maximize safety, it is ITD's Strategic highway Safety Plan is to maximize safety. The reference to 23 CFR 771 does call upon a balanced consideration of the needs for a safe and efficient transportation system. ITD and FHWA feel that the environmental impacts from the E-2 Alternative, with mitigation, are balanced and do not outweigh the significance of the safety and societal benefit of the project. See General Response Safety-6 regarding the significance of the differences between the safety of the alternatives. The responses below refer to the headers and numbers in your comment letter. Safety The Idaho Transportation Department's Office of Highway Safety reports that 53,899 crashes occurred in the State of Idaho in 2011 with the economic costs of the crashes equaling $2,166,493,801. ITD is committed to reducing the total number of crashes on its highways. ITD's Strategic Highway Safety Plan is "Towards Zero Deaths" and the vision of the plan is "Death and Injury Free Travel on Idaho Roadways During an Entire Year". One factor that will help ITD achieve this goal is by selecting the safest alternative proposed to replace the section of highway in District 2

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			extraordinary levels of safety—those achievements need not be buried under non-objective hyperbole. – Second, the need is to support multiple local uses. I believe that the two real choices for the new route (C-3 and E-2) offer drastically different end results in terms of the multiple local uses they support. According to 23 CFR 771 – FHWA Environmental Impact and Related Procedures, Sec. 771.105b, decisions should be made "…based upon a BALANCED CONSIDERATION of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement…" – SAFETY On p 38, the DEIS concludes that "*Any of the proposed Action Alternatives would reduce the projected crash rate for this segment of US-95 by more than 50 percent*", which clearly meets the purpose of the project to improve, not necessarily maximize, public safety. The main reason E-2 is the preferred alternative is safety. This appears to be the "trump" card in all discussions about route location – E-2 is declared the have "the greatest safety improvement" (p 15), achieved through shorter length, more four-lane distance, and minimized access points (p 15 & 178). LENGTH. Indeed, E-2 is 475 feet shorter (p 174). Using the predicted million vehicle miles (Appendix D in the Safety Technical Report) and route lengths (p 174), one can predicted the number of one-way	that currently has the highest crash rate and the most high crash locations. General Response Safety-6 explains the significance of the differences in length and safety between alternatives. Regarding four-lane distance, the predicted crash rates for rural US-95 on both the E-2 and C-3 alternatives is 1.1 crashes per mile per year as shown in Appendix C of the Safety Technical Report. The calculated 1.8 crashes per mile per year in your letter for the E-2 are not accurate. The C-3 Alternative has a much longer five-lane suburban section with a two-way left-turn lane that has residential and commercial approaches. The AASHTO Highway Safety Manual Analysis predicts a crash rate of 3.4 crashes per mile per year on the five-lane suburban section of the C-3 Alternative. Access points are considered in the Safety Analyses. The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See General Response Safety-3 for a summary of the Revised Safety Analysis. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. 1. ITD's Strategic Plan is clearly focused on maximizing public safety. No demarcation or thresholds exist between improving public safety and maximizing public safety; however, there would be 46 fewer total crashes and 9 fewer fatal and injury crashes with the E-2 Alternative compared to the C-3 Alternative over the 19-year design period, which is considered by ITD, FHWA to be a significant benefit in terms of lives and affected individuals and families. See General Response

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			"trips" made across each route per year. Using the predicted crashes estimates (p 173), one can divide "safe trips" (no crashes) by "total trips". This shows that the chance of traveling the length of C-3 safely during a year is 99.99951% compared to 99.99966% for E-2. That 1.5-in-a-million improvement with E-2 is about the same odds as an average person who also drives on E-2 also dying that year from the flu/pneumonia (www.cdc.gov). In other words, not very likely. FOUR-LANE DISTANCE. The Department estimates the four-lane portion of C-3 would average 1.1 crashes per centerline mile (p 178) compared to 1.8 for E-2 (calculated from data presented on p 173-174); 64% more crashes on E-2. True, C-3 has a longer urban section and 25 more access points than E-2 (p 135), which purportedly gives it a higher crash rate in that area, presumably because of turning traffic associated with access points (intersections). But is that argument valid? – ACCESS POINTS. Using the data for daily turns on and off the routes (2600 for C-3, 940 for E-2; Appendix D of the Safety Technical Report) and assuming ALL crashes occur at access points, the likelihood of having an accident per all turning events during a year on C-3 is 0.0011%, HALF that of E-2 (0.0022%). According to the DEIS, animals do not pose a sufficient risk to be included in crash predictions, but animals appear to be more important than access points. The DEIS indicates	Safety-6 regarding the significance of the differences between length and safety between alternatives. 2. When you refer to the "other method", we are assuming that you are referring to the safety analysis in Appendix D that is titled Thorncreek Road to Moscow Environmental Matrix Safety Analysis Alignments Carried Forward published on February 15, 2011. Please note the second to the last paragraph on Page 1 of the Safety Technical Report indicates that the US-95 Thorncreek Road to Moscow AASHTO Highway Safety Manual Analysis for Alignments Carried Forward (ITD 2012a), which is the basis for crash predictions in the DEIS, replaces the February 2011 report which is no longer applicable. No information from the February 2011 report was used in the DEIS. The Safety Analysis Technical Report for the DEIS (ITD, 2012a) and the Revised Safety Analysis Technical Report (ITD, 2013) both use the AASHTO Highway Safety Manual methodology to predict accidents on each alternative. See General Response Safety-7 regarding the methodology for the Safety Analyses. 3. Facts as well as assumptions were used to predict crash data for Thorncreek Road to Moscow. The following facts are used in the Highway Safety Manual equations The overall length of the E-2 Alternative is less than the C-3 Alternative. The length of the suburban section in the E-2 Alternative is shorter than the length of the suburban section of the C-3 Alternative. More accidents are predicted per mile in the suburban section than the rural section due to increased turning traffic, more

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			that more animals are likely near E-2 because of its proximity to Paradise Ridge (p 106), and IDFG's map in the Wildlife Technical Report shows E-2 traverses an ungulate impact zone not associated with routes further west. Thus, one could conclude that potential animal collisions would decrease on routes more distant from Paradise Ridge. Therefore, the 10-year data for the existing, most westward route compared with C-3 and E-2 (p 112) that shows 11% of crashes involved animals compared with 8% of crashes occurring at access points (and noting that the current route has the most access points of any route), suggests that E-2 may not be safer because access is limited. – 1. Please identify the demarcation between improving public safety and maximizing public safety? How are these thresholds defined? 2. Please explain/clarify how these alternative evaluations of safety, in terms of length, four-land distance, and access points are not valid and/or how they compare to the other method used to generate crash predictions. 3. Please clarify/identify the assumptions made for determining the crash data presented in Table 2. – In the DEIS, safety is defined solely in terms of predicted crash rates (Table 2, Table 51). These crash rates are undoubtedly based on a set of assumptions placed into the model. It is also quite likely that the model provides an estimate of variance around the means and generates	access points, narrower separation between the northbound and southbound directions, and a greater traffic volume, The E-2 Alternative has fewer residential and commercial approaches than the C-3 Alternative. The C-3 Alternative has five public road approaches and the E-2 Alternative has two public road approaches. The facts used in the crash estimates are easily quantified for each of the proposed alternatives selected and all are safety advantages for Alternative E2 over C3. The traffic predictions, their growth rates, and Crash Modification Factors are considered assumptions. Traffic predictions are included in Appendix C and E of the AASHTO Highway Safety Manual Analysis. The Crash Modification Factors as well as the calibration factor are included in Appendix E. Please notice that all three proposed Alternatives use exactly the same Crash Modification Factors for each highway type. If you change any of the Crash Modification Factors, the crash predictions on all three alignments will increase or decrease by about the same amount. 4. See General Response Safety-6 regarding the significance of the differences between alternatives. Confidence intervals or estimates of variance are not typically calculated with safety predictions made from the AASHTO Highway Safety Manual to analyze different proposed alignments, but in some instances it is possible to calculate confidence intervals. In the prediction of crashes on Thorncreek to Moscow, a confidence interval cannot be calculated because some

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			confidence intervals for the data presented in Table 2. – 4. Please share those confidence intervals / estimates of variance. Discuss whether those values overlap for C-3 and E-2 predictions, and if so, are the differences in predictions really significantly different? – This is particularly important because the DEIS indicates the new road from the Lewiston Hill to Thorncreek is held as the standard for safety (p 134). On that highway, ITD reports about 2 injury or fatality accidents per centerline mile (p 134). However, the predictions for either C-3 or E-2 (p 173-174) are only about one-third that of what is being seen in reality on the new highway. – 5. Please explain how the predictions for injury/fatality crashes on C-3 and E-2 are apparently so different than the observed injury/fatality crashes on the new roadway. Does this suggest that the models are poor predictors of crashes, or that the data used in the models is faulty? – In Table 30, 31 crashes involved animals (11% of total crashes), but on p 114, 37 crashes involving animals occurred in the project area. – 6. Please explain the discrepancy between vehicle-animal crashes along the existing route and within the project area.	of the crash modification factors do not have a standard error published with them. All of the crash modification factors used are widely accepted by committees who wrote the AASHTO Highway Safety Manual and generally have low standard error associated with them. Since Crash Modification Factors used in the analysis for all three proposed alternatives are the same for each alignment, the crash predictions for each of the alignments have significance. All three proposed action alternatives use the same crash modification factors for each highway type. The facts used in the crash estimates are easily quantified for each of the proposed alternatives selected and all are safety advantages for Alternative E2 over C3. If you change any of the assumptions, the crash predictions on all three alignments will increase or decrease by about the same amount. 5. You have indicated that the DEIS reports about two injury or fatal crashes per centerline mile from Lewiston Hill to Thorncreek Road on Page 134. Page 134 discusses maintenance energy, not crashes between the Lewiston Hill and Thorncreek Road. Two injury or fatal accidents per centerline mile on the newly constructed 4-lane section between the Lewiston Hill and Thorncreek Road is not accurate. At the public hearing, 0.38 fatal and injury crashes per centerline mile were reported between the Lewiston Hill and Thorncreek Road since the new highway was constructed. The AASHTO Highway Safety Manual Analysis predicts about 0.59 fatal and injury crashes per centerline mile. This suggests that construction of

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			– On p 171, the DEIS says that C-3 "*would not correct the curves and grade to the extent of E-2 or W-4. Therefore, it may be more difficult to spot wildlife and recover from potential wildlife collisions in some locations of C-3 compared to the other Action Alternatives.*" However, on p 175, the DEIS says "*The improvements to the roadway curvature and grade as well as the wider typical section, would improve the ability for drivers to spot wildlife and maneuver if wildlife enter the roadway."* – 7. Given that all Action Alternatives meet AASHTO for grades and curves, please explain the apparent discrepancy in the purported risk of vehicles hitting animals due to road design features. On p 204, the DEIS concludes *"…safety between Action Alternatives does not differ substantially*." 8. Please explain the contradiction between this statement and the repeated statements in the DEIS that E-2 is "safer". ACCESS A repeated argument for E-2 is that it limits access points. This is justified on the argument that fewer access points equals "more safety", but as seen above, this argument, given the exemplary job of ITD designers and engineers in preparing routes with extraordinary levels of safety, appears to be overstated. Please recall that purpose of the project is to improve safety, not maximize it. In addition to safety, the DEIS incorporates the	a new four-lane divided section between Thorncreek Road and Moscow would have fewer crashes than predictions from the AASHTO Highway Safety Manual Analysis; however the proposed horizontal and vertical alignment will be slightly different between Thorncreek Road and Moscow than the newly constructed four-lane section from the Lewiston Hill to Thorncreek Road. The differences in horizontal and vertical alignment between the Lewiston Hill and Thorncreek Road and Thorncreek Road to Moscow may lead to a slightly different crash rate prediction. In our judgment, the difference in crash rates between observed data from Lewiston Hill to Thorncreek Road and predicted data between Thorncreek Road and Moscow appear reasonable. 6. The total animal crashes on the Chart on Table 30 are correct. The total animal crashes listed within the project area in the DEIS page 114 was corrected in the respective paragraph in the FEIS Section 3.10.3. 7. See General Response Safety-2 for an explanation of how wildlife crashes were considered in the Safety Analyses. Sight distance is typically greater on roadway sections that are straight than on roadway sections with a curve even if the roadway is built to AASHTO Standards. Also, sight distance is greater on flat curves than sharp curves. The referenced section in the DEIS page 171 has been clarified in the FEIS Section 3.10. The existing alignment does not meet AASHTO standards for curvature; therefore, sight distance on any of the action alternatives will be greater than the existing alignment. 8. The reference sentence in the DEIS page 204 was

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			language of the Latah County Comprehensive Plan (p 71) to justify reducing access points on the NEW alignments. 9. Please clarify whether the County Commissioners and spirit of the plan is to reduce current access of county citizens to US 95, or, whether the spirit of the law is to limit new access points as it pertains to new commercial and residential development. On p 140, *"C-3 would improve the safety of US-95 and improve the highway access for all users but to a lesser extent compared to the E-2 and W-4 alternatives."* 10. Please clarify/explain how residents of Woodland Heights, Cameron Road, Zeitler Road, Snow Road, Jackshaw Road, and Hidden Village/ Benson's / Eid Road have improved access, particularly in terms of distance driven, to US-95 if E-2 is built, and compare that to the distances traveled if C-3 is constructed. 11. For residents of Woodland Heights, Cameron Road, Snow Road, and Zeitler Road, describe this improvement as it pertains to southbound travel on US-95. For residents of Hidden Village/ Benson's / Eid Road, describe this improvement as it pertains to northbound travel on US-95. 12. What data exists that residents of Hidden Village/ Benson's / Eid Road would travel to Moscow via E-2, considering they would have to backtrack south a mile up the dangerous Reisenauer Hill? 13. Please clarify the configuration of mobile homes	revised in the FEIS. Access 9. ITD has no jurisdiction over Latah County Comprehensive Planning. ITD has jurisdiction over state highways and access control policies. All three routes will be subject to the same level of access control as described in General Response Access. 10. ITD does not anticipate a substantial difference between the E-2 and C-3 Alternative in this distance traveled or access, however, the travel on both the existing US-95 loop, the new US-95, and accesses onto the new US-95 will be safer. See General Response Safety-3 regarding how the safety of existing US-95 was considered in the Revised Safety Analysis (ITD 2013). 11. Existing US-95 will perform as a local collector to provide access to both the north and south intersections of the new US-95. 12. No data exists. ITD anticipates travelers will utilize the closest access. Residents along Eid Road are expected to continue to utilize the existing US-95, which would have lower predicted crashes due to the lower traffic volumes. 13. See FEIS Section 4.1 for the clarification. 14. The safety of the accesses onto US-95 from the existing US-95 would be improved for the residents on Eid Road that remain; however, there would be no improvements to the access from Eid Road onto existing US-95 unless negotiated with LCHD. However, crashes are expected to decrease due to the lower traffic volumes using the existing US-95 loop as evaluated in the Revised Safety Analysis. See General Responses Maintenance-1, Maintenance-2 and Safety-

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			in Benson Park (p 140). – The first paragraph on p 141: *E-2 would benefit park residents by improving the safety of US-95 and improving highway access and mobility. Construction of additional travel lanes would improve the roadway's level of service, reducing commute times and facilitating more efficient access to services. Ingress and egress of vehicles, including emergency response units, would be enhanced by the use of a turn bay. Hidden Village and Benson Park residents would still be able to access existing US-95 approximately one mile south of Eid Road.* – 14. Please clarify/explain again how access is improved (in terms of distances and commute times) with an E-2 route versus a C-3 alignment for Hidden Village/ Benson's / Eid Road, especially when all residents of the Benson Park are displaced. 15. Please clarify/explain the implications for first responders to residences within the project area under a C-3 or E-2 alignment, particularly given this statement in 4.10.4 Emergency Response Time (p 177): *The C-3 Alternative would provide the most convenient access and best emergency response times to the populations on the existing US-95.* 16. Please clarify/explain exactly how that second sentence of the first paragraph on p 141 benefits park residents in their daily commute. 17. Please provide data that the increase in travel distance is realized in reduced commute times and	3. Also see responses to comments #10 and #11. 15. ITD anticipates responder times will remain the same for residences located off current US 95 and that the first responders will benefit from the improved safety of the new alignment as well as the reduced traffic volumes on the existing US-95 loop. Response times will improve for those in outlying areas to the south of Reisenauer Hill. See FEIS Section 4.10 for additional clarification. 16. Commuting would be enhanced by improving the safety of the new US-95 and access points from the existing US-95 loop onto the new US-95. The crash rates on the existing US-95 loop will also be reduced due to the decreased traffic volumes as described in General Response Safety-3. 17. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). The description of travel times in relation to park residence has been revised in the FEIS Section 4.2. 18. The residents will realize the benefit of improved safety when utilizing this section of US-95, regardless if they still live in the project boundaries. Environment FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. 19. Additional information regarding the loss of tax base as a result of the alternatives has been added to FEIS Section 4.1, Socio-economic and Environmental

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			in reduced overall cost to park residents. – And finally, on p 142, "*The E-2 Alternative would improve the safety and capacity of US-95 for all users including residents of the [Benson] mobile home park.*" – 18. Please clarify/explain how these residents, displaced by construction of E-2, realize improved safety in a tangible way. – ENVIRONMENT To reiterate, the purpose of the new road is to improve, not necessarily maximize, safety. FARMING IMPACTS. Contrary to the claims of *The Citizens for a Safe Highway 95,* C-3 has, compared to E-2, the most benign effect on farming. E-2 would convert 55% more total land, 100% more prime farm land, 36% more farmland of state importance, almost 500% more land currently being protected from erosion by the Conservation Reserve Program, and double the number of farming operations of 20 acres or less (Table 42; p 147-148). LOSS OF LAND FROM THE TAX BASE. E-2 removes 34% more land from the Latah County tax base through new right-of-way acquisitions. 19. This point about taxes should be made somewhere in the FEIS. IMPACTS ON ANIMALS, PLANTS, WATER, AND PEOPLE. Except for linear feet of tributaries affected, E-2 has	Justice Effects. 20. The discrepancy of wetland impact indicated in your letter (4.9 acres vs. 3.61 acres) compared the DEIS page 13 to a draft Wetland Functional Assessment report (Gilmore 2006) that was circulated as a draft for review in 2006 but was never finalized and was not part of the DEIS or DEIS Technical Reports that were circulated for public comment. Instead the functional assessment and wetland delineation information was combined into one report titled Wetland Delineation Technical Report (Gilmore 2012), which was provided as a Technical Report to the DEIS during the recent public comment period. This 2012 report (Gilmore 2012) does not include impact calculations. Wetland impact calculations are only included in the DEIS narrative; therefore, the 3.61 acres of wetland impacts for the E-2 Alternative which was stated on page 13 of the DEIS is correct. Please do not consider the draft Wetland Functional Assessment report (Gilmore 2006) as part of the DEIS submission. 21. See General Response Weeds for information regarding effects to Palouse grasslands and rare vegetation. The referenced statement is in a Section of the DEIS that discusses the early screening of alternatives. The E-3 Alternative intercepted and would have had direct effects on two remnants of value 2; The E-1 Alternative intercepted two remnants of value 2 and 4; and the E-2 Alternative adjoined one remnant of value 2, but the footprint is 50 ft. away and does not directly affect it. The referenced statement was modified to state that the E-2 Alternative would not "directly" affect rare plant communities. See FEIS

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			more direct and indirect, short-term and long-term effect on rare plants, rare ecosystems, sensitive wildlife species, ungulates, domestic wells, water percolation, spread of weeds, wetlands etc. than C-3. It is not clear why Table 1, p 13 shows 3.61 acres of wetlands affected by E-2, but Gilmore's Wetlands Functional Assessment shows indicates 4.9 acres. – 20. Please explain/clarify the different acreages presented for wetlands affected. On p 45, Eastern Corridor, the second paragraph erroneously states that E-2 was the only eastern alternative to not affect rare plant communities. 21. Please amend this sentence to show that E-2 has the greatest impact on rare plant communities. It is not just the Idaho Natural Heritage Program that considers the Palouse Grasslands an endangered ecosystem (p 96-97). 22. Please amend this sentence to show the other agencies (e.g., USFWS) that also consider this ecosystem critically endangered. Only E-2 affects palustrine scrub-shrub wetlands (p 155). These PSS wetlands have, for all practical purposes, "old-growth" canopies of Crataegus douglasii. This slow-growing shrub is also important for many bird species protected under the Migratory Bird Treaty Act (MBTA). 23. Given the importance of this wetland type to species NOW and the decades required to grow new PSS, please explain how any mitigation other than avoidance is realistically feasible.	Section 2.5.2 Screen Alternatives, Eastern Corridor. The DEIS and the FEIS both disclose that the E-2 Alternative would have the greatest indirect effect to rare plant restoration efforts compared to the alternatives evaluated in detail in the DEIS (DEIS page 167) because it would be closer to planned and ongoing restoration efforts compared to the other Action Alternatives and could result in weed establishment and spread. 22. This clarification has been made in the FEIS Section 3.8.3. 23. ITD has already completed the Cow Creek Mitigation site that would replace any wetland functions and values that are impacted by the project. In addition, any remaining mitigation requirements would be provided at a greater than 1:1.5 ratio depending on the functions and values impacted, to compensate for the temporal loss. The mitigation site converted approximately 11.5 acres of eroded stream channel to a higher functioning wetland for water quality, hydrologic function and habitat function. See FEIS Chapter 9, Environmental Commitments and the Conceptual Wetland Mitigation Plan for additional detail regarding mitigation for wetland impacts. 24. The referenced statement has been corrected and rephrased in the FEIS. 25. The statement was corrected to state: "The remaining Palouse grassland remnants continue to be threatened by weed invasion and residential development". See FEIS Chapter 6, Indirect and Cumulative Effects for additional information. 26. See FEIS Section 3.8 for clarification and additional

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			With all due respect, Section 6.2.3, Cumulative Effects to Resources, is the weakest section of the DEIS. On p 210 and 216, the DEIS asserts, I presume, European settlement of the Palouse "in the early 1800s", remarkable in that Lewis and Clark did not visit Idaho until 1804 and that the most significant conversions of Palouse Prairie occurred from about 1880 through 1920 (Tisdale 1961). 24. Please rewrite this sentence using some data, not a best guess. 25. On p 210, this statement "*remaining Palouse remnants continue to be eliminated through conversion to cropland*" is not accurate according to Tisdale (NW Science, 1961) and Daubenmire (Ecology, 1940). Please amend. Along that same line, on p 97 (Palouse Grassland Remnants) the second paragraph lacks clarity. "*There are many areas of remnant patches of grassland that do not constitute part of the Palouse Grasslands ecosystem and were not considered Palouse remnants. This was because they are actively cultivated agricultural land or they have been converted to Conservation Reserve Program (CRP) lands. These lands contain limited grass species including; (sic) bluebunch wheatgrass, …"* 26. This section needs to be rewritten to clearly state that there are other grasslands on Paradise Ridge, but they are not remnants of Palouse Grasslands because they are CRP or other stands on formerly cultivated (and hence, converted from Palouse Grassland) fields.	information regarding of Palouse Grasslands. 27. The statement that you mentioned has been revised to state that the primary grasses on CRP lands were Thinopyrum ponticum (Agropyron elongatum; tall wheatgrass), Thinopyrum intermedium (Agropyron intermedium; intermediate wheatgrass), and Arrhenatherum elatius (tall oatgrass), all non-natives. 28. The statement was deleted. 29. Information regarding isolation and gene flow of Palouse remnants and specific species has been clarified in the FEIS Section 3.8 and 4.8. 30. The statements are not related and have been clarified in the FEIS Section 6.2.3. 31. See General Response Wildlife and FEIS Section 3.2.3 regarding the development on Paradise Ridge. 32. See General Response Weeds-1 and FEIS Section 3.2.3 for additional information regarding development on Paradise Ridge. 33. The statement refers to future actions in the reasonably foreseeable future as part of the cumulative effect discussion. However, IDFG has relocated four moose this year from the Moscow area as described in the FEIS Section 3.8. The statement has been clarified in the FEIS Section 3.2.3. 34. The wildlife discussed in the DEIS was based on the concerns expressed by Idaho Fish and Game, the US Fish and Wildlife Service and the Wildlife Biologists who reviewed the project. The list of species assessed included reptiles, amphibians, birds, mammals, insects and other invertebrates. It also included potential threatened or endangered species, including the potential for downstream effects on steelhead (fish). It

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			27. Please provide some data that any CRP ground on or around Paradise Ridge is planted with native bluebunch wheatgrass. 28. Please substantiate the statement on p 211 that "*Because of their isolation, gene flow is restricted, which may contribute to reduced genetic diversity and fitness of the populations."* Given the amount of work being done at the University of Idaho, the DEIS should have been able to justify definitive statements on this topic. In addition, the DEIS should have explored the difference in genetic diversity and gene flow of a particular species (e.g., Pygmy Nuthatch or Palouse thistle), as well as the genetic diversity and gene flow with the community of species within a Palouse Prairie remnant. 29. This topic must be more clearly and accurately presented in the FEIS. 30. Please clarify if these two statements on p 211 are correlated: *The number of homes in the wooded areas and areas on or near Paradise Ridge continues to increase. The continual elimination of trees and shrubs that provide suitable cover for browsing ungulates and general wildlife has degraded the availability of quality habitat in the project area*. 31. If the intent is to suggest that home building on Paradise Ridge has reduced tree/shrub habitat on Paradise Ridge, then please provide some data that shows (1) homes have reduced shrub/forested cover on the Ridge and (2) homeowners have not reforested large areas of the Ridge. Both could be documented through historical air photos and more	included Idaho Species of Special Concern, which are based on IDFG priorities. The project effects discussed focus on those species that are at a higher risk to be significantly impacted and those identified by agencies to be of greatest concern and those species with special legal status. It is believed that the project effects are adequately portrayed based on the wide range of species described. This approach is holistic in that it addresses a wide spectrum of wildlife species present, not just ungulates. 35. The statement came from page 11 of the report titled Biological Evaluation on the Long-eared myotis and Pygmy nuthatch (December 2005) (ITD, 2005) prepared by Dr. Melquist. Dr. Melquist made his observations after reviewing the site and was based on his professional judgment. 36. Dr. Melquist, who was the statewide Endangered Species and Nongame Program Manager for many years with Idaho Department Fish and Game, provided the pygmy nuthatch biological background, assessment of habitat and effects analysis for the Thorncreek to Moscow Project. See Biological Evaluation on the Long-eared myotis and Pygmy nuthatch (December 2005) (ITD, 2005). As discussed, E-2 would affect the 3.9 acres of pine forest. Some trees will be removed and there will be some indirect impacts to habitat in the stand due to noise and disturbance. These impacts are included in the DEIS Environmental Consequences (page 169). Additional information has been added to the FEIS Section 4.8 regarding potential noise effects to birds and other wildlife.

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			recent satellite imaging. In addition, please synthesize this section with the information about Palouse Prairie restoration found on p 167. Future Effects (p 211). The first two paragraphs of this section cannot, in my opinion, be justified. 32. If they can be justified, then please do so with citations or data, not opinions. One could counter argue that development on Paradise Ridge has reduced habitat loss and decreased fragmentation because new landowners have built homes on former farm ground and reconnected existing remnant vegetation by planting native and non-native vegetation, and through extensive reforestation have improved ecosystem function and improved habitat for a wider diversity of wildlife. 33. Please cite examples of moose relocation from Paradise Ridge, or from any urban/wildland interface in Latah County to justify the speculation about moose-resident interactions. Cumulative Effect (p 212). This sentence "*Many of the wildlife species that would occur in the project area are non-native species and habitat generalist species like raccoon, white-tailed deer and a variety of other common species*" shows a surprising level of ignorance of the fauna of Paradise Ridge. More than 140 species of birds have been recorded at 1096 Eid Road, and of those only about 6 are non-native. How many native species of insects, especially beetles and pollinators, occur in Palouse Prairie remnants? Of the larger fauna, bobcat, cougar, moose, elk, white-tailed deer, mule deer,	37. The sentence is changed to "Additional suitable habitat is available nearby at Paradise Ridge and throughout Northern Idaho. There are several mitigation measures that would mitigate for the loss of the 3.9 acres of pine stand including nest boxes that will be installed per Dr. Melquist's recommendation. Any necessary tree felling will occur outside of the breeding period. See FEIS Chapter 9, Environmental Commitments for additional mitigation measures. Indirect effects are considered in the DEIS and FEIS Section 6.1. 38. Additional detail regarding the effects of highway noise on the pine stands and the resulting effects to pygmy nuthatch has been added to the FEIS Section 4.8. Based on the analysis, the remaining stands will be large enough to support pygmy nuthatch but there could be fragmentation of the habitat due to tree removal. The effects of noise on birds vary with traffic volume, speed, wildlife species and habitats. The study that you referenced (Foreman, 2000) has useful information regarding the effects of busy roads on wildlife. The study indicated that traffic noise from busy roadways could affect bird communication for grassland birds. However, it must be recognized that the study was based on a road with between 45,000 vehicles per day to 150,000 vehicles per day, which is between 5 and 18 times greater than the Thorncreek Road to Moscow project. The study also did not measure the noise levels. Based on FHWA noise tables, traffic volumes and their predicted noise levels for the studied roadway are much higher than the predicted levels for

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			badger, coyote, tree frogs, toads, and salamanders are all native wildlife species. 34. The preceding section should be rewritten to truly represent the diverse native fauna that occur on Paradise Ridge and that wildlife diversity compared to that found in cultivated farmland. Please explain/clarify why any discussion of "wildlife" focuses almost exclusively on ungulates and species of concerns, rather than a more holistic definition. One of those 140 species of birds is the Pygmy Nuthatch. On p 169 the sentence says that the pine stand "could offer potential nesting habitat" for this nuthatch, but the Melquist technical report clearly states that this species is known to nest in this stand. 35. Please explain/clarify this discrepancy (on p 166 and 169) about Pygmy Nuthatches breeding in the pine stand. In addition, the statement "*this pine stand is small with ten snags and only four mature pine trees suitable for pygmy nuthatch nesting habitat*" is not accurate. Please come out and take a walk. 36. This sentence should be modified to show what the necessary habitat requirements are for nesting Pygmy Nuthatches, especially given Burleigh's (Birds of Idaho, 1972) conclusion that this species is one "*whose habitat requirements in Idaho are so exacting" that "I have never at any time observed any tendency on the part of the small flocks to leave the areas they show such a liking for*." 37. Given Burleigh's appraisal, please explain/clarify	the existing corridor. In a more recent Massachusetts (USA) study by the same author (Foreman, et al, 2003), highways with moderate traffic volume (8,000-15,000 ADT) had no effect on bird presence, although breeding was affected for 400 meters. For relatively light traffic volume (3,000-8,000 ADT) there was no significant effect on grassland bird distribution. This study of the light traffic volumes is more comparable to this project than the study of the high volume roadway. Additional information regarding the potential effects of traffic noise has been incorporated into the FEIS Section 4.8. Additional detail regarding the E-2 Alternative's effects on the pine stand and the effects to pygmy nuthatch is also included in the DEIS and FEIS Section 4.8. 39. Additional information regarding loss of the pine stand and possible noise effects has been added to the FEIS Section 4.8. See Response to question 38 above. 40. General Response Displacement-1 offers clarification regarding residential and business impacts. 41. General Response Displacement-1 offers clarification regarding residential and business impacts. 42. General Response Displacement-1 offers clarification regarding residential and business impacts. 43. The width and grade of the C-3 Alternative would be different than the existing conditions. See FEIS Section 4.11 regarding visual effects. 44. ITD has considered the view of City of Moscow and also considered how the project would tie into the future planned Ring Road concept, further recreational site, future development and other considerations. Additional information regarding these topics and

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			how "*the loss of this habitat is considered minor and there is an abundance of suitable habitat nearby at Paradise Ridge*." 38. Please also explain/clarify the potential impacts of highway noise on the breeding success of birds, and to what distance that noise is critical. 39. Then, please explain/clarify whether the actual loss of 3.9 acres of pine forest represents the real loss in terms of suitable habitat otherwise disrupted by noise. This section on p 138 describing C-3 displacements appears incorrect: "*C-3 would displace seven residences. Six are houses and one is mobile home in the Hidden Village Mobile Home Park. Approximately two acres of the mobile home park property would be affected*." 40. Please explain/clarify how C-3, built on the current roadway footprint that avoids Hidden Village, would cause displacement of six houses and one mobile home in Hidden Village. 41. Please clarify/explain how 2 acres of Hidden Village are affected by C-3. 42. These explanations/clarifications should be extended to p 140, where these statements are made again, and where the number of displaced mobile homes is different than that given on line 138. On p 180, section 4.11.1 Visual Quality Assessment Findings, the DEIS states that C-3 generated, negative visual effects "*would occur near South Clyde Road, Zeitler Road, and near Eid Road. This would affect the residential and recreation*	consistency with the City of Moscow Transportation and Comprehensive Plans has been added to the FEIS Sections 3.2 and 4.2. 45. The alternatives were designed based on a 20-year design period factoring in the forecasted growth of population and traffic. The alternatives also consider how the project will be consistent with future public transportation projects such as the Ring Road project. See the FEIS Chapter 3.2 and 4.2. 46. The referenced statement regarding topography has been clarified in the alternative descriptions in the FEIS. The E-2 Alternative was forwarded for detailed analysis in the DEIS because it would avoid impacting rare plant populations, a historic site and would have less wetland effects compared to the E-1 and E-3 Alternatives. See The DEIS Section 2.5.2. 47. The referenced project is a separate project. The production of Spalding's Catchfly seed was successful and was turned over to the PCEI and USFWS for transplanting. However, the landowner had decided not to allow the plantings on his property. 47. Cuts and fills will be minimized as practicable during the design process. This will be based upon more detailed geotechnical and detailed survey data. While it is not likely that the roadway cuts and slopes will be totally weed free, ITD has a commitment to establish at least 70 percent cover through erosion control seeding per the Construction General Permit (CGP). If coverage is insufficient, ITD is required to reseed until there is at least 70 percent erosion control vegetative cover established. Weeds would not be

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			viewpoints located near the alignment, particularly the residences along Eid Road…" 43. Please explain/clarify how C-3 would cause more negative views for residences of Eid Road given that the current alignment, on which C-3 would rest for its transit near Eid Road, is currently not visible by residents of Eid Road. FINAL ODDS AND ENDS. On p 143, "*C-3 is viewed by the City of Moscow as the most consistent with land use goals…" and "E-2 would present challenges for future connectivity to the planned Ring Road Project. However, the project is conceptual and currently unfunded.*" 44. Please clarify/explain why the City of Moscow viewpoint has seemingly little effect on the selection process. 45. Please explain/clarify why thinking about future transportation needs and their organization on the landscape is not a prudent part of selecting the Action Alternative. On p 34 the project area "*represents a change in topography from rolling hills to more mountainous terrain" but on p 106 both the central and eastern corridors are "characterized by rolling topography.*" 46. Please clarify which is the more accurate statement. IDFG, USFWS, and EPA all unequivocally state opposition to E-2. They all unequivocally state that the best mitigation for environmental impacts is to first AVOID the natural values and functions, and if they cannot be avoided, to then minimize the	included in the calculation of 70 percent cover. See FEIS Chapter 9, Environmental Commitments. ITD will also establish a Weed Inventory and Control Plan and a Vegetation Management Plan that will include funds for biological, chemical and physical control of weeds, monitoring and establishing perennial native vegetation. 48. The Cow Creek Mitigation site was approved by USACE in August 2010. It was determined by the USACE to have successfully achieved the success criteria for replacing wetland functions and values and is considered by the USACE as effective. In addition, because the mitigation site has already been created, there is no temporal loss. More than 80 percent of the planted vegetation was successfully established. 49. See response to 48. The Cow Creek Mitigation Site is located within the same watershed and would replace the impacted ecosystem functions. 50. In 2010 the cow creek mitigation site was signed off with less than 20 percent of non-native species present. ITD is required to control noxious weeds on their construction projects and right-of-way and strives to meet this requirement through a number of maintenance activities and through standard operating procedures. The ITD is required to have a greater than 70 percent coverage on seeded areas and the Lewiston site has met those requirements. The Cow Creek mitigation site had an 80 percent survival rate for native plants with less than 20 percent non-native invasive species present. Additional information regarding BMPs, standard specifications and mitigation measures for weed control is in FEIS Chapter 9,

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			effects. The significant environmental impacts of E-2 can be avoided by choosing C-3, which, compared to E-2, minimizes environmental impacts. • If the Department believes the extensive environmental impacts of E-2 can be mitigated, than the Department should provide data on how successful their seeding and transplanting mitigations were on the Lewiston Hill to Thorncreek segment. Specifically: 47. Specifically, on seeded cut and fill slopes, how effective was the establishment of desired vegetation vs. occurrence of non-desired and invasive species? 48. How effective is the wetland mitigation at Cow Creek? 49. How effective is the wetland mitigation in terms of restoring ecosystem function? 50. What is the percentage cover of desired species versus non-desired species on roadsides and at Cow Creek? 51. Given the growth rates of woody species at Cow Creek, how long would it take to mitigate the PSS wetlands removed by E-2? Given that "*The primary threat to the persistence of Palouse remnants in their present state is colonization be weeds*" (p 97), the lack of discussion on weeds vs. reseeding success is an egregious omission. – DISPLACEMENTS 52. Please provide additional data on the "displacements" of both routes. It is not clear what	Environmental Commitments 51. The mitigation site is already established and took approximately 5 years (2005 to 2010) from the first planting to USACE approval. The Initial plantings of the Cow Creek Wetland Mitigation area consisted of 1400 trees, 20,500 shrubs, 4,400 willow stakes, and 34,500 wetland species plugs. In addition, the Contractor replaced dead trees and shrubs in 2007. This includes approximately 3.8 acres of PSS wetland. The mitigation for wetland impacts will adequately compensate for the alternatives' wetland impacts and meet the requirements of 33 CFR 325 and 332. 52. Please see General Response Displacement-1 and see FEIS Section 4.1, Socio-economic and Environmental Justice Effects for reevaluation and clarification of the residential and business impacts. The impacts are based on conceptual level detail. Actual displacements will not be known until the design process when geotechnical and detailed survey data is available. 53. A business was determined based on businesses registered with the Idaho Secretary of State and supplemented with windshield surveys. The business impacts were updated as described in General Response Displacement-1. CONCLUSIONS FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The significances of the differences in safety between

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			homes and businesses are displaced. 53. It is also not clear what constitutes a business. – FAIRNESS AND ASSUMPTION OF RISK. People who purchase homes adjacent to federal highways must assume that changes in the highway can affect them. People who place their businesses adjacent to federal highways do so for enhanced visibility of their concern to the general public, and do so accepting the risk (short-term and long-term) associated with changes to the highway. People who purchase homes a mile or so from federal highways assume existence free of highway impacts. CONCLUSIONS Thank you for the opportunity to comment on the DEIS. The purpose of the project is to improve, not maximize, public safety. C-3 and E-2 both satisfy the purpose and need of the project. C-3 and E-2, because of the efforts of ITD designers and engineers, have an extraordinary level of safety. This safety, when looked at using various methods, suggests both route are equally safe. C-3 provides safe access to more citizens of the project area than E-2, as well as providing increased safety in terms of first responder access. C-3 is preferred by the City of Moscow. E-2 has the greatest negative impacts on rare plants and animals, rare plant communities, wetlands, and farmland and ability to cultivate the land, removes	alternatives are addressed in General Response Safety-6. The differences in access, mobility and travel user costs between alternatives are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). The City of Moscow supports any of the action alternatives and safety improvement. Any of the action alternatives would be consistent with their land use plans; however, the C-3 Alternative would be the least consistent because the longer 5 lane section could increase traffic and growth on the north end of the project. This is clarified in the FEIS Section 4.2. Regarding the E-2 Alternatives' effects to the environment, See General Response Weeds and Wildlife regarding indirect effects to plants and Paradise Ridge. –

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			the most land from the Latah County tax base, and is the least desirable route for Idaho Department of Fish and Game, US Fish and Wildlife Service, and the US Environmental Protection Agency. These agencies note the best mitigation is to avoid environmental impacts to begin with. – Costs between E-2 and C-3 are similar. E-2 is a "have your cake" alternative because it excludes most residents of the project area from accessing US 95 from Thorncreek to Moscow in a realistic, useful way, and it does so by inflicting the most environmental impacts on farmland and wildland with the project area. C-3 is a "have your cake and eat it too" alternative because it meets the purpose (improves safety to an extraordinary level by any standard) but does so by still allowing most residents of the project area direct access to the new roadway, recycles more of the existing highway footprint, and has a markedly lower impact on the environment. Respectfully submitted, Kas and Deborah Dumroese Moscow, Idaho	
L-28	Linda United States Environmental Protection Agency Region 10	Anderson-Carnahan	See Comment Letters and Response for the EPA in Section 10.3 Agency Comment Responses.	–
L-29	David	Hall	March 25, 2013 Adam Rush, Public Involvement Coordinator	Figure 4. E2 route with 0.6 miles (yellow) buffer showing potential weed effect on prairie remnants

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			Idaho Transportation Department Headquarters P.O. Box 7129 Boise, ID 83707-1129 comments@itd.idaho.gov The Idaho Transportation Department obviously has come into the Draft Environmental Impact Statement process with the E2 alignment as their preferred alternative for external reasons and it has tried to justify that choice by obfuscation[1], magnifying small differences[2] and minimizing larger differences,[3] "driving" the technical studies[4], misapplying the findings from the technical reports, and ignoring contrary direction from resource agencies and governing regulations[5]. This is unacceptable. In this Draft Environmental Impact Statement, ITD has identified and planned three safe alignments. Ideally, it seems that ITD should build along the current alignment with a less disruptive design and a narrower footprint than those offered in the DEIS. Perhaps send truckers up US 95 [UI class project, letter to the editor] to keep them out of downtown Moscow. But, as that is probably not a realistic option at this point (it is neither one of the alternatives, nor a combination of the alternatives, in the DEIS), ITD must select alignment C3. And ITD must look seriously at avoiding displacement of any residences along C3. The policy of the Federal Highway Administration is to take the least new right of way and maximize the use of existing infrastructure. E2 takes 207 acres of	(red). General comments: FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. Footnote#1: General Response Displacement-1 offers clarification regarding residential and business impacts. Footnote#2: General Response Safety-6 explains the significance of the differences in length and safety between alternatives. Footnote#3: The amount of wetland impacts is accurate and described in the DEIS Section 4.8. Footnote#4: The rationale for conducting multiple wildlife studies is explained in the FEIS Section 3.8. Footnote#5: General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. Building along the current alignment with a less disruptive design and a narrower footprint: The typical section for the action alternatives include key design elements meant to address the identified deficiencies of the roadway. These include, two lanes in each direction, a 34-foot median, 6 to 8 foot shoulders, sidewalks in urban sections, stormwater treatment areas, and a clear zone. See the DEIS and FEIS Section 2.4.2 for additional detail regarding these elements. See General Response Safety-4 regarding making small improvements along the existing alignment. ITD reevaluated the residential and business impacts as a result of the alternatives as described in General

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			right of way; C3 takes 154 acres and reuses the most miles of the existing highway. (They also have "Eco-Logical, An ecosystem approach to developing infrastructure projects" – did ITD consider that approach?) According to ITD right-of-way staff, E2 will likely take out an entire mobile home park and one house. C3 and W4 will each take out one residence. None of the alternatives will displace any businesses. Or maybe not; see below. The U.S. Environmental Protection Agency policy is to make the least impact on the environment. E2 would have by far the greatest detrimental environmental affects – much greater than those of C3. "The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge which provides moderate ungulate habitat and E-2 would also affect pine stands that are potential long-eared myotis, northern alligator lizard and pygmy nuthatch habitat." [DEIS p. 55] "Closer to the base" is not correct – it would be located above the base of the ridge. _____ 1 Varying numbers and unclear meaning of 'displaced' for residences and businesses 2 "E2" is shorter!! – by nine one hundredths of a mile, by your estimate 3 Amount of wetlands affected 4 "Shopping" for the desired answer for wildlife studies 5 The resource agencies all are against alignment E2	Response Displacment-1. FHWA does not have a specific policy to take the least right-of-way and maximize the use of existing infrastructure. However, these are considerations in the design process. Eco-logical is a guidance principle but is not a regulation. The project purpose and need must be met and the alternatives' effects to human and natural resources must be considered in the decision making process. See General Response Agency regarding the difference in opinions regarding ITD and FHWA's Preferred Alternative. See General Response Weeds and Wildlife regarding the indirect effects of the alternatives on Palouse remnants including Paradise Ridge. See General Response Safety-2 regarding increased potential for wildlife collisions for the E-2 Alternative and how wildlife collisions were addressed in the Safety Analyses. While wetlands may play an important role in flood control, the E-2 Alternative would not affect any wetlands critical for flood control or any 100-year floodplain. The giant Palouse earthworm is known to occur in the area and additional information regarding documented occurrences and habitat have been added to the FEIS Section 3.8. According to USFWS [76 FR 44547 44564] there is little known regarding the distribution or habitat needs for the species but it is believed to be more variable than originally thought. To date, there is no designated critical habitat for the species. See General Response Wildlife for additional information

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			E2 would cause major impact to Palouse prairie, noted by the U.S. Geological Survey as being one of the most endangered terrestrial ecosystems in the U.S. There are 24 Palouse prairie remnants within 1 km distance from E2, C3 has 14 remnants within 1 km distance. Many of the E2 remnants are very close to the proposed route and are of higher quality than are those along C3. E2 would bisect a proposed prairie restoration site contiguous with the extremely significant Paradise Ridge prairie remnant. E2 would have a much greater detrimental effect on the endangered Palouse Prairie Ecosystem than would C3. E2 would have the most impact on ungulates. ("…the eastern alternative posed the largest concern for big game among the 3 alternatives being considered.."); E2 passes through marginal to moderate ungulate habitat. C3 passes through poor to marginal ungulate habitat. E2 affects 4.4 acres of moderate ungulate habitat; C3 affects 0 acres. Better habitat (E2) will have more ungulates and could increase the likelihood of vehicle-ungulate collisions. E2 would affect more than twice the acreage of wetlands as C3. This is significant in terms of wildlife habitat and also flood control, in which wetlands play a significant role. C-3 would have the least effect on wetlands. E2 would impact 4 acres of pine stands; C3 impacts none. E2 will destroy this habitat for the northern alligator lizard, pygmy nuthatch and long eared myotis.	regarding the giant Palouse earthworm. See General Response Agency regarding the disagreement regarding ITD's Preferred Alternative. The text quoted from the USDOT Act of 1966 referring to prudent and feasible measures applies to Section 4(f) properties, which includes National Register eligible cultural resources, publicly owned parks, and wildlife refuges. Paradise Ridge is made up of privately owned parcels and therefore, Section 4(f) does not apply. However, ITD is not encroaching on the Palouse remnants. See General Response Weeds and Wildlife. Safety The statement in the Screening of Alternatives document that you referenced stating that safety between action alternatives does not differ substantially has been clarified. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Response Safety-3 regarding how the safety of existing US-95 is considered in the revised Safety Analysis. Regarding the City of Moscow Sustainable Environment Commission quotation, additional data and clarification of the methodology was incorporated into the Revised Weather Analysis and the findings remain valid. See General Response Weather-2 regarding the data set for the Weather Analysis. The mitigation for possible increased wildlife collisions for the E-2 Alternative are discussed in General Response Safety-2. The City of Moscow Sustainable Environment Commission submitted their individual comments for

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			E2 would likely have the most effect on critical habitat for the giant Palouse earthworm (*Driloleirus americanus*). E2 would take 158 acres of agriculture/farmland; C3 takes 101. E2 would take twice as much prime farmland as would C-3. "The recommended alternative from the perspective of impact on farmland would be the C-3 alignment." [DEIS summary of results] E2 would take out 50.8 acres of prime farmland; C3 takes out 25. There is a unique farm operation on the top of Paradise Ridge—capitalizing on a large Palouse Prairie remnant there— that grows native Palouse Prairie plants and sells seeds and starts. E2 would spread invasive weeds much further up Paradise Ridge with the high potential of harming this business and the Palouse Prairie. Back in the Environmental Assessment days, the U.S. Environmental Protection Agency wrote, "… we anticipate that high value Palouse prairie habitat, wetlands, and streams are in the project area and may be affected by the proposed project. The EA (p. 22) states that remnants of Palouse prairie occur… An occurrence of Spalding's catchfly (Silene Spaldingii), proposed as threatened under the Endangered Species Act (ESA), has been documented in habitat surveys for the EA. … Based on the above information, it will be important to use extraordinary sensitivity, or Context Sensitive Design, in the design and placement of the roadway to ensure that the natural values and functions of the area … remain intact."	which comments are provided. See comments and responses to E-47. The mitigation measures that have been developed in coordination with IDFG have been added to the FEIS Chapter 9, Environmental Commitments. The E-2 Alternative would include constructing the undercrossing at Eid Rd to accommodate wildlife movement. See General Response Weather-2 regarding the referenced five-month weather data set. See General Response Weather-1 regarding how the C-3 Alternative was evaluated in the Weather Analyses. See General Responses Weather-5 and Weather-6 regarding fog and wind respectively. See General Response Safety-2 and General Response Weather-5 regarding how the differences between weather and wildlife collisions between alternatives were considered. General Response Weather-8 discusses the validity of the weather study and the safety analysis, which were based on AASHTO standards and approved by FHWA. See General Response Safety-6 regarding the significance of the differences between alternatives. The difference in safety is primarily due to the length of the 5-lane section on the north end of the project versus the total length of the alignments. The five lane sections are predicted to have a substantially higher crash rate compared to the four-lane divided sections. See General Response Safety-6 regarding the significance of the differences between alternatives. The predicted crashes due to wildlife collisions were similar to the predicted crash rates in the model for the

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			The resource agencies (U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, and Idaho Department of Fish and Game) all oppose E2, as do many other organizations including the Palouse Prairie Foundation, the Palouse Audubon Society, the Palouse Broadband of Great Old Broads for Wilderness, Palouse Environmental Sustainability Coalition, Palouse Group of the Sierra Club, Wild Idaho Rising Tide, and many individuals. The DEIS states that "Idaho Department of Fish and Game, the Environmental Protection Agency, and the US Fish and Wildlife Service prefer the C-3 Alternative to the E-2 Alternative.." [DEIS Executive Summary p. 8] The Idaho Department of Fish and Game stated in a letter to ITD, "In closing, we feel it is important to repeat one additional mitigation recommendation we have made in the Wildlife Assessment and at every other opportunity: We recommend avoidance of the eastern alignment. It has been IDFG's position from the start – a position supported by recommendations from the other resource agencies – that the eastern alternative will have the greatest direct and indirect impacts to wildlife and other resources. Avoidance of impact is the primary mitigation tool available. We recommend avoidance of alternative alignment E2." [October 26, 2007 letter IDFG (Dave Cadwallader, Clearwater Regional Supervisor) to ITD (James Carpenter, District Engineer)] (emphasis mine) The U.S. Department of Transportation Act of 1966 states, "It is the policy of the U.S. Government that	safety analysis, therefore additional crash factors were not warranted. See General Response Safety-2. The crash rates on the existing US-95 loop would be lower due to the reduced traffic volumes. See General Response Safety-3 regarding the revised safety analysis that considers the existing US-95. Weather Additional information regarding wind and snowdrifts is presented in the revised Weather Analysis (Qualls, 2014). The Weather Report that addressed wind speeds and fills, which you cited (Blackketter et al., 2006) was a draft but was not utilized in the DEIS. Information about wind speeds and the effects on fills is included in the Revised Weather Report (Qualls 2014). It includes specific wind measurements at three weather stations and considers the topography and alignment features in its analysis. The report finds that the highest wind gust speeds are at the Reisenhauer Hill weather station. Cumulatively 97 percent of the wind gusts at Reisenauer Hill did not exceed 30 mph. 99 percent of wind gusts at EC and WC did not exceed 30 mph. The frequency of wind gusts higher than 30 mph are very low. Risks associated with wind gusts as well as snowdrifts would be mitigated by the improved safety from the improved typical sections. See General Response Weather-4 and Weather-6. Length See General Response Safety-6 regarding the significance of the difference in length and safety between alternatives. Social Issues Displacements

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			special effort should be made to preserve the natural beauty of the countryside..." and "The Secretary [of Transportation] may approve a transportation program or project...only if: There is no prudent and feasible alternative to using that land..." (DEIS 5.1 Regulatory Framework and Policies, Section 4(f)) E2 is environmentally untenable, and there are feasible and prudent alternatives. It is irresponsible of ITD and FHWA to select E2 as their preferred alternative. ITD must stand with the resource agencies and follow the policies of the Federal Highway Administration (to take the least new right of way and maximize the use of existing infrastructure), the U.S. Environmental Protection Agency (to make the least impact on the environment), and adhere to the U.S. Department of Transportation Act of 1966 (preserve the natural beauty of the countryside). ITD must not select or build E2. SAFETY The "Screening of Alternatives" document states "There were only slight differences in the anticipated crash rates for the proposed new alignments." And, "…*safety between Action Alternatives does not differ substantially*" (p 204). Yet, the safety of E2 as reported in the DEIS is likely quite low. ITD doesn't include animal collisions in crash predictions, but animals might be more significant than access points. During the past 10 years on the existing route (with 19 more access points than E2	The numbers of residential and business impacts clarified in the FEIS. General Response Displacement-2 explains the different numbers of displacements on the referenced tables in the DEIS. See General Response Displacement-1 for a clarification on residential and business impacts. Quality of Life As previously noted, the SEC provided comments as part of the City of Moscow comments. The Noise Abatement Criteria (NAC) described in 23 CFR Section 772 (table 1) are very specific on what noise levels constitute an impact. Although the traffic noise might be audible at distances greater than 300 feet away from the proposed road the noise transect shows that at 230 feet the noise level drops below the NAC of 66 dBA for residences. Noise effects are discussed in the DEIS and FEIS Section 4.12. Regarding the project effects to public use, Paradise Ridge consists of privately owned parcels and ITD would have no impact over its recreational use. Its access for recreational activities are limited and it was not assessed as a publicly accessible recreational area. The alternatives would have different visual effects depending on the locations of the residents relative to the alignments as discussed in the FEIS Section 4.11. Additional information from the Community Impact Analysis (HDR 2006) has been added to the respective section in the FEIS. Additional information regarding traffic noise impacts on birds and ungulates has been added to the FEIS Section 4.8 and Chapter 6, Indirect and Cumulative Effects. Development

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			[p. 135]), 11% of crashes involved animals whereas only 8% were associated with access points (p. 112). [Dumroese personal communication] There is no doubt there will be more big game crossing E2 than C3 –a professional consultant suggested underpasses for big game on E2, but the ITD does not include this in their proposal. The natural resource agencies (Idaho Department of Fish & Game, U.S. Environmental Protection Agency, U.S. Fish & Wildlife Service) all prefer C3 over E2 (p. 16 of DEIS, Executive Summary) because of the presence of big game. When considering the corridor accident rate, adding in only a small factor for additional animal-caused crashes on E2 raises its accident number to approximately that of C3. [Flint] Considerable local traffic will still use old Highway 95 if E2 is built. What is most appropriate for route selection is the number of accidents in the "US 95 corridor" rather than just on the proposed new construction. The City of Moscow Sustainable Environment Commission also has concerns here: SEC also takes issue with ITD's findings regarding driver safety on the preferred alternative, E-2. First, the current data set for weather conditions prepared by ITD is significantly lacking in information to accurately conclude that any one alternative is safer than another. Second, ITD does little to mitigate the potential for vehicular ungulate collisions on the E-2 alternative. E-2 is the only alternative with a marginal to moderate effect on ungulate habitat suggesting more ungulate	All travelers would benefit from the improved safety of the roadway. See General Response Safety-1 regarding incorporation of frontage roads for the C-3 Alternative. The footprint of each alignment is based on a conceptual level of detail and is shown in the FEIS Section 2.6 Alternative Alignment Exhibits. During development of the DEIS, ITD worked with jurisdictions and experts to estimate where development is likely to occur with or without the project. That information is provided in the Community Effects Technical Report-Community Profile & Induced Development (HDR 2005a) and the Induced Development Update (HDR 2011c). All of the action alternatives would have Expressway Access Control, with five-lane sections on the north end of the project; however, the E-2 Alternative would have a shorter 5-lane section than the C-3 Alternative which would result in fewer new accesses, less development pressure and congestion and would improve safety at the south end of Moscow. The DEIS and FEIS state that growth is expected to occur up to approximately one mile south of Moscow regardless of whether the project is constructed or not. However, to mitigate for that growth, the action alternatives would have Expressway Access Control which is expected to limit development pressure, numbers of access points and reduce the potential for potential crashes. See General Response Access. Cost Estimated costs for mitigation have been factored into the total cost by alternative. See FEIS Chapter 8,

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			populations in this area. IDFG states that "avoidance of impact is the primary mitigation tool available" [October 26, 2007 letter IDFG (Dave Cadwallader, Clearwater Regional Supervisor) to ITD (James Carpenter, District Engineer)]. As there are two other alternatives available that meet ITD standards for safety, it is unclear why ITD would risk further accidents on the E-2 alternative. Further, it is unclear what mitigation measures ITD will take as ITD will "implement stipulations in a Memorandum of Understanding with IDFG which is currently being developed" (DEIS, Chapter 9, Environmental Commitments, pg. 230). At a minimum, ITD should consider either a) avoiding the E-2 alignment or b) constructing passage structures for large animal movement to reduce vehicular-ungulate collisions. Many believe the weather will be more severe – more snow-packed, icy conditions and fog – on E2. Much anecdotal data support this. However, ITD only conducted their weather measurements for 5 months during an exceedingly mild, snow-free winter. Stations were not positioned to compare the central alternatives with others; hence C3 is considered equivalent to E2 in fog when they are likely different. The weather study measured wind but no wind data are presented. Residents are familiar with high winds which would be hazardous to high-profile vehicles and are likely higher on E2 than C3, but this question cannot be answered because adequate data were not collected, despite nearly 10 years in which this could have been done.	Construction Phasing and Funding and Chapter 9 for mitigation measures. Environmental Effects Palouse Prairie See General Response Weeds and Wildlife regarding potential weed impacts to Palouse Prairie, Palouse remnants and Paradise Ridge, including impacts to worms. FHWA and ITD have been working with IDFG, USFWS, local conservation groups and landowners on a mitigation strategy. The proposed measures to minimize impacts of the E-2 and other alignments to Palouse remnants are described in the FEIS, Chapter 9, Environmental Commitments. ITD is committed to working with IDFG throughout final design and project implementation to further refine the mitigation measures agreed upon by both parties and described in Chapter 9, Environmental Commitments. Additional information regarding the financial investment of agencies and landowners in the potentially affected Palouse remnants has been added to the FEIS Sections 3.8 and 4.8. Weed Impact See General Response Weeds regarding potential weed impacts to Paradise Ridge and Palouse remnants. Giant Palouse Earthworm The giant Palouse earthworm genus and species was corrected in the FEIS Section 3.8 and 4.8 and in the IDFG's General Wildlife Assessment Technical Report (IDFG 2006). Additional information regarding the giant Palouse earthworm habitat and recent occurrences has been added to the FEIS Section 3.8. Pollinators

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			Considering the corridor accident rate with the above addition of a factor for big-game-caused accidents, and now adding anything for additional increased weather- related accidents on E2, E2 becomes less safe than C3. [Flint] It appears that in November 2007 the FHWA instructed ITD to "integrate an analysis of wildlife/vehicle collisions and climate effects into the safety evaluation prepared for the project." This information is on a single page. Discussion of these two factors in this analysis on this page is minimal. The weather analysis in this 2007 document does not consider any possible differences in weather between the alignments. Wildlife is dismissed with even less discussion. It does admit E2 would be the least safe from the perspective of wildlife-caused accidents. A small difference between C3 and E2 is frequently cited as the reason for the selection of E2. See the DEIS (pages 15, 16, 55, and 178) and the Safety Technical Report (p. 15) for examples of where this small difference in projected accident numbers is invoked as the reason for selecting E2. Specifically, p. 15 of the Executive Summary states that a major reason for selecting the E2 alternative is that it "has the greatest safety improvement compared to the other Action Alternatives." The ITD safety analysis for E2 is based primarily on the number of access points (driveways and crossroads) but ignores potential accidents caused by increased big game and more severe weather on E2, and accidents on old highway 95 involving local traffic which is	Additional information regarding matrix habitats and species diversity, including pollinators and alternative effects to those resources, has been added to the FEIS Section 3.8 and 4.8. See General Response Wildlife. Impacts to wetland functions and values will be mitigated as outlined in the Conceptual Mitigation Plan which is in compliance with 33 CFR 325 and 332. Wildlife Large game is known to utilize the project area and particularly the southern end of the project. The Idaho Highway Linkage Assessment (Geodata Services 2008) prioritized the Thorn Creek Wildlife Linkage as "low priority". This assessment was conducted by Idaho Fish and Game (IDFG) in April 2007 and included Region 2 personnel, US Forest Service, BLM, US Fish and Wildlife representation. While the E-2 Alternative would impact more moderate and marginal quality habitat, primarily for deer, there will be no population level impacts to any ungulate species. Several mitigation measures would minimize harm to ungulate species that may use the project area. See FEIS Chapter 9, Environmental Commitments including moving impacted water sources to the east of the E-2 Alignment, creating an underpass by Eid Rd to accommodate wildlife usage and installing fencing to guide ungulates to crossing areas. The improvement of the curvature, grade and clearing vegetation from clear zones will improve sight distance, recovery time and prevent ungulates from grazing along the roadway. See General Response Safety-2 and Wildlife. See General Response Agency-1 regarding the differences in opinion regarding ITD and FHWA's

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			unable to access E2. (It appears local traffic cannot access the new alignment except where it connects with old highway 95. This effectively restricts nearly all local traffic to old highway 95.) [Flint] Kas Dumroese has an interesting calculation: E2 is 475 feet shorter than C3 (p. 174), but using ITD's predicted million vehicle miles (Safety Technical Report Appendix D), route lengths, and predicted crashes (p. 173), the chance of traveling C3 safely during a year is 99.99951% compared to 99.99966% for E2. That 1.5-in-a-million improvement with E2 is of course negligible, and other safety factors are at play (including the fact that none of the alignments has been engineered, so lengths could change). – WEATHER A wind study (Blackketter et al., 2006), not included in the DEIS, did some wind simulations for the project relating increase in wind speed to fill height but did not do any wind measurements on site. It did determine that wind speed at the edge of the roadway increased with fill height. Figures in the report show wind speeds of up to nearly 60 mph for a flat section and around 80 mph for a 90-foot fill at the roadside for the same mean wind speed. With wind comes the potential for winter whiteouts and snow drifting across the roadbed as well as effects on larger vehicles. – LENGTH Alignments C3 and E2 are the same length for all practical purposes. "E2 is shorter" should not be	Preferred Alternative. Ungulates The rationale for conducting multiple wildlife studies is explained in the FEIS Section 3.8. See General Response Agency for an explanation of the difference in opinions regarding FHWA's and ITD's Preferred Alternative. Pine Forest Habitat The impacts to the 3.9-acre pine stand would have some impacts as stated; however, there is available habitat for the species in other pine stands in the general area. Farmland While the E-2 Alternative would impact more prime farmland soils and more producing farmland than the C-3 Alternative, it would avoid the highest producing farmland that the Modified W-4 Alternative would impact. Construction All the alternatives would have similar widths where the clear zone would be cleared of vegetation to improve sight distance. The areas outside of the pavement would not be bare but would be planted with native grasses and other vegetation which would reduce weed establishment and spread. Staging areas, haul roads, batch plants, material sources are described in the DEIS and FEIS Chapter 8, Construction Phasing and Funding. These sites will be determined during the design process. Mitigation The majority of the land that is directly impacted by the E-2 Alternative is cultivated wheat fields and cultivated

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			used as a selection criterion. – SOCIAL ISSUES DISPLACEMENTS In the DEIS, Table 8 (p53) and Table 39 (p135) both say residential displacements of 7 for C3 and 5 for E2, business displacements 8 for C3. The table on p. 17 in the "Selection of Alternatives" technical document says there would be no business displacements but 3 residential displacements on C3 and 5 on E2. [Flint] ITD right-of-way specialists state that no businesses will be displaced for any alignment, and that one residence would be displaced under either C3 or W4. An entire mobile home park plus one residence will likely be displaced under E2. ITD Administration now reportedly states that it is unknown at this time (March 2013) what businesses and residences will be affected and to what extent. [Meyer 2013]. Decisions of alignments must not be based on fluid numbers. It would seem that the right-of-way experts would have the most reliable numbers. Which indicates that E2 would be a poor choice. – QUALITY OF LIFE The City of Moscow Sustainable Environmental Commission again weighs in: The SEC has noted that the DEIS does not address certain quality of life issues that may be of concern to Moscow residents. The E-2 alignment will be	land that has been placed into the CRP program and has already been disturbed. The E-2 Alternative avoids directly affecting all Palouse remnants and native grassland. Habitat connectivity has been considered in the project and will be accommodated by designing overcrossings and culverts to allow movement of terrestrial and aquatic species. Context Sensitive Design must consider both human and social factors. See General Response Weeds and Wildlife. Measures that will mitigate for impacts to resources as a result of unavoidable effects to resources are listed in the FEIS Chapter 9, Environmental Commitments. Additional information has also been added to Chapter 9 regarding ITD's relevant Standard Specifications and Best Management Practices that will help minimize harm for each action alternative. See General Response Agency regarding the difference in opinion regarding ITD's and FHWA's Preferred Alternative. The FEIS Chapter 9 describes environmental commitments that would be proposed for each of the action alternatives. The ROD will identify the environmental commitments and mitigation measures for the Selected Alternative. All mitigation, including mitigation for vegetation impacts due to weeds are discussed in General Response Weeds and FEIS Chapter 9. Latah County Comprehensive Plan ITD and FHWA must balance the goals and considerations of numerous different stakeholders. US-95 serves not only the county but also the City of Moscow, regional and intra state travel. However, one

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			coming down a ridge line much closer to Moscow than the current alignment, which will likely increase the noise pollution for Moscow residents. The E2 alignment will increase the light pollution for residents living on the south side of town. In addition, the SEC believes that the E-2 alignment will reduce recreational opportunities available to Moscow residents who enjoy this area for its endangered Palouse Prairie habitat, wildlife viewing, hiking, etc. E2 would or could: result in a greater degree of visual quality effects than other alternatives (p. 180, Table 55). E2 clearly will have a greater visual impact and along a substantial portion of the route the roadway will appear to dominate the landscape. affect recreational view points and the view shed of Paradise Ridge from Moscow, Eid Rd and Cameron Rd (p. 181) and this could affect usage and access of the prairie. generate greater traffic noise impacts than C3 or W4 (p. 182, Table 56) and this could affect usage of the area by ungulates and birds. – DEVELOPMENT What areas are likely to be developed with each alternative? Who is to gain financially? How are these individuals influencing ITD? No consideration has been given in the DEIS to incorporating frontage roads along C3, which arguably would increase the safety there. Parts of the DEIS say that E2 will be controlled-	of the primary goals of the Comprehensive Plan is to retain the rural nature of the county. The E-2 Alternative recognizes that growth is predicted south of Moscow and that growth is not desired along the roadway. The limited access will help reduce development pressures and also improve public safety, which also addresses the purpose, and need for the project. Mitigation measures include many measures to minimize harm and that address the natural resource elements noted in your letter. During the DEIS development, the mitigation for impacts was not yet fully developed and was not required by FHWA NEPA regulations (23 CFR 771.1) to be included in the DEIS. Since then additional planning has occurred. Additional detail regarding mitigation has been added to the FEIS Chapter 9, Environmental Commitments. Thank you for your analysis of the Latah County Comprehensive Plan. See General Response Agency regarding the difference in opinion regarding FHWA's and ITD's Preferred Alternative. The discussion of mega loads on US-12 is a topic unrelated to this project and outside of the logical termini for this project. Within the project limits there is no known method for predicting future mega load usage of US-95. Roads are available for commercial uses. Recently Canadian purchasers of mega load equipment have announced that they will be purchasing within Canada to avoid delays due to mega load transport; therefore, Mega loads through the project area are generally expected to decline but are not specifically considered in the project's cumulative effects analysis.

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			access, and discounts that there will be additional entryways in the future. Other parts say that there would be growth along E2—which would decrease the safety of E2. The City of Moscow is concerned about potential development along E2: The report states that "E-2 could also increase property values and have growth along its alignment; however it would be less growth than W-4 and would have controlled access." Increased strip development along the E-2 corridor, especially if it included an extended 5 lane (4 travel and center turn) facility south of Moscow, would generally not be desirable. Increased access points, traffic signals and overall congestion in an area of fairly significant grade in the transition from Paradise Ridge to the [sic] Moscow could impede the safe function and operation of the highway system. [comment letter from the City of Moscow to ITD] – COST Estimated E2 and C3 costs are about the same (although it is unclear exactly what is included in the figures) – but mitigation costs would be higher per Idaho Department of Fish and Game recommendations for E2. – ENVIRONMENTAL EFFECTS PALOUSE PRAIRIE As you are aware, our Palouse Prairie is a highly endangered ecosystem, with an estimated less-than-one-percent of its historic extent remaining; aproximately 99% of the Palouse Grasslands have	–

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			been converted to cultivated agricultural lands (Noss et al., 1995). Loss of Palouse Grasslands has contributed to a number of plant species associated with the Palouse Bioregion being classified as species of conservation concern (Lichthardt and Moseley, 1997). The Palouse Grasslands are considered by the Idaho Natural Heritage Program to be one of the most endangered ecosystems in the U.S. (Noss et al., 1995). This ecosystem is the basis of the highly productive agriculture in the area. The soils are good and generally deep, and the diverse and beautiful prairie grasses and flowering plants have deep roots. These deep soils and root systems are home to beneficial worms and other underground and aboveground creatures. The Palouse Prairie is targeted as a habitat to protect by various federal and state agencies (including U.S. EPA, U.S. Fish and Wildlife Service, Washington Department of Fish and Game). The Nature Conservancy, the more local Palouse Land Trust, and the Palouse Prairie Foundation also focus on protecting Palouse Prairie. In addition, the Latah County Comprehensive Plan mentions protection of Palouse Prairie. Between 1995 and 2001, Washington's Department of Natural Resources Region 5 spent 38% of its $425,446 Wildlife Incentive Program budget on restoring native Palouse Prairie flora. Recently, the Nature Conservancy purchased more than 100,000 acres of the Zumwalt Prairie in an effort to preserve a northeastern Oregon version of Palouse Prairie.	

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			The project area includes about 18.3 acres of highest-quality Palouse prairie remnants and 17 acres of medium-high to medium-low quality remnants [p. 97]. Twelve remnants are near W4, 14 are near C3, and 24 are near (within 0.6 mile) E2 [p. 206]. C3 has no remnants really close, whereas E2 has a number within 100 yards or less. One km (0.6 mile) is the distance used in the vegetation technical report as their weed impact zone. The weed impact zone would extend to the top of Paradise Ridge if E2 is built. "Thirty-two areas were identified as Palouse prairie remnants. The primary threat to the persistence of Palouse remnants in their present state is colonization by weeds." [p. 206] The E2 alignment would be devastating to Paradise Ridge prairie lands owing to weed invasion [see pages 64-68 in the Vegetation Technical Report]. In that report, Prather and Lass state, "Hopefully in some small measure the number of introductions and their potential spread to critical prairie remnants can be reduced by implementing prevention, monitoring and mitigation plans." – E2 would or could affect more than twice as many prairie remnants in the project area as C3 or W4 (24 vs. 14 or 12 remnants, respectively, p. 207, Table 62); come closer to the largest and highest quality prairie remnants in the project area (p. 26, Vegetation Technical Report, Lichthardt 2005); put at risk a higher proportion of globally imperiled plant species found in Palouse Prairie than C3 or W4	

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			(Vegetation Technical Report, Lichthardt, 2005) – WEED IMPACT A Bureau of Land Management publication cites road building and weeds as the primary threats to Palouse Prairie (Weddell and Lichthardt, 1998). – "Thirty-two areas were identified as Palouse prairie remnants. The primary threat to the persistence of Palouse remnants in their present state is colonization by weeds." [p. 206] E2 would or could Put a higher number of prairie remnants including those found on the ridgeline of Paradise Ridge at risk of weed invasions created by highway construction and vehicular transport of weeds (p. 17, Vegetation Technical Report, Lass and Prather 2007); Put all prairie remnants in the project area at risk of invasion by new weed species from adjacent counties, states and countries connected by the U.S. 95 corridor (Vegetation Technical Report, Lass and Prather 2007); – GIANT PALOUSE EARTHWORM The wildlife assessment improperly states that no suitable habitat for *Driloleirus americanus*, the giant Palouse earthworm, will be affected. It also misspells both the genus and species epithets. A number of the most recent discoveries of this worm have been from locations on Paradise Ridge and the habitat is not strictly undisturbed prairie but also	

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			transitional zones. Palouse earthworm, *Drioleirus* [sic] *amercanus* [sic]: The Palouse earthworm is endemic to the Palouse bioregion. The species was first reported in 1897, and was described as being common in the area around Pullman, Washington; however, reported occurrences are very rare and there have been no recent confirmed occurrences reported in Idaho. Palouse earthworms inhabit relatively loose, rich soils in undisturbed bunchgrass prairie. Threats include loss of native Palouse habitat to agriculture, development and other disturbances, as well as introduction of European earthworm species. Determination of Effect and Rationale: No Effect There have been no reported occurrences of Palouse earthworm in the project area. No remnant Palouse plant communities (suitable habitat) will be effected [sic] by the project. [GENERAL WILDLIFE ASSESSMENT THORNCREEK ROAD TO MOSCOW p. 8] This information should be updated in the final EIS. – POLLINATORS There is no discussion in the DEIS on pollinators. Flowering plant species need pollinators. There is a very rich bee fauna on Paradise Ridge. Preserving Palouse Prairie is important not only for its own sake, but also for providing refugia for pollinators, which are needed for plant reproduction—including crops. "If the bee disappeared off the face of the earth,	

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			man would only have four years left to live." Albert Einstein [probable misattribution] These prairie remnants are likely an important resource for pollinators. "Most flowering plants depend on bees, butterflies, and other animals for pollination. … Pollinators have evolved with native plants, which are best adapted to the local growing season, climate, and soils. Most pollinators feed on specific plant species… Non-native plants may not provide pollinators with enough nectar or pollen, or may be inedible…" "Pollinators are vital to maintaining healthy ecosystems. They are essential for plant reproduction… Insects and other animals pollinate one-third of the food we eat – all kinds of fruits, vegetables, grains, nuts, and beans. … the economic value of insect pollination worldwide has been estimated at $217 billion." [U.S. Forest Service] Studies are ongoing at UI regarding relative pollinator diversity across native Palouse Prairie, lands in the Conservation Reserve Program, and active agricultural lands. – WETLANDS E2 would affect more than twice the acreage of wetlands as C3 but not as much as W4 (p. 146, Table 45); this is significant in terms of wildlife habitat and also flood control, in which wetlands play a significant role. – WILDLIFE E2 divides an area of significant large game migration. With their water supply on one side of	

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			the highway and cover on the other, deer (sometimes more than 100 a day), elk and moose will endanger themselves as well as motorists. Paradise Ridge is also home to many bird species including wild turkeys and pheasants, and coyote and fox. E2 would affect the greatest number of new rights-of-way (p.193, Table 61) which could reduce habitats that provide for habitat connectivity of prairie fauna, including pollinators (Hatten et al., 2013); E2 would affect more wildlife species dependent on the prairie or intergraded habitats of Paradise Ridge (p. 163, Table 47); The Moscow Sustainable Environment Commission again weighs in: The SEC is greatly troubled that ITD acted unilaterally when choosing E-2 as their preferred alternative, ignoring recommendations from US Fish and Wildlife Service, Environmental Protection Agency and Idaho Department of Fish and Game. These Agencies all recommend avoidance of E-2 as this alignment "will have the greatest direct and indirect impacts to wildlife and other resources." [October 26, 2007 letter IDFG (Dave Cadwallader, Clearwater Regional Supervisor) to ITD (James Carpenter, District Engineer)] – UNGULATES The Idaho Department of Fish and Game stood up against the eastern alignment from the very beginning, but ITD continually pushed the E2 route,	

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			calling in 3 different Wildlife experts (2005, 2007, and 2010). All three stated that the eastern alternative posed the largest concern for big game among the 3 alternatives being considered. – E2 would or could pass through higher quality habitat for ungulates, including elk, moose and deer, that utilize prairie (p. 171) increase noise and human presence in habitat used by ungulates (p. 171) affect more acres of ungulate habitat than C3 or W4 (4.4 ac vs. 0 and 0, respectively, p. 171), an estimate that is low because this acreage does not include prairie found in the area which ungulates certainly use for forage, movement, or refuge; – PINE FOREST HABITAT Approximately 89% of the ponderosa pine communities have been lost in Latah County. – E2 would affect more acreage of coniferous forest than C3 or W4 (3.9 ac v. 0 and 0, respectively p. 164, Table 48), destroying habitat for northern alligator lizard, pygmy nuthatch and long eared myotis; The northern alligator lizard (*Elgaria coerulea*) and pygmy nuthatch (*Sitta pygmaea*) are among the species listed as "Species of Greatest Conservation Need in the Palouse Prairie" [(IFG xxxx)] Anecdotal: A woman who lives on Eid Road in a house that would be destroyed by E2 says that they have 15-20 owls living in some trees behind their house. Species of owl unknown.	

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			– FARMLAND E2 would take twice as much prime farmland as would C3. "The recommended alternative from the perspective of impact on farmland would be the C-3 alignment." [DEIS summary of results] The C3 alternative would split fewer farms (4) than would E2 (6) and would result in fewer "remnant farms" of less than 20 acres (2 for C3, 5 for E2). (Community Impact Assessment Ch 3 Land Use Plans and Policies, p. 15) [FLINT] SEC is concerned that E-2 impacts the most acreage of prime farmland of all the alternatives. C-3 has the least impact to prime farm land and the least amount of new impervious pavement. This is of interest because it may impact the future sustainability of local food production. As indicated by the recent Palouse-Clearwater Food Summit (January 28, 2013 at the 1912 Center, Moscow, ID), there is an increasing demand for locally produced foods. – CONSTRUCTION The C3 alternative has smaller cut and fill maximum heights and requires 26% less total excavation. This means less disturbed ground in C3. Disturbed ground is prime habitat for invasive and noxious weeds. Given that ITD may clear "330' from the edge of traveled way" to permit big game to be seen along E2 (p. 7 Safety Analysis), the disturbance footprint of E2 is truly massive.	

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			Staging areas, haul roads, batch plants, gravel or fill sources and rubble pile locations all have impacts, both in terms of possible direct impacts to prairie remnants and in terms of additional disturbed ground susceptible to invasive weeds. These areas need to be specified in the DEIS, not left to the design phase. [FLINT] – MITIGATION The primary means of mitigation is avoidance of disturbance. Palouse Prairie cannot simply be re-created because it consists of so much more than just the plant community that many people associate with the prairie. It can be argued that the greatest loss is below ground – the complex character, properties, and biotic communities of uncultivated native soil are irreplaceable. These soils have required thousands of years to develop and are basically destroyed with any disturbance. The scientific community knows very little about the soil ecology of native soils; consequently, the danger of losing something without even knowing it exists (Dr. Dave Huggins, WSU Soil Scientist). The EPA noted for this project, "One of the most critical aspects of applying context sensitive design is the preservation of ecological connectivity… This can best be achieved using avoidance and minimization of impacts – which are the first and second priorities for mitigating impacts … Compensatory mitigation is appropriate only for truly unavoidable impacts that cannot be further	

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			addressed through improved siting and design when an action alternative is selected. … We anticipate that avoidance of sensitive, rare, and/or high value terrestrial and aquatic habitats will be the most significant environmental need for this proposed project. Maintaining habitat connectivity … will be a necessity." Under "Topics of Concern and Controversy" the DEIS states, "there has been disagreement between IDFG and ITD regarding appropriate mitigation." One recent mitigation proposal by IDFG is to put funding in a "bank" – $750,000 for E2 and $325,000 for C3. This is another indication that the E2 alignment is much worst environmentally. I cannot comment on specific mitigation measures as such measures will not be identified until the Record of Decision is issued. ("FHWA will issue a Record of Decision (ROD) selecting an Action Alternative, a combination of the Action Alternatives, or the No Action Alternative. The ROD will also provide the rationale for the decision and identify mitigation measures." [Executive Summary ES.11 Next Steps]) It is obviously far superior to avoid damaging the prairie rather than to damage the ecosystem and then try to mitigate by other means. It is not appropriate to suggest that as there will be increased building following construction of the highway, the environmental effects of the highway will be overshadowed and no mitigation will be necessary. There is no mention of environmental mitigation for	

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			harm to vegetation because ITD does not believe that there is any direct impact. However, Prather's vegetation study shows the inevitability of this happening and there should be some recognition by ITD of reparation – farmers also should be concerned that their fields are going to receive more weed pressures than they currently do. It is unclear what mitigation measures ITD will take as ITD will "implement stipulations in a Memorandum of Understanding with IDFG which is currently being developed" (DEIS, Chapter 9, Environmental Commitments, pg. 230). At a minimum, ITD should consider either a) avoiding the E-2 alignment or b) constructing structures for large animal movement to reduce vehicular-ungulate collisions. [SEC letter] Mitigation must include a management plan, as the indirect effects of the realignment will continue to damage adjacent Palouse Prairie. Also, decisions of mitigation acreage must be based on more than presence of a few plant species. Ideally, the determination would be made by an informed, independent party. And it should be spelled out in the FEIS, not the ROD. Latah County Comprehensive Plan The E-2 alignment goes against much of the Natural Resource Element in Latah County's Comprehensive Plan. – Latah County Comprehensive Plan NATURAL RESOURCE ELEMENT Goal: To ensure sound stewardship of the County's	

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			natural resources. Policies: Conserve streams, floodplains, wetlands, wooded areas, and other areas of natural significance and, where appropriate, incorporate natural features into planned developments as open space or buffer zones. Encourage awareness and conservation of unique natural resources in Latah County, such as Palouse Prairie. Prohibit development that significantly pollutes or degrades the natural environment. Protect wildlife habitat, particularly critical winter range, from encroachment of incompatible development. Promote availability of and access to public lands in Latah County. Latah County Comprehensive Plan and Land Use Map Resolution #2010-32 December 2010 http://www.latah.id.us/planningbuilding/PB_ComprehensivePlan.pdf – Latah County Comprehensive Plan Analysis – Policy 1 Conserve streams – E2 and C3 would have the same number of tributary crossings (5), but E2 would have fewer linear feet (affected) – quality Conserve floodplains – E3: 0 acres of floodplains affected; C3: 1.8 acres Conserve wetlands – E2: 3.61 acres of wetlands affected; C3: 0.99 acres Conserve wooded areas – E2: 3.9 acres of pine stands removed; C3: 0 acres	

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			"The primary disadvantage of E2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge which provides moderate ungulate habitat and E2 would also affect pine stands that are potential long-eared myotis, northern alligator lizard and pygmy nuthatch habitat." [DEIS p. 55] Conserve other areas of natural significance Paradise Ridge definitely is an area of natural significance. Alignment E2 is the most destructive of the ridge. Visual quality – E2: 50% Moderate-High plus High 3% Low, 47% Moderate, 25% Moderate-High and 25% High rating; C3: 23% Moderate-High plus High; 9% Low, 68% Moderate, 15% moderate-High, and 8% High. – Policy 2 Encourage awareness and conservation of unique natural resources in Latah County, such as Palouse Prairie. Palouse prairie is one of the most endangered terrestrial ecosystems in the United States. 0.1% of Palouse grasslands remain in a natural state. [Vegetarian Technical Report, p. 2-3] The project area includes about 18.3 acres of highest-quality Palouse prairie remnants and 17 acres of medium high to medium low quality remnants [DEIS p. 97] – E2 would have the most serious effects on Palouse prairie remnants on Paradise Ridge. Alignment E2 will result in serious indirect effects to 24 prairie remnants in the project area (and direct	

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			effects to at least one high-quality remnant, according to the EPA), with weed infestations due to construction and vehicular traffic posing the greatest threat. These 24 remnants will be exposed to the threat of invasion by noxious and invasive weeds [Biological Assessment Technical Report p.9] See also the map at the end of this letter. – "The primary threat to the persistence of Palouse remnants in their present state is colonization by weeds." [DEIS p. 206] – There are 12 remnants near W4, 14 near C3, and 24 near E2. [DEIS table 62, p. 206] C3 has no remnants really close, whereas E2 has a number within 100 yards or less. Six Palouse remnants occur within 1000 feet of alternative E2 and the closest is within 300 feet (Lass and Prather 2007). This includes the South End Paradise Ridge Conservation Site documented by the Idaho Conservation Data Center (CDC) in 1996 and a smaller remnant by CDC in 2005 as a conservation site. [DEIS] – Policy 3 Pollutes or degrades – The E2 Alternative is the only alternative that would affect wells, all of which are domestic. [DEIS p. 160] – Policy 4 Protect wildlife habitat Effects to ungulate habitat (deer, elk, and moose) –	

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			E2: 4.4 acres; C3: 0 acres. – "The primary disadvantage of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge which provides moderate ungulate habitat and E-2 would also affect pine stands that are potential long-eared myotis, northern alligator lizard and pygmy nuthatch habitat." [DEIS p. 55] Ungulate habitat quality is also higher along alignment E-2 for moose, elk and deer than along the other alignments. [DEIS Table 49, p. 169] – The table below has been transcribed. DEIS Table 48. Habitat Type Effects (acres) – Alternative W-4 Ag./Grassland: 159 Pine stands: 0 Ungulate habitat: 0 New right-of-way: 210 – Alternative C-3 Ag/Grassland: 101 Pine stands: 0 Ungulate habitat: 0 New right-of-way: 154 – Alternative E-2 Ag/Grassland: 158 Pine stands: 3.9 Ungulate habitat: 4.4	

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			New right-of-way: 207 – All agencies (U.S. Fish & Wildlife Service, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, Idaho Department of Fish and Game) are against E2 – Idaho Department of Fish and Game: "In closing, we feel it is important to repeat one additional mitigation recommendation we have made in the Wildlife Assessment and at every other opportunity: We recommend avoidance of the eastern alignment. It has been IDFG's position from the start – a position supported by recommendations from other resource agencies – that the eastern alternative will have the greatest direct and indirect impacts to wildlife and other resources. Avoidance of impact is the primary mitigation tool available. We recommend avoidance of alternative alignment E2." [October 26, 2007 letter IDFG (Dave Cadwallader, Clearwater Regional Supervisor) to ITD (James Carpenter, District Engineer)] The E2 alignment also goes against the Economic Development Element in Latah County's Comprehensive Plan and the goal of preservation of agricultural and forest land uses to ensure the continued viability of an agricultural and forest based economy in rural Latah County. – 4. ECONOMIC DEVELOPMENT ELEMENT Policies: Agriculture and Forestry Protect agricultural and forestry land from	

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			scattered development. Encourage agricultural and forestry diversification and experimentation, and "value added" industries. Encourage local and regional food self sufficiency. – Alignment E2 takes out 50.8 acres of prime farmland; C3 takes out 25. There is a unique farm operation on the top of Paradise Ridge, capitalizing on a large Palouse Prairie remnant there, that grows native Palouse Prairie plants and sells seeds and starts. The E2 alignment would spread invasive weeds much further up Paradise Ridge with the high potential of harming this business and the Palouse Prairie (see map following). – There is a connection here with the Port of Lewiston's expansion of barge docks, and with Judge B. Lynn Winmill's determination that the U.S. Forest Service has authority to regulate use of the U.S. 12 Wild and Scenic River Corridor in regard to defiling it by the 'megaload' traffic (cutting back trees, usurping and building new turnouts). Both actions mean a high potential for more and bigger loads traveling U.S. 95 through Moscow in the future. There has been no broad, cumulative effects analysis of these projects and this ruling. – Conclusions Mitigation must be addressed within the Final EIS. The safety, social, and environmental effects of E2 are worse than C3. The difference in length between E2 and C3 is insignificant. C3 is the most context-sensitive and	

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			would have maximum reuse of existing infrastructure. There is a prudent and feasible alternative to alignment E2. Therefore, ITD must drop E2 from further consideration. – David Hall 1362 Wallen Road Moscow, ID 83843 – Att: Weed spread map, Figure 4 from DEIS, Lass & Prather 2007. – References Blackketter DM, Qualls R, Cori G. 2006. Wind Study for the Proposed Highway 95 between Thorncreek and Moscow Idaho, KLK356, N06-06. Final Report to the Idaho Transportation Department. National Institute for Advanced Transportation Technology. 9 p. www.webs1uidaho.edu.niatt/research/Final_Reports/KLK356-N06-06.pdf – Dumroese, RK. 2013. Personal communication. Flint, S. 2013. Personal communication. Hatten TD, Looney C, Strange JP, Bosque-Pérez NA. 2013. Bumble bee fauna of Palouse prairie: Survey of native bee pollinators in a fragmented ecosystem. Journal of Insect Science (In press) – Idaho Department of Fish & Game. 2005, 2011. Idaho Comprehensive Wildlife Conservation	

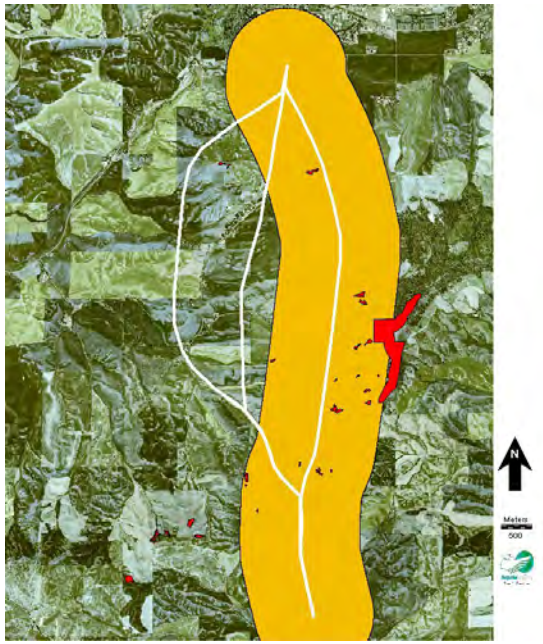
#	First Name	Name	Comment	Response
			Strategy – Palouse Prairie Section. fishandgame.idaho.gov/public/docs/compWildStrategy/palousePrairie.pdf – Noss, RF, LaRoe III ET, Scott JM. 1995. Endangered Ecosystems of the United States: a preliminary assessment of loss and degradation. USGS Biological Resources. 71 p. http://biology.usgs.gov/pubs/ecosys.htm – Lass L, Prather T. 2007. A Scientific Evaluation for Noxious and Invasive Weeds of the Highway 95 Construction Project between the Uniontown Cutoff and Moscow. – Lichthardt J, Mosely RK. 1997. Status and conservation of the Palouse grassland in Idaho. Idaho Department of Fish and Game, Boise, ID. – Meyer D. February 25, 2013. Impact will be severe. Letter to the Editor, Moscow-Pullman Daily News. Moscow, ID. – Sustainable Environment Commission. 2013. Letter to Moscow City Council. Paradise-ridge-defense.org/Moscow/US95CityCouncil02.19.13-SustainableEnvironmentCommission.pdf – USFS 2010. Attracting Pollinators to Your Garden Using Native Plants. U.S. Forest Service, Washington, DC. www.fs.fed.us/r9/wildlife/plants_botany/docs/Nati	

#	First Name	Name	Comment	Response
			onal_Pollination_v3.pdf – Weddell B, Lichthardt L. 1998. Identification of conservation priorities for and threats to Palouse Grassland and Canyon Grassland remnants in Idaho, Washington, and Oregon. Idaho Bureau of Land Management, Technical Bulletin No. 98-13. – CC: – Federal Highway Administration Idaho Division Office 3050 Lakeharbor Lane, #126 Boise, ID 83703 Idaho.FHWA@fhwa.dot.gov Scott Frey, Transportation Engineer Planning/ROW FHWA-ID, Scott.Frey@dot.gov Kyle Holman, Operations Engineer / Pavement, Materials FHWA-ID kyle.holman@dot.gov Brent Inghram, Environmental Program Manger FHWA-ID, brent.inghram@dot.gov – U.S. Environmental Protection Agency, Region 10 – Washington Office 1200 Sixth Avenue Seattle WA 98101 Elaine Somers, NEPA/309 Environmental Review, somers.elaine@epa.gov – U.S. Environmental Protection Agency, Region 10 0 Idaho Office 950 W. Bannock St. Suite 900	

#	First Name	Name	Comment	Response
			Boise, ID 83702 Carla Fromm, Project Officer, fromm.carla@epa.gov – U.S. Environmental Protection Agency Office of Federal Activities, EIS Filing Ariel Building; South Oval Lobby, Mail Code 2252-A 1200 Pennsylvania Avenue, NW Washington, DC 20460 Susan Bromm, Director, OFA bromm.susan@epa.gov Cliff Rader, Director, NEPA Compliance Division, rader.cliff@epa.gov – U.S. Fish and Wildlife Service Snake River Fish and Wildlife Office/Idaho Fish and Wildlife Office 1387 S. Vinnell Way, Room 368 Boise, ID 83709 Clay Fletcher, Biologist, clay_fletcher@fws.gov Juliet Barenti, Wildlife Biologist, FWS-Northern Idaho Field Office, Juliet_barenti@fws.gov Mark Robertson, Branch Chief, Consultation Conservation Planning Assistance Mark_Robertson@fws.gov – – U.S. Department of the Interior Office of Environmental Policy & Compliance Portland Region 620 SW Main Street Suite 201 Portland, OR 97205-3026 Allison O'Brien, Regional Environmental Officer,	

#	First Name	Name	Comment	Response
			Allison_OBrien@ios.doi.gov – Mandy Lawrence, Regional Environmental Protection Assistant, Mandy_Lawrence@ios.doe.gov – – U.S. Department of Transportation 1200 New Jersey Ave, SE Washington DC 20590 Office of the Secretary Ray LaHood, Secretary of Transportation, ray.lahood@dot.gov Joanna Turner, Deputy Assistant Secretary for Governmental Affairs, W85-340, Joanna.turner@dot.gov – – Idaho Transportation Department Headquarters 3311 W. State St. Boise, ID 83703 Shawn Smith, Senior Environmental Planner, ITD-Lewiston, Shawn.Smith@itd.idaho.gov – Victoria Jewell Guerra, Senior Environmental Planner, ITD-Boise, Victoria.JewellGuerra@itd.idaho.gov Sue Sullivan, Environmental Section Manager, ITD-Boise, Sue.Sullivan@itd.idaho.gov Ken Helm, Senior Planner, ITD-Lewiston, Ken.Helm@itd.idaho.gov –	

#	First Name	Name	Comment	Response
			Idaho Transportation Board Sue Higgins, Secretary, Idaho Transportation Board, Sue.Higgins@itd.idaho.gov Brian Ness, Department Director, Brian.Ness@itd.idaho.gov Jerry Whitehead, Idaho Transportation Board Chairman, Jerry.Whitehead@itd.idaho.gov Janice (Jan) Vassar, Idaho Transportation Board Member, Lewiston, Janice.Vassar@itd.idaho.gov – Idaho Department of Fish and Game Clearwater Region 3316 16th Street Lewiston, ID 83501 Ray Hennekey, Environmental Staff Biologist, IDFG-Lewiston, ray.hennekey@idfg.idaho.gov Dave Cadwallader, Clearwater Regional Supervisor, IDFG-Lewiston, dave.cadwallader@idfg.idaho.gov – Idaho Department of Environmental Quality Lewiston Regional Office 1118 “F” Street Lewiston ID 83501 Clayton Steele, Regional Administrator, DEQ-Lewiston, clayton.steele@deq.idaho.gov – Office of the Governor State Capitol P.O. Box 83720 Boise, ID 83720 Governor Clement Leroy "Butch" Otter, governor@gov.idaho.gov	

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			– Shirley Ringo, Idaho State Representative, District 5 sringo@house.idaho.gov – Dan Schmidt, Idaho State Senator dschmidt@senate.idaho.gov Latah County Commissioners P.O. Box 8068 Moscow, ID 83843 Board of County Commissioners, bocc@latah.id.us Dave McGraw, District III, Tom Stroschein, District II, Richard Walser, District I Kara Egan, Deputy Clerk of the Board/Administrative Assistant: kega 	

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			Figure 4. E2 route with 0.6 miles (yellow) buffer showing potential weed effect on prairie remnants (red).	
L-30	Brad Idaho Conservation League	Smith	Idaho Transportation Department Office of Communications P.O. Box 7129 Boise, ID 83707-1129 – March 5, 2013 – Subject: U.S. 95, Thorn Creek Road to Moscow Project – To whom it may concern: Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 20,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. – We appreciate the fact the transportation safety is a top priority for the Department. At the same time, we believe that there are steps that the Department can take to reduce the effects of its projects to the environment. –	ITD will mitigate for the impacted functions and values of the wetlands according to 33 CFR Parts 325 and 332, Compensatory Mitigation for Losses of Aquatic Resources. The wetland mitigation is described in the Conceptual Wetland Mitigation Technical Report (ITD, 2013) and summarized in Chapter 9, Environmental Commitments. It will include use of credits from the Cow Creek Mitigation Site, which is within the same watershed just south of the impacted wetlands. Mitigation credits will also be purchased from a mitigation bank if more area is needed. The cumulative impacts to wetlands are also evaluated by the USACE as part of their permitting program and are considered in the mitigations that they require for all wetland impacts. ITD has committed to many other mitigation measures including sediment and erosion control measures during construction, reseeding, stormwater treatment to reduce water quality impacts and weed management to minimize weed dispersal from the project, and wildlife crossings. ITD has been working with agencies including USFWS and IDFG to develop mitigation measures for wildlife. All required permits and approvals, including permits for in water work, will be obtained prior to construction should an action alternative be selected. The commitments and mitigation that ITD and IDFG agreed upon are identified in the FEIS Chapter 9, Environmental Commitments. ITD will design crossings that are within a 100-year

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			For example, many of ITD's projects involve the loss of wetlands, which are important to wildlife and water quality protection. The preferred alternative will reduce area wetlands by more than three acres. On its face, this might appear to be negligible, but the incremental loss of wetlands over time, for a variety of reasons, is like death by a thousand paper cuts. As such, we recommend that the Department mitigate for the loss of these wetlands. Ideally, a wetland mitigation program would restore historical wetlands within the affected watersheds. The Department could utilize historical information, such as aerial photos, to determine the location and extent of wetlands that have been lost over time, and then target these locations for restoration. Similarly, the Department should consider funding a mitigation program, which would restore habitat for wildlife and plants. In this particular area, restoring patches of Palouse Prairie habitat would make the Thorn Creek to Moscow Project more palatable from and environmental standpoint. Another concern that our members have with ITD projects is the effects to water quality. During construction, the contractors need to take steps to reduce erosion and sediment delivery to waterways. There are many best practices that have been developed by transportation and construction officials around the country, which may be employed here to reduce erosion and sediment. All necessary water quality and fill permits must be obtained before construction begins.	floodplain to pass the 100-year flood event, however, the remainder of the crossings will be designed to pass a 25 or 50-year flood depending on the site. Disturbed ground along the roadway will be seeded with native grasses and forbs that will be successful and will minimize weed establishment. Trees and shrubs will not be planted next to the roadway to discourage wildlife from browsing along the roadway, to prevent ice from forming in shaded areas of the roadway and to improve sight distance. However, the grass and forb seed mix along the roadway will uptake nutrients and help to filter sediments and toxicants in the stormwater, thereby helping to improve water quality. See FEIS Chapter 9, Environmental Commitments.

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			At tributary crossings, we appreciate the fact that structures will be placed to accommodate stream flows. All crossings should accommodate 100-year flood events and provide passage for aquatic organisms. We also recommend planting riparian buffer strips along these tributaries within 300 feet of the shoulder of the road. The riparian strips should consist of native grasses, sedges, shrubs, and trees. This will reduce the amount of pollution draining from the road surface into the waterway. Finally, we believe that ITD should monitor the number of vehicle-wildlife collisions that occur between Lewiston and Moscow. The locations of these collisions should be recorded by species, date, time of day, latitude and longitude. While recording such information has been traditionally been documented by milepost, latitude and longitude information will yield more meaningful data. This information should be compiled in an annual report and made available to the public and the Idaho Department of Fish and Game. The reports would help inform future safety and wildlife mitigation needs should they arise. – Sincerely, Brad Smith, Conservation Associate	
L-31	Sharon W. Idaho Department of Fish and Game	Kiefer	See Idaho Department of Fish and Game Letter under Section 10.3 Agency Comment Responses.	–
L-32	Lahde	Forbes	Lahde Forbes 1043 Showalter Rd.	See General Response Safety-6 regarding the significance of the difference in length and safety

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			Moscow, ID 83843 – February 18, 2013 – Idaho Transportation Department Adam Rush, Public Involvement Coordinator P.O. Box 7129 Boise, ID 83707-1129 – Dear Mr. Rush: I am writing you with concerns regarding the proposed Highway 95 rerouting, south of Moscow. If you would please take a moment to consider the following, I would greatly appreciate it. Please note that I do not reside anywhere near the proposed alternatives, therefore I do not stand to personally benefit or face losses related to the outcome of this decision, other than as a concerned Moscow resident. I went to the ITD Public Hearing on January 23rd and was thankful for the friendly assistance I received from the ITD staff and consultants. I went to the meeting with several key concerns; how do the E-2 and C-3 alternatives compare regarding safety, how will weather conditions affect traffic safety on alternatives E-2 and C-3, and which eight businesses will be displaced if C-3 were chosen? I was very surprised by what I learned and would like to share these insights with you. First, I spoke with Curtis Amzen, ITD District 2 Project Development Engineer. He informed me that the main reason E-2 is safer than C-3 is that it	between alternatives. See the FEIS Section 4.10 for additional detail regarding the severity of crashes in different locations, including Reisenauer Hill. Improvements at Reisenauer Hill are discussed in General Response Safety-5. The alternatives would have Expressway Access Control as described in General Response Access. General Response Weather-2 regarding the reference five-month data set and how it relates to the larger 30+-year data set. See Response L-21 for a response to Bradley Halter's comments. See General Response Weather-1 regarding how information for the C-3 Alternative was evaluated in the Weather Analysis. General Response Weather-8 discusses the validity of the Weather Analysis and the Safety Analysis. The Weather Analyses (Qualls 2014) describe the general climate of the region based on historical climate information such as data from the University of Idaho Plant Sciences Farm (PSF), which extends back to 1892. The climate is the same for all their alternatives. The variability in weather characteristics between alternatives is based on physical and topographic variations in the landscape and alignments but all the alternatives would be designed to AASHTO standards and will be safe. The relative safety is reflected in the Revised Safety Analysis (ITD 2013). General Response Weather-3, Weather-4, Weather-5 and Weather-6 address comments on ice, snow, snowdrift, fog and wind.

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			has less distance (0.7 miles) of 5-lane highway (4 lanes with a center turn lane). This is where accidents are greatest due to increase vehicle travel from entering and exiting businesses. I find this ironic because looking at the safety concerns of most people in our community they are worried about accidents on Reisenauer Hill, where actual fatalities occur at high speeds. As you may know, the predicted crash rate (crashes/year) is 10.9 for C-3 and 7.7 for E-2. But when looking at injury/fatality numbers for E-2 and C-3, the difference is very little; 3.8 and 4.7 respectively. If you look at the rural divided highway segment, which most of -2 is, you'll find that it actually has a HIGHER fatality and injury rate than C-3's similar segment. Another consideration is that as development occurs along the undeveloped portion of E-2 near Moscow, additional access points may be created. Although Type IV right -of -way will be purchased for the E-2 alignment and it has been stated that new access points would not easily be granted, it is still possible. Any additional future access points along E-2 would decrease the safety of the highway bringing it closer to that of C-3. Much of the development along C-3 has already occurred and the likelihood of additional access points there would appear to be less. I also talked with Dr. Russell Qualls, ID State Climatologist and ITD's weather consultant for the safety study. It is not a secret here in Moscow that many think the weather data taken for five months	See General Response Displacment-1 for a clarification of the potential residential and businesses impacts. FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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			during the mildest winter in the last 10 years is fraught with errors. In my conversation with Dr. Qualls I hoped to understand how he came up with his data. He insisted he could make "inferences' based on very limited data, much of which was taken off -site in a completely different bioregion at the University of Idaho Plant Sciences Lab. After listening to his reasoning, I decided to get a second opinion from Bradley Halter who is a retired NOAA meteorologist. He said that the only way to "infer" data from one unrelated site to another is if the data is collected at locations specific to the alternatives over a long period of time. Here are a couple of Mr. Halter's responses from a recent email: "The report refers to the desire to characterize the climate of the study area, yet only data from Jan. through May 2005 were included in the study. Since the word "climate" usually refers to some long-term average of meteorological variables, preferably 5 to 10 years, it would appear to me that this study falls far short of characterizing the climate of the study area." "It appears to me that the C-3 alternative was eliminated from consideration at the very beginning. No measurements were made in the vicinity of the new alignment sections, which deviate from the present 95. In analyzing the possible new alignment corridors for 95 on pp. 25-26, assessments are given for the Eastern and Western alternatives. However, of the Central Corridor, the report, in its first mention of the	

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			Central Corridor, says only that it "... is described better by the climate description of the Eastern Corridor..." So, the Central Corridor has not actually been characterized in its own right by the study!" If the methodology used to collect weather data can be deemed inaccurate, then Mr. Amzen's safety study should be re-evaluated with proper climate data. And, if climate differences are present then this could cause the alignments to have crash modification or calibration factors applied affecting the outcome of weather related crash data. It seems prudent that if safety is a top priority then you should use your due diligence to ensure that the data is as accurate as possible. Over the course of the nine years during which the DEIS was drafted, that quality data could have been collected. Many people who visit and live on the ridge in winter have seen increased levels of snow, ice, snow drifting due to high winds and ice forming fog, but we have no way of proving this scientifically in a measured way due to lack of data. Please collect proper data before drawing a potentially incorrect conclusion as to the safety of the E-2 alternative. If weather had been taken seriously as a safety factor in the DEIS studies, would the conclusion have been that the E-2 and C-3 alternatives are equally safe? Or would the C-3 alternative have been projected as the safest alternative? If Mr. Halter were to attempt to use Mr. Quall's weather data to guess at conditions on the proposed alternatives, here is what he says: "Even with the lack of data, I think a consideration	

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			of the C-3 alignment topography and the conclusions drawn from the assessments of the Eastern and Western Corridors can lead to some useful conclusions regarding C-3. The Western Corridor assessment includes a higher likelihood of cold air drainage temperatures leading to possible icy or frosty road surface. This is because the Western Corridor includes significant sections in the lowland flats. The new C-3 alignment, located on higher sloping terrain to the east of present 95 could very well be above much of the cold air pooling which occurs in the flats below. Furthermore, being lower in elevation than the Eastern Corridor, it would more frequently be below the fog, which was recorded at the eastern monitoring site. Note that it is the high elevation sites, the eastern (over the western shoulder of Paradise Ridge) and Reisenauer Hill, that had the greatest reductions in visibility due to fog." At the IDT Hearing, I also spent more than an hour talking with Tim Long, District Right of Way Supervisor, and Carmen Reese, Senior Right of Way Agent. We looked at which eight businesses would be displaced on alternative C-3. They informed me that in fact "no businesses" will be displaced, and the widening of current Hwy 95 would have no effect beyond a potential noise increase. I was surprised that ITD had "eight businesses displacements" as one of its main four reasons for not choosing C-3 as its preferred alternative since this information is inaccurate. Tim Long wanted me to stress in this letter that there will be "no	

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			definitive businesses displacement" (on C-3) and this is "misleading" to the public. I expect to see this information corrected in the subsequent ITD Hearing information boards and in the DEIS/FEIS. Another concern for Moscow and the surrounding communities is the displacement of residents. On February 11, 2013 I spoke again with Tim Long to clarify what we may expect for residential displacements. He said that E-2 would displace the most residents because of issues with a displaced well and that ITD had decided to relocate all of the residences within the mobile home park and a house above the park on Eid Rd. He also stated that only one residence would be displaced along the C-3 route. This information is very different than that presented at the 01/23/13 public hearing and in the DEIS, which stated that C-3 would displace 7 residences and E-2 would displace only 5. It appears that there has been an error made in the information disseminated to the public and to the board making the final alignment decision. The issues I have pointed out above are a select few that I felt were especially important in terms of safety and impact on residents along the two alternatives. I have not covered the importance of preserving prime farmland, ungulate habitat, and the last few remaining examples of intact Palouse Prairie. I am requesting you consider changing the preferred alternative to C-3, which is comparable in safety and mobility to E-2, but will create less displacements of human settlement, less negative impact on wildlife, help maintain plant	

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			communities, and conserve prime farmland. Please take into account these considerations when making your final decision on the realignment of US-95. Thank you for your time and consideration in this matter, Lahde Forbes Cc: Jerry Whitehead, ITD Chairman R. James Coleman, ITD Vice Chairman Janice Vassar, ITD Board Member Julie DeLorenzo, ITD Board Member Jim Kempton, ITD Board Member Dwight Horsch, ITD Board Member Lee Gagner, ITD Board Member Dave McGraw, Latah County Commissioner Tom Stroschein, Latah County Commissioner Richard Walser, Latah County Commissioner	
L-33	Ian Citizens for Safe 95	von Lindern	Citizens for a Safe 95 3697 Highway 95, Moscow, ID 83843 March 22, 2013 – Board of County Commissioners Latah County Courthouse P.O. Box 7129 Moscow, ID 83843 – By email to dmcgraw@latah.id.us; tstroschein@latah.id.us; rwalser@latah.id.us – Dear Commissioners:	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See General Response Safety-3. ITD is continuing to work together with IDFG and other resource agencies to come to an agreement on alternative's impacts and appropriate mitigation. Since the DEIS hearing, ITD in cooperation with IDFG, USFWS and EPA have developed mitigation strategy to compensate for impacts to important resources. See

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			Citizens for a Safe 95 is a group of more than 90 land and business owners, tenants and residents that own, and reside on property impacted by one or more of the alternative alignments assessed in the Idaho Department of Transportation (ITD) – Draft Environmental Impact Statement (DEIS) for the Thorn Creek-to-Moscow Section of Highway 95. Collectively, we own more than 80% of the property needed to be acquired for any of the proposed new routes. We have provided the attached comments to the ITD. We believe the ITD has done a comprehensive, detailed, and thorough job with the DEIS. We unanimously support the Preferred Alternative – Route E2. (Copy of Written Testimony attached). Also attached you will also find three letters we have submitted to the Commissioners and Director of the Idaho Department of Fish and Game and the Board and Director of ITD and the Governor. In 2003, the inability of ITD and Idaho F&G to cooperate and fulfill their obligations resulted in a District Court ruling requiring this DEIS. The cost of the failure of these two agencies to cooperate is now well documented over the past nine years. This four mile section of highway includes the 4th, 6th and 13th most dangerous highway ½-mile segments in the entire Idaho highway network. As this court-mandated DEIS has proceeded, seven lives have been lost, three dozen citizens permanently injured, and $10s of millions of dollars incurred in medical and property damage. The obituaries of the victims include teachers, University of Idaho students,	Chapter 9, Environmental Commitments. The delayed delivery of the DEIS to IDFG was an oversight. As soon as it was discovered, the DEIS was hand carried to IDFG and the public comment period was extended. See General Response Agency regarding the disagreement between ITD and agencies regarding ITD's Preferred Alternative. See General Response Schedule regarding the next steps in the environmental process and the anticipated schedule. The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See General Response Safety-3. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Displacement-1 offers clarification regarding residential and business impacts. All affected landowners and residents will be compensated according to the Uniform Relocation Act. See FEIS Appendix 5, Uniform Relocation Act.

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			parents and children. In just the last few weeks four serious accidents have occurred including a father of five from Lewiston who lost his life on Reisenauer Hill. Shortly before the 2003 Court decision a pregnant woman, a grandmother, another young mother, and an infant were killed on Reisenauer Hill by an out-of-control semi-truck. Route E-2 is the only alternative that eliminates this lethal segment, minimizes access, takes local traffic off the highway and causes the least disruption in our lives. We note the DEIS suggests that IF&G and IDT continue to disagree and have continued to be unresponsive to each other in conducting and reviewing the DEIS. The indication that IF&G did not receive the DEIS for review in a timely manner supports this conclusion. We fear that continued squabbling between IF&G and ITD will lead to further delay, deaths, injuries and damage. We respectfully request that the Commissioners support Alternative E-2 and continue to monitor and encourage the ITD and IF&G management to give serious attention to this matter; assure that their staffs works cooperatively with IF&G; secure an agreement with ITD that fairly mitigates those legitimate IF&G concerns; and allow the new highway to be built as soon as possible. Thank you for your prompt attention to this serious matter important to all users and residents on this dangerous section of US Highway 95. Sincerely, Ian von Lindern For Citizens for a Safe 95	

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			Cc: Director and Board of IF&G Office of the Governor Latah County Commissioners Citizens for a Safe 95 3697 Highway 95 Moscow, ID 83843 – March 22, 2013 Honorable Butch Otter Governor, State of Idaho P.O. Box 83720 Boise, ID 83720 By email to governor@gov.idaho.gov – attention Amy – Dear Governor Otter: Citizens for a Safe 95 is a group of more than 90 land and business owners, tenants and residents that own, and reside on property impacted by one or more of the alternative alignments assessed in the Idaho Department of Transportation (ITD) – Draft Environmental Impact Statement (DEIS) for the Thorn Creek-to-Moscow Section of Highway 95. Collectively, we own more than 80% of the property needed to be acquired for any of the proposed new routes. We have provided the attached comments to the ITD. We believe the ITD has done a comprehensive, detailed, and thorough job with the DEIS. We unanimously support the Preferred Alternative – Route E2. (Copy of Written Testimony attached). Also attached you will also find two letters we have	

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			submitted to the Commissioners and Director of the Idaho Department of Fish and Game and the Board and Director of ITD. In 2003, the inability of ITD and Idaho F&G to cooperate and fulfill their obligations resulted in a District Court ruling requiring this DEIS. The cost of the failure of these two agencies to cooperate is now well documented over the past nine years. This four mile section of highway includes the 4th, 6th and 13th most dangerous highway ½-mile segments in the entire Idaho highway network. As this court-mandated DEIS has proceeded, seven lives have been lost, three dozen citizens permanently injured, and $10s of millions of dollars incurred in medical and property damage. The obituaries of the victims include teachers, University of Idaho students, parents and children. In just the last few weeks four serious accidents have occurred including a father of five from Lewiston who lost his life on Reisenauer Hill. Shortly before the 2003 Court decision a pregnant woman, a grandmother, another young mother, and an infant were killed on Reisenauer Hill by an out-of-control semi-truck. Route E-2 is the only alternative that eliminates this lethal segment, minimizes access, takes local traffic off the highway and causes the least disruption in our lives. We note the DEIS suggests that IF&G and IDT continue to disagree and have continued to be unresponsive to each other in conducting and reviewing the DEIS. The indication that IF&G did not receive the DEIS for review in a timely manner supports this conclusion. We fear that continued	

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			Citizens for a Safe 95 is a group of more than 90 land and business owners, tenants and residents that own, and reside on property impacted by one or more of the alternative alignments assessed in the Idaho Department of Transportation (ITD) – Draft Environmental Impact Statement (DEIS) for the Thorn Creek-to-Moscow Section of Highway 95. Collectively, we own more than 80% of the property needed to be acquired for any of the proposed new routes. We have provided the attached comments to the ITD. We believe the ITD has done a comprehensive, detailed, and thorough job with the DEIS. We unanimously support the Preferred Alternative – Route E2. (Copy of Written Testimony attached). Also attached you will also find a letter we have submitted to the Commissioners and Director of the Idaho Department of Fish and Game. In 2003, the inability of ITD and Idaho F&G to cooperate and fulfill their obligations resulted in a District Court ruling requiring this DEIS. The cost of the failure of your two agencies to cooperate is now well documented over the past nine years. This four mile section of highway includes the 4th, 6th and 13th most dangerous highway ½-mile segments in the entire Idaho highway network. As this court-mandated DEIS has proceeded, seven lives have been lost, three dozen citizens permanently injured, and $10s of millions of dollars incurred in medical and property damage. The obituaries of the victims include teachers, University of Idaho students, parents and children. In just the last few weeks four	

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			serious accidents have occurred including a father of five from Lewiston who lost his life on Reisenauer Hill. Shortly before the 2003 Court decision a pregnant woman, a grandmother, another young mother, and an infant were killed on Reisenauer Hill by an out-of-control semi-truck. We note the DEIS suggests that IF&G and IDT continue to disagree and have continued to be unresponsive to each other in conducting and reviewing the DEIS. The indication that IF&G did not receive the DEIS for review in a timely manner supports this conclusion. We fear that continued squabbling between IF&G and ITD will lead to further delay, deaths, injuries and damage. We respectfully request that the ITD Board and Agency management give serious attention to this matter; assure that your staff works cooperatively with IF&G; secure an agreement with ITD that fairly mitigates those legitimate IF&G concerns; and allow the new highway to be built as soon as possible. Thank you for your prompt attention to this serious matter important to all users and residents on this dangerous section of US Highway 95. – Sincerely, Ian von Lindern For Citizens for a Safe 95 – Cc: Director and Commission of IF&G Office of the Governor Latah County Commissioners –	

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			Citizens for a Safe 95 3697 Highway 95 Moscow, ID 83843 – March 21, 2013 Commissioners and Director Idaho Department of Fish and Game P.O. Box 25 Boise, ID 83712 – Dear Commissioners and Director: Citizens for a Safe 95 is a group of more than 90 land and business owners, tenants and residents that own, and reside on property impacted by one or more of the alternative alignments assessed in the Idaho Department of Transportation (ITD) – Draft Environmental Impact Statement (DEIS) for the Thorn Creek-to-Moscow Section of Highway 95. Collectively, we own more than 80% of the property needed to be acquired for any of the proposed new routes. We have provided the attached comments to the ITD. We believe the ITD has done a comprehensive, detailed, and thorough job with the DEIS. We unanimously support the Preferred Alternative – Route E2. As you are aware your Agency has asked for additional review time for DEIS. We find this confusing and wish to make you aware of our concerns. In 2003, the inability of ITD and Idaho F&G to cooperate and fulfill their obligations resulted in a District Court ruling requiring this DEIS. The cost of the failure of your two agencies to	

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			cooperate is now well documented over the past nine years. This four mile section of highway includes the 4th, 6th and 13th most dangerous highway ½-mile segments in the entire Idaho highway network. As this court-mandated DEIS has proceeded, seven lives have been lost, three dozen citizens permanently injured, and $10s of millions of dollars incurred in medical and property damage. The obituaries of the victims include teachers, University of Idaho students, parents and children. In just the last few weeks four serious accidents have occurred including a father of five from Lewiston who lost his life on Reisenauer Hill. Shortly before the 2003 Court decision a pregnant woman, a grandmother, another young mother, and an infant were killed on Reisenauer Hill by an out-of-control semi-truck. The DEIS now recommends Route E2 on the basis of safety. We concur. E2 is the only route that eliminates the lethal Reisenauer Hill and takes the local business, residential and farm traffic off US 95, greatly reducing access points to the highway. Several other reasons for our support of Route E2 are found in the attached petition. We also note the DEIS suggests that IF&G and IDT continue to disagree and have continued to be unresponsive to each other in conducting and reviewing the DEIS. The indication that IF&G did not receive the DEIS for review in a timely manner supports this conclusion. However, we are also told in public proclamations by local environmental activist groups opposing Route E2, that IF&G has been actively involved in	

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			the DEIS and publically supports the alternative C3 Route. This position was articulated by the local activists within days of the DEIS being released. It seems incongruous to us that the IF&G has taken a position even before the Agency purportedly received the document. Of greater concern, however, is our fear that the squabbling between IF&G and ITD will lead to further delay, deaths, injuries and damage. – We respectfully request that the Commission and Agency management give serious attention to this matter; assure that local F&G personnel involved are not articulating, nor promoting, personal views on behalf of the Agency; secure an agreement with ITD that fairly mitigates those legitimate IF&G concerns; and allow the new highway to be built as soon as possible. – Thank you for your prompt attention to this serious matter important to all users and residents on this dangerous section of US Highway 95. – Sincerely, – Ian von Lindern For Citizens for a Safe 95 – Cc: Director and Board of ITD Office of the Governor Latah County Commissioners –	

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			Citizens for a Safe 95 3697 Highway 95 Moscow, ID 83843 – March 22, 2013 – Adam Rush Idaho Department of Transportation Public Involvement Coordinator P.O. Box 7129 Boise, ID 83707-1129 – Dear Mr. Rush: Citizens for a Safe 95 is a group of more than 90 landowners who own, rent, and reside on property impacted by one or more of the alternative alignments assessed in the Thorn Creek-to-Moscow Highway 95 Draft Environmental Impact Statement [DEIS]. Collectively, we own more than 80% of the property ITD needs to acquire for any of the proposed new routes. We previously supplied ITD with a map showing our supporters (an updated version is attached). We believe the ITD has done a comprehensive, detailed, and thorough job with the DEIS. We unanimously support the Preferred Alternative—Route E2. Everyone signing this letter is a landowner, tenant, or business owner* in the area affected by one or another of the proposed routes for the new section of highway. We have followed this project—closely—since the late 1990s. For many of us, the uncertainty about where this highway will go has	

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			interfered with the use and disposition of our property for a decade. More importantly, we and the thousands of vehicles that travel Highway 95 daily have endured a dangerous roadway for too long. There are numerous reasons why we believe E2 is the best alternative and some are listed below. But the bottom line is we support Route E2 because it is the safest, least disruptive, and least expensive alternative. ITD's DEIS has done a remarkable job in identifying and assessing the potential impacts of the alternative routes. We recognize that there will be adverse effects with any route. But the positive aspects of replacing the current highway far outweigh any of the potential ill effects. Nevertheless, we urge ITD to conscientiously mitigate those adverse effects on both the environment and impacted homeowners. With respect to the environment we believe that appropriate mitigation of the impacts to wildlife, biologic resources, and landscape can be accomplished and—possibly—enhanced with Alternative E2. We support, and many of our members would be willing participants in, programs to preserve and improve habitat in the corridor. We strongly believe ITD should ensure that environmental mitigations be local and serve to replace the resource in this area, rather than cash payments to another agency. With respect to the acquisition of private property, we similarly believe that any relocation or purchase should also be on the basis of replacing like	

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			property. Over the last decade many homes in the area have lost value due to the uncertainty in this decision. We believe it would be unfair for ITD to benefit by lower condemnation compensation to homeowners who have suffered diminution in value due to ITD's delays. Regarding those who will be relocated or will lose significant portions of their property, we encourage ITD to assist them with sufficient compensation in order to obtain comparable property elsewhere and maintain their quality of life. We are willing and anxious to cooperate with ITD in "fine-tuning" Alternative Route E2 and the acquisition of the new right-of-way. However, the process of taking our land must be *completely* necessary and *fairly* compensated. We support Alternative E2 because we are convinced that this section of Highway 95 must be made as safe as possible for the thousands, ourselves included, who use it daily, and it must be built as quickly as possible. ITD has done a commendable job on this DEIS and of responding to all the complaints and comments that dangerously stopped this project years ago. ITD is now recommending the only route that: avoids lethal Reisenauer Hill; provides the straightest route that avoids prime farmland; has the support of the landowners/farmers who own that land; impacts the least number of homes and businesses; provides the fewest and safest accesses;	

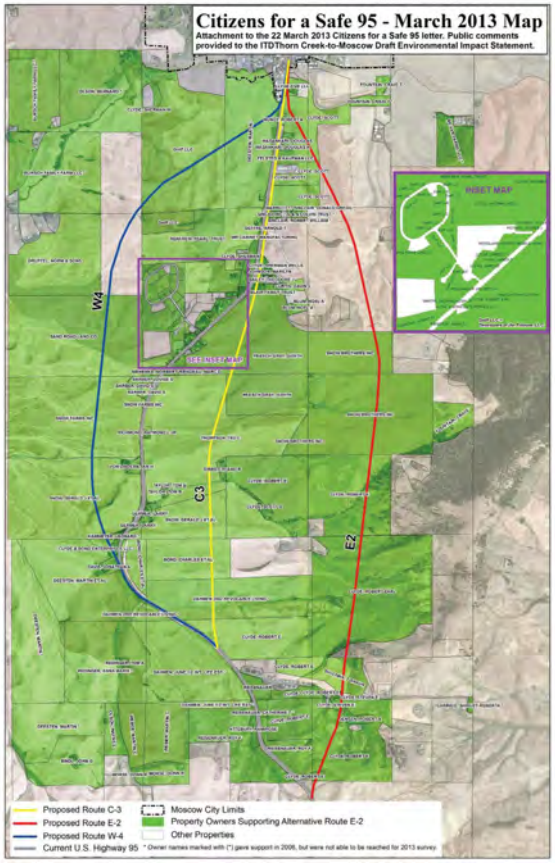
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			has environmental impacts that can be effectively mitigated locally; does not have an impact on an endangered species; avoids historic preservation issues; is the safest and most cost-effective route. We congratulate you on a job well done in the interest of all those who traverse this beautiful state and who value the Palouse in particular. Many of those opposed to Alternative Route E2 claim to do so in the interest of Paradise Ridge. But in reality, these opponents are attempting to prescribe what to do with someone else's private property. We, Citizens for a Safe 95, are also environmentally sensitive: it is our land and we are responsible stewards. This highway has and will continue to pass through our property. We appreciate the character of and the importance of Paradise Ridge to the community. Many of us would rather not see Paradise Ridge developed; but residential encroachment on farm and woodlands on the Ridge is a private property issue, and a far greater endangerment to habitat than this highway. We ask that ITD proceed with Alternative Route E2 and respect the concerns of those who must give up their homes and property for the safety of those who use Highway 95. We urge you to listen to and consider the comments of all citizens, develop an effective mitigation strategy for the Preferred Alternative Route E2, publish the Final EIS selecting Alternative Route E2, and move forward with design and construction that minimizes the adverse impacts to	

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			the landowners affected. Too many have suffered in this decade of delay. – Sincerely, Citizens for a Safe 95 Beverly Anderson (hand-signed) Rami Attebury rosebudy23@gmail.com Ted Bailey tnbailey@juno.com Norma Bailey tnbailey@juno.com David Barber dbarber@uidaho.edu John Bindl bindlfarm@msn.com Rita Bindl bindlfarm@msn.com Don Blair sblair@turbonet.com Sandy Blair sblair@turbonet.com Noel A. Blum cblum3@gmail.com Cindy Blum cblum3@gmail.com Dan Carter carter4moscow@yahoo.com Dana Carter carter4moscow@yahoo.com Nancy Carter carter2122@roadrunner.com Jim Christiansen jimlchristiansen@gmail.com Robert Clyde pclyde@moscow.com Patricia Clyde pclyde@moscow.com Scott Clyde pclyde@moscow.com Steve Clyde pclyde@moscow.com Clyde & Bond Enterprises LLC pclyde@moscow.com Clyde 5 LLC pclyde@moscow.com Sherm Clyde clydesantiques@yahoo.com Jan Clyde clydesantiques@yahoo.com Gavin Curtis gavincurtis@yahoo.com Jon Davis j-cmailcdavis@roadrunner.com Christa Davis christadavis@vandals.uidaho.edu Louise Davison lmdavison66@gmail.com	

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			Developers of the Palouse (hand-signed, Larry Germer) Norm Druffel njdruffel@pullman.com Jessie Druffel njdruffel@pullman.com Norm Druffel and Sons njdruffel@pullman.com Wayne Druffel njdruffel@pullman.com Roy Druffel njdruffel@pullman.com Ken Druffel njdruffel@pullman.com Mark Druffel njdruffel@pullman.com Jack Flack sflack@moscow.com Suzie Flack sflack@moscow.com Snow Farms, Inc. sflack@moscow.com Rick Flomer rflomer@turbonet.com Ella Fountain (hand-signed) Don Frei DonF@turbonet.com Willa Geffre (hand-signed) Chip Geffre cgeffre@turbonet.com Maria Geffre cgeffre@turbonet.com Larry Germer (hand-signed) Lee Gibbs lgibbs@zionsbank.com Rhua Gibbs gibbs1973@gmail.com Del Hungerford delh@uidaho.edu Robert Jensen (telephone consent) Terry Johnson-Huhta thuhta@moscow.com Marilyn Johnson (hand-signed) Tony Johnson johnsonexc@moscow.com Michael Kaufman (telephone consent) Bill Mabbutt gemstate@frontier.com Diane Mabbutt yotie7@gmail.com Hugh Martin bikergrammy2@gmail.com Linda Martin bikergrammy2@gmail.com Neil Marzolf neilmarzolf@yahoo.com	

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			George Masters kittymas@roadrunner.com Kitty Masters kittymas@roadrunner.com Frank Merickel fcmerick@moscow.com Cathy Merickel cmerick@uidaho.edu Donn Morse donnmo@lewiston.com Lisa Morse lisamo@lewiston.com Mundy's Machine and Welding mundys@frontier.com Al Mundy mundys@frontier.com Dayle Mundy mundys@frontier.com Norb Niehenke njniehenke@directv.net Janell Niehenke njniehenke@directv.net Wayne Olson olson.wayne.moscow@gmail.com Annette Olson atolson@hotmail.com Judith Paasch-Gray (telephone consent) Steve Potratz potratz6@msn.com Ellen Potratz potratz6@msn.com Steve Redinger sredinger@metriguard.com Barbara Redinger barb.redinger@johnstonesupply.com Tom Redinger(hand-signed) tomredinger7@frontier.com Delbert Reisenauer (hand-signed) dedobe1@hotmail.com – Roy Reisenauer (personal contact) Ray Richmond richmond@moscow.com Nancy Richmond richmond@moscow.com Marc Riendeau (hand-signed) Brenda Riendeau (hand-signed) Sand Road Land Co. njdruffel@pullman.com Don Sinclair d_g_sinclair@msn.com	

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			Mike Snow (hand-signed) Tom Taylor (hand-signed) Ted Thompson (telephone consent) Margrit von Braun vonbraun@uidaho.edu Ian von Lindern ian.vonlindern@terragraphics.com Wasankari Construction brecycler@hotmail.com Stacey at Wasankari badpirates@hotmail.com – Martin C. Weber (telephone consent) Woodland Heights Mobile Homes (telephone consent, James Schleuter) *The following represent those who do not own or rent in the area of impact but drive, or have driven, the highway repeatedly; the list also includes those who no longer live along the highway. The following all agree with support for E2: Christopher Barber cmbarber@hotmail.com Leslie Barber leslies@gmail.com Steve Barber sfbarber19@gmail.com Thomas Barber thomash.barber@gmail.com Benjamin Bailey Ben.Bailey@terragraphics.com – Joanna Bailey redfernlibrarian@gmail.com Steve Barr daneswb@hotmail.com Jim Bielenberg jim.judy.bielenberg@gmail.com Judy Bielenberg jim.judy.bielenberg@gmail.comLeNelle McInturff lenellem@moscow.com Esme Weigand esmeschwall@gmail.comJonathan Weigland jon.weigand@gmail.com	

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L-34	Margrit	VonBraun	Friends of Highway 95 Notes on the Upcoming Hearing from Ian von Lindern I have completed my review of the entire ITD Environmental Impact Statement (EIS) report and find it to be perhaps the most comprehensive environmental analysis per mile of highway ever accomplished in Idaho.	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response NEPA and Schedule regarding the environmental process and the anticipated schedule. Property and Safety Issues for the People Who Live

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			The alternatives are well-researched and conclude, much as in the last round in 2003, that route E2 along the base of Paradise Ridge is the safest, shortest, least expensive, and least disruptive alternative. Nevertheless, the Paradise Ridge Coalition promises to mount vigorous opposition based on perceived, but often unsubstantiated, potential environmental impacts. This group can mobilize more people than there are residents in the study area. As we are limited to those who are directly impacted, we cannot match them in numbers because most of their support comes from outside the Study Area. We, however, have the facts on our side. ITD recognizes this in the draft EIS and has identified E2 as the preferred alternative. We need to support ITD, commend them for their thoroughness, encourage them to mitigate any adverse effects, and urge them to move forward ASAP to produce the Final Environmental Impact Statement without further delay. Margrit and I are, unfortunately, out of town for the hearing on January 23, and several other members of our group are also unable to attend. Those who can go to the hearing should attend, listen politely to ITD's presentations, and offer 1 to 3 to (perhaps) 5 minutes of oral testimony during the open microphone. Your comments can be extemporaneous, or you can read a short statement if that is more comfortable, or offer written testimony. Be sure to indicate that you might offer	There ITD recognizes that the landowners who live within the project area and would be directly affected support the E-2 Alternative and the majority of those supporting the C-3 Alternative reside outside of the project area and would be indirectly affected. However, through the EIS process ITD is required to consider all substantive public and agency comments regardless of whether the commenters live within the project area. The improvements to the roadway would benefit all of the traveling public. The impacts to farms, residences and businesses are considered very important in the decision-making process. During the right-of-way and design processes when detailed geotechnical and survey data is available, and should an action alternative be selected, then ITD would work closely with impacted landowners on right-of-way, access and design details. Any relocation or acquisition will be conducted fairly and equitably according to the Uniform Relocation Act. See Appendix 5 Safety and Delay See General Response Schedule for a description of the environmental process and the anticipated schedule. In response to public comments, the comment period was extended to March 23, 2013. The Safety Analysis has been revised since the DEISwas published but the findings remained valid. See General Response Safety-3. Private Property and Land Use Disruption Issues General Response Displacement-1 offers clarification regarding residential and business impacts. All affected

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			more thoughts later in additional written testimony. We should do this, if for no other reason, to keep the opponents from monopolizing the conversation and the microphone. After the hearing we should meet as a group prior to the February 23 closing of the comment period. We can then help each other to provide conscientious written testimony to support our position and help ITD to move this process forward. Because the draft Environmental Impact Statement supports our position, you can take your testimony directly from ITD's summaries. Use those materials they have sent you, or use some the quotes from the document below. Feel free to use anything you like. There are a couple of areas where ITD did not do enough as I discuss below. I suggest we emphasize these in our formal written statements. These have to do with failure to recognize the impacts on people who own, and live on, the land actually touched by these routes - as opposed to Moscow people and outsiders - who are trying to dictate other people about the use of their private property. Be sure to mention in your testimony that you are one of those who lives there, does business there, have your lifetime investment there, pays taxes on this property, and lives on and uses this highway every day. Property and Safety Issues for the People who live there. There are two categories of issues that ITD does not appropriately emphasize. Both have to do with the	landowners and residents will be compensated according to the Uniform Relocation Act. See FEIS Appendix 5, Uniform Relocation Act. General Response Displacement-1 offers clarification regarding residential and business impacts. General Response Access provides updated information regarding Access Control for the action alternatives. Additional information regarding Visual Impact has been the added to the FEIS Section 4.11. As a correction, while the C-3 Alternative would be very close to one National Register eligible resource, it would avoid physically impacting it. The summarized information from the DEIS is accurate with the following clarifications: The Safety and Weather Analyses were revised but the findings remain valid. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). See General Response Weeds and Wildlife regarding Paradise Ridge and Palouse remnants. ITD has met with IDFG and come to an agreement on mitigation measures as described in Chapter 9 Environmental Commitments. ITD is committed to continue to work with IDFG and other resource agencies throughout final design and project implementation to further refine the mitigation measures described in Chapter 9. See General Response Agency regarding the disagreement between ITD and agencies regarding ITD's Preferred Alternative.

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			impacts to those property owners and residents that live within the areas impacted by the decision and those local residents who travel this highway system on a daily basis. These residents and property owners overwhelmingly support Alternative E2 because it directly affects their everyday home life. In contrast, most of those that oppose the E2 alternative largely live outside the Study Area, do not own property directly affected by the alternative routes, and are concerned about indirect effects on Paradise Ridge, much of which is on the periphery or outside the Study area. Safety and Delay Issues *No More Delay*. This decision process has been going on for nearly 20 years. This is one of the most dangerous stretches of major highway in all of Idaho, and the most dangerous in our region, extending from Benewah County to Riggins. Too many people have died and suffered severe injuries while this delay has proceeded. Our friends and neighbors continue to use this road every day and our families are at unnecessary risk. There should be no further delays. The safest road possible should be built ASAP. Any extension of the review period or more litigation should be discouraged. *Safety is the Main Issue*. Three of the top thirteen most dangerous half mile segments in all of Idaho highways are found in these 5 miles. Considering Idaho's terrain and climate, this is remarkable. The high accident rates are due to too many private accesses, curves, hills, bad weather conditions, and ever increasing traffic volume. Five fatalities and 18	

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			severely debilitating injury accidents occurred since the current court imposed delay, nearly ten years ago. Most of us will remember the young area family lost on Reisenauer hill not included in these statistics. The preferred alternative, Route E2 is the safest and is estimated to reduce accident rates by 69%, the most of any alternative. That would have translated to four less deaths, 13 less severely debilitating crashes, and 150 less accidents over the past ten years. More of these tragic crashes are projected to occur in the future, as traffic volume increases. *E2 is clearly the Safest Alternative.* It is the straightest, flattest, shortest, least expensive route; with the fewest accesses, and least poor weather conditions. E2 is the only alternative that eliminates Reisenauer Hill, minimizes curves, has the minimum number of accesses and is most favorable for conversion to "no access" status for the next generation of highways. Private Property and Land Use Disruption Issues *E2 is the Least Disruptive Alternative*. Nearly all the land in the corridor is private property. The owners of more than 80% of the land directly impacted by the three alternatives have notified the ITD that they prefer alternative E2. E2 is less disruptive of local businesses; minimizes residential and business relocation, and the number of remaining homes and businesses that must access the highway directly; results in the least fragmentation of farming operations; best preserves, protects and services the current agricultural practices in the	

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			area; and is the least likely to encourage suburban encroachment into some of the best farmland in the northwest. The vast majority of farmers impacted by all three routes agrees that E2 is the best alternative and least interferes with their operations. *Paradise Ridge is Private Property.* Most of the opposition to Route E2 centers around potential impacts to wildlife, remnants and restoration of native prairie, and visual effects on Paradise Ridge. These alleged effects occur on private land at the base of the ridge on the periphery of the study area, or largely outside the study area on the ridge itself. All of this land is private property. Currently, the ridge is subject to considerable pressure for residential development, is becoming less accessible to the public, and less hospitable to wildlife. As the ridge area continues to develop and is fragmented into suburban homes and lots, human interaction and habitat loss will be particularly significant with respect to big game and predator species, and predation and disturbances by suburban pets will more adversely affect these and other non-game populations than the proposed highway. This trend is likely to get worse in the future. *Stewardship of Paradise Ridge*. Most of the landowners on and adjacent to the ridge are responsible stewards and many generously have allowed public access to their property for generations, although no trespassing signs are becoming more prevalent. With respect to prairie	

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			restoration, significant portions of these efforts are being undertaken by landowners who support alternative E2. Many of these owners view alternative E2 as a restraint on ridge development and suburban encroachment from the west. They believe locating the highway at the base of the ridge may, in the long run, better preserve the current environment. However, it must be remembered that all of these efforts are voluntary. There are no guarantees that future owners and potential development will decide to ensure the perceived character of the ridge, sought by the opponents of this Alternative E2. *Quarreling Views of the Ridge*. With respect to visual effects, the perspective of those who look at the area differs 180 degrees from those of us who look from within the area. Those who view the ridge from the urban area of Moscow believe the highway at the base of the ridge will diminish their view. Landowners from the area believe the view from alternative E2 will enhance the view to the west and be an attractive gateway to Moscow. *Environmental Mitigations Required and Proposed.* The required and proposed mitigations to offset adverse environmental effects are nearly identical for all three routes as follows. C3 actually requires the most mitigation, including the only cultural heritage impacts. E2 has the largest wildlife impact associated with a stand of Civilian Conservation Corps (CCC) timber, planted in the 1930s, that may be habitat for three species of potential concern (bat, songbird and lizard). W4. incidentally. is the	

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			route that potentially most impacts the only endangered species found in the study area, and more CCC and earlier (1904) conservation tree plantings will be destroyed. W4 - 29 mitigations required C3 - 30 mitigations required E2 - 29 mitigations required – *End of My Discussion* ITD Summaries The following points are direct quotes from the report. You will also find these in the Executive and Brochure Summaries provided by ITD. Please feel free to copy these directly to include in your testimony. History In 1999, FHWA and ITD began developing an Environmental Assessment (EA) for a 20.4 mile improvement of US-95 from the Top of Lewiston Hill to Moscow. Alternative 10A was selected by ITD and FHWA and a Finding of No Significant Impact (FONSI) was issued in May 2002. The project was litigated by the Paradise Ridge Defense Coalition, Inc. in 2003. The court found that an Environmental Impact Statement (EIS) would be required for the northern 4.6 mile segment between Thorncreek Road and Moscow to allow full consideration of the impacts by the public and agencies. The southern 15.8 miles was allowed to proceed and construction was completed in October 2007. Accidents	

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			The crash statistics for the highway between 2001 and 2010 show that this section of US-95 averages 22.0 crashes per year and is expected to reach 24.8 crashes per year by 2017. Three High Accident Locations (HALs) are located within the project limits (see Table 31. High Accident Locations (HALs). These segments have the highest crash rates in ITD District 2 and are in the top 13 highest crash locations in the State of Idaho. The crash rates in these locations and throughout the corridor are expected to increase as traffic volumes increase (ITD 2012a). Between 2002 and 2011 approximately 40 percent of the accidents in the project area occurred while a driver was negotiating a curve. Most severe in head-on collisions occurred while passing and private accesses. Most accesses and curves in C-3. Most associated with inclement weather. Worst weather in W-2, Icy road conditions may result from condensation on road surfaces during freezing conditions. Reisenauer Hill, had the highest total number of hours with frost conditions, followed closely by the western corridor. The southern portion of the study area has the most severe frost conditions. E-2 and C-3 are included in the eastern corridor for weather and would both have less than half the number of hours with frost conditions than Reisenauer Hill and the western corridor. The frequency of wild animal crashes in the project area is much less than many other sections of US-95 and many other highways in Idaho (Ruediger 2007). Crash data from 2002 thru 2011 indicated that	

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			there were 437 wildlife crashes along US-95 in District 2. Of those, 37 occurred within the project limits. None involved injuries. Based on the low severity and randomness of the wildlife crashes, they are not anticipated to be a primary factor in the evaluation of the alignment alternatives. Table 1. High Accident Locations (HALs) *Milepost/Location on U.S. 95/Idaho HAL Ranking* Mile Post 337.67- 338.17 Danger Ranking Statewide 6 Mile Post 338.67- 339.62 Danger Ranking Statewide 13 Mile Post 340.62-341.12 Danger Ranking Statewide 4 The Alternatives The No Action and 10 Action Alternatives were identified and categorized into the western, central and eastern corridors. One alternative from each corridor was forwarded for detailed analysis to give a range of alignment alternatives. W-4 W-4 is aligned west of existing US-95. W-4 would displace fewer residences than C-3 or E-2 and would have similar effects to hazardous materials compared to E-2. W-4 would have the greatest effects to wetlands, floodplains, and cultural/Section 4(f) resources. It would have the greatest number of tributary crossings and would require the greatest amount of new right-of-way. W-4 would not affect potential long-eared myotis, northern alligator lizard, and pygmy nuthatch habitat associated with ponderosa pine stands near	

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			Paradise Ridge. Of the alternatives, W-4 would be the least consistent with the land use plans. C-3 The C-3 Alternative would run closest to the current highway and would utilize much of the existing US-95 alignment. It would have the highest crash rate of the Action Alternatives. The primary differences between the C-3 Alternative and the other Action Alternatives are that C-3 would require the least amount of new right-of-way compared to W-4 and E-2 but would have the greatest business displacements. Similar to E-2, C-3 would avoid cultural/Section 4(f) resources and would have the same number of tributary crossings. However, it would affect approximately three times the length of tributary channel compared to the E-2 Alternative. It would avoid the pine stands that are potential Pygmy nuthatch, northern alligator lizard, and long-eared myotis habitat similarly to W-4. C-3 would also have the least wetland effects. It would have the greatest effect to residences, businesses, and hazardous material sites. *E-2 (Preferred Alternative)* E-2 is aligned east of existing US-95. The primary advantages of E-2 are that it is aligned through flatter topography, has the fewest number of approaches, and has the greatest safety improvement compared to the other Action Alternatives. E-2 would affect the least amount of tributary channel and would avoid floodplains. Similarly to C-3, it would avoid cultural or Section 4(f) resources. The primary disadvantage of E-2 over	

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			the other alternatives is that it would be located closer to the base of Paradise Ridge and closer to moderate wildlife habitat. E-2 would affect pine stands that are potential long-eared myotis, northern alligator lizard and pygmy nuthatch habitat. It would also have the highest noise impacts of the action alternatives. Preferred Alternative E2 The evaluation of effects during the screening process and the detailed analyses presented in this DEIS resulted in the lead agencies, FHWA and ITD, identifying the E-2 Alternative as the Preferred Alternative. The final selection of an alternative will not be made until the alternatives' effects and comments on the DEIS from the public hearing have been fully evaluated. The E-2 Alternative is identified as the Preferred Alternative for the following reasons: • It would have the greatest safety improvement. • It would have the fewest access points and at-grade county intersections. • It would have the least effect to streams. • It would avoid effects to cultural/Section 4(f) resources, businesses and floodplains. • It would have the shortest length with the shortest travel time. • It would have better weather conditions for driving than W-4. • It best meets the project purpose and need. Controversies that were Studied Extensively During the public and agency involvement processes, it became evident through repeated	

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			written and verbal comments, that there were specific concerns and controversy related to the following topics: • Effects of the E-2 Alternative on Paradise Ridge including effects to the Palouse remnants, potential wildlife effects and mitigation for wildlife impacts • Effects of weather on safety within corridors • Visual impacts to Moscow residents In response to public and agency concerns, FHWA and ITD prepared detailed studies on wildlife habitat, wildlife movement, weather, and visual quality. *Wildlife Habitat and Wildlife Movement*. IDFG, EPA and USFWS prefer the C-3 Alternative to the E-2 Alternative. This is primarily due to the perceived effects of the E-2 Alternative on wildlife habitat and movement based on its proximity to Paradise Ridge. The primary reasons that C-3 was not identified as the Preferred Alternative is because it would have the highest crash rate with the greatest number of at-grade access points compared to the other Action Alternatives and would have the highest business and residential displacements (eight businesses and seven homes). IDFG proposed that ITD deposit funds into a bank or trust, to be used to purchase easements, complete habitat improvements in the Palouse region, or other activities that would benefit wildlife in the Palouse Ecoregion. IDFG proposed $500,000 for W-4, $325,000 for C-3 and $750,000 for E-2 depending on the selected alignment alternative. The studies concluded that wildlife species including	

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			ungulates, may utilize the project area which offers low to moderate quality habitat for wildlife. The eastern corridor has more suitable habitat than the central or western corridors. More suitable habitat is available north, south and east of the project area or concentrated in the gullies (Ruediger 2007). The studies concluded that none of the Action Alternatives would bisect important ungulate habitat or known migration corridors and that population-level effects from highway construction were unlikely. *Weather Conditions*. During the public meetings held from 2004 to 2006, weather as it pertained to safety was a major topic of concern. The public expressed concern that the topographic differences between the alternative corridors (west, central and east), could result in differing climatic conditions that could influence safety. To respond to this concern, a detailed weather analysis was developed that evaluated the differences in the weather in three corridors. The study measured wind speed, precipitation, snow, and road ice over the five month winter period. The study concluded that while there may be minor variations in climatic conditions in the corridors, they were not substantial. – The improvement of the lane widths, clear zones, steep grades and curves are more influential factors to safety. Therefore, weather was considered when developing the design elements but will not be a major factor for comparing the alternatives.	

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			– *Visual.* There are differing opinions regarding the visual effects of the W-4 and E-2 alternatives. The Citizens for a Safe Highway 95, claiming to represent people collectively owning 80 percent of the land along E-2, were in favor of the E-2 Alternative due to the "spectacular view" of the Palouse and of the City of Moscow for travelers. They believe that the beauty of Paradise Ridge could transform the highway into a gateway for Moscow, and that E-2 could promote and preserve the Palouse landscape through scenic highway status. The group opposed alternative W-4, stating that it would disrupt westerly views and promote farmland conversion disrupting the agricultural setting (HDR 2005a). The Paradise Ridge Defense Coalition, who opposed the E-2 Alternative, felt the expansion of the roadway should follow the existing route as much as possible in order to minimize the ecological footprint of road. In the view of those opposed to an E-2 alignment, the ridge should remain untouched because it provides both aesthetic and environmental value as the last remaining natural prairie in the area (HDR 2006). Safety E-2 would result in the greatest travel time reduction. Shortened travel times could improve the economic vitality of the area and could benefit freight transport, emergency service response, school access, bicyclists/pedestrians, and mail delivery.	

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			The C-3 Alternative would have the highest predicted fatal, injury and total crashes of all the Action Alternatives. The C-3 Alternative would be the least safe because the extra intersections, approaches, and suburban section would create turning traffic across US-95. The E-2 Alternative would have the shortest alignment, the fewest public road intersections, the fewest commercial and residential approaches and would have better weather conditions for roadway safety compared to W-4. E-2 would also have the greatest length of the four lane divided highway. These factors all contribute to E-2 having the lowest predicted crash rate compared to the other alternatives. The E-2 Alternative is predicted to reduce the crash rate of the existing alignment by about 69 percent. The W-4 Alternative would encroach upon approximately 1.73 acres of the Desteen/Davis Farmstead. This encroachment would not adversely affect any of the historic buildings but would remove several of the trees which were planted in the 1930s by the Civilian Conservation Corps. These trees provide a partial visual screen between the roadway and the farmstead. Removing the trees could alter the views of the farmstead adversely affecting the setting. Acquiring right-of-way and removing the trees would result in a Section 4(f) use. There are approximately 2.23 acres of Wetland 9 within the boundary farmstead. The W-4 Alternative would affect 0.84 acres of the wetland located on the farmstead. See Sections 3.6 and 4.6 for a discussion of wetlands.	

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			– W-4 would have increased noise and visual effects to the University of Idaho Arboretum, located on a hill approximately three-quarters of a mile north of W-4. It would have potential effects to the planned ball fields and nearby senior center on the southwest side of Moscow approximately one-half mile north of W-4. W-4 would also have potential noise and visual effects to a master-planned community approximately one-quarter mile north of W-4. A new development planned near the C-3 Alignment could potentially increase traffic and traffic related conflicts and access issues in the area. C-3 would have indirect effects to businesses and approaches along the existing US-95 alignment. – The primary indirect effect of E-2 would be a visual effect to residents on Paradise Ridge due to the roadway alignment and acceleration of development. There could be more conversion of farmland up to one mile south of Moscow where growth is predicted with any of the alternatives. W-4 could result in greater indirect effects compared to the other alternatives because there are larger tracts of farmed land on the western corridor compared to the farmland near the E-2 corridor. The rate of farmland conversion for W-4 could also be expected to be higher because it would be closer to the universities, more accessible to the cities and closer to planned developments. – The floodplains (and a regulatory floodway) in the	

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			project area are concentrated at the north end of the project within the Moscow Area of Impact where growth is expected and along the W-4 alternative. There While none of the alternatives would directly affect federally listed threatened or endangered plants, they would bring the road closer to the Spalding's catchfly population and Palouse remnants. This could introduce weeds or have other indirect effects that could affect Spalding's catchfly plants found near the project area. The distance of each alternative from the Spalding's catchfly plants are shown in Table 63. Alternative Distances to Spalding's Catchfly. The project May Affect but is Not Likely to Adversely Affect (NLAA) Spalding's catchfly due to these potential indirect effects. See Biological Assessment Technical Report. Measures that will be taken to minimize harm are described in Chapter 9, Environmental Commitments. Habitat loss and fragmentation resulting from the increased development on Paradise Ridge will continue, irrespective of the construction of the highway. Because deer commonly feed on lawns, ornamental plants, and fruit trees, the effects on deer would be minimal as deer thrive near humans. However, moose would likely be negatively affected as complaints by homeowners that moose are eating ornamental shrubs in their yards or tearing down fences often lead to the removal of animals. In the Paradise Ridge area, if removal exceeds replenishment from immigration, moose would become temporary and intermittent residents.	

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			Finally, thousands of acres of public lands with more suitable wildlife habitat are available north and east of Paradise Ridge and just over the Washington State Line. Because of the abundance of suitable habitat and the abundance of species, there is not expected to be substantial cumulative effects to wildlife and the effects would not reduce population viability. Table 65. Cost Estimate for Alternatives No Action Construction Costs minimal Total Costs minimal W-4 Construction Costs $52M Total Costs $62M C-3 Construction Costs $43M Total Costs $58M E-2 Construction Costs $46M Total Costs $55M *Note: The estimated cost includes excavation, rock ballast, plant mix, structures.	
L-35	Palouse Prairie Foundation Board of Directors	–	Palouse Prairie Foundation P.O. Box 8953 Moscow, ID 83843 ppf@palouseprairie.org www.palouseprairie.org – March 18, 2013 Idaho Transportation Department Office of Communications P.O. Box 7129 Boise, ID 83707-1129 Palouse Prairie Foundation comments on ITD's US	We appreciate the thorough background that you provided regarding the efforts of the foundation and the diversity of the Palouse prairie. ITD recognizes that the Palouse Prairie is considered by many agencies to be a highly endangered ecosystem as stated in the DEIS and FEIS Section 3.8.3. Additional detail regarding the species diversity of the prairie, the social, cultural and biological values, including the function of CRP and other matrix habitats, including grassland that was not categorized as remnants has been added to the FEIS. Information regarding traffic noise impacts to birds, additional occurrence data for the giant Palouse

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			95 Thorn Creek to Moscow Draft EIS Due to the expected impacts on Palouse Prairie, the Palouse Prairie Foundation Board of Directors opposes the E2 alignment and we insist that the Idaho Transportation Department select an alignment that is less harmful to Palouse Prairie and the Paradise Ridge ecosystem. As we are commenting on your DEIS, allow us to provide a little background on our organization. The Palouse Prairie Foundation (PPF) is a nonprofit organization dedicated to the preservation and restoration of native Palouse Prairie. The PPF's Board of Directors has considerable knowledge of the Palouse Prairie ecosystem and hands-on experience with its restoration. The PPF has an active membership that draws from multiple counties in the region and a mail list that reaches hundreds in multiple states. Our members include home owners, prairie enthusiasts, farmers, conservationists, teachers, students, scientists, agency personnel, etc. The PPF has an active outreach program with a high traffic website, a quarterly newsletter, and regularly scheduled presentations and workshops. The PPF also administers a mini-grant program to foster conservation, restoration and education activities pertaining to Palouse Prairie. The PPF is actively involved in shaping policies to conserve Palouse Prairie at the county level. For example, recent amendments to the Latah County Comprehensive Plan, and expected revisions to the Whitman County Critical Areas Ordinances, are the	earthworm and importance of pollinators has also been considered. See General Response Weeds. To offer additional detail regarding weed establishment and dispersal, we also incorporated more information from the Vegetation Technical Reports into the FEIS. These are concentrated in the FEIS Sections 3.8, 4.8 and Chapter 6, Indirect and Cumulative Effects. None of the action alternatives would directly affect Palouse remnants; however all alternatives including the No Action Alternative would have indirect effects. Weed dispersal and establishment can also be increased by other land uses such as residential development. Should an action alternative be selected, ITD will implement mitigation measures as outlined in Chapter 9, Environmental Commitments. ITD will collaborate with IDFG, USFWS, NRCS, and Conservation District staff during the design process to ensure successful mitigation for potential weed impacts. Mitigation for weed dispersal and establishment will involve minimizing soil disturbance, revegetating bare soils to reduce risk of establishment, and species selection that will consider quick and sustainable groundcover. Additional mitigation measures are described in the FEIS Chapter 9, Environmental Commitments ITD will employ consultants when necessary who have expertise and knowledge of mitigation measures and species or environmental resource the mitigation measure is for. Mitigation measures are included in project costs. ITD and FHWA received a report Conservation of the Palouse Prairie Ecosystem - Phase 3 (Hill, 2011) and associated GIS information from USFWS. It contained information on

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			product of PPF's local partnerships and efforts. The PPF played a key role in helping Whitman County to assess impacts of a wind farm (the Palouse Wind Project) on Palouse Prairie, and to develop a mitigation strategy for losses to prairie due to wind farm development. The PPF has been working in partnership with local conservation districts, the Idaho Department of Fish and Game, the Washington Department of Fish and Wildlife and the U.S. Fish and Wildlife Service to develop fine- scale, ground-truthed maps of Palouse Prairie in Latah and Whitman Counties. There have been surveys and inventories of Palouse Prairie within various target areas at various levels of mapping resolutions, including maps by the Natural Heritage Program; the map of prairie remnants in the current Project Area by Lichthardt (2005) that is utilized throughout the DEIS; the land cover map of Black et al. (1998); the survey of conservation priorities for threats to Palouse and Canyon Grasslands by Weddell and Lichthardt (1998); and the recent fine-scale map of prairie in a section of Latah and Whitman Counties by Looney and Eigenbrode (2012). These studies contribute to the science and body of literature regarding the quality and extent of Palouse Prairie. Why the fuss about Palouse Prairie? Well, as is touched upon in the DEIS, the Palouse Prairie once covered hundreds of thousands of acres in northwestern Idaho and southeastern Washington (Noss et al. 1995, Tisdale 1961), and comprised a mosaic of habitats including	species occurrences, plant communities and Palouse Prairie remnants. This information was considered and incorporated in the DEIS. The report and GIS information also includes the previous cited Palouse Prairie and plant data collected in previous years. Information has also been added to Chapter 9 regarding standard specifications and standard operating procedures that are typically included in project contracts, which would also minimize potential indirect effects to Palouse remnants. The statement regarding perceived effects has been revised in the FEIS ES.8. ITD and FHWA received a report and GIS information from USFWS which was considered and incorporated in the DEIS. Additional information has since been provided and is included in the FEIS Section 3.8. The spelling of the genus and species for the giant Palouse earthworm has been corrected in the FEIS 3.8, 4.8 and the General Wildlife Assessment Technical Report (IDFG 2006). Additional information regarding potential effects to the giant Palouse earthworm has been added to the FEIS 3.8 and 4.8. When comparing the GIS data, the PG remnant data, which was provided with the report, were many small polygons of grassland, which encompassed a much smaller area than the remnants that were identified in ITD's 2005 report. Therefore, the 2005 data was used but was supplemented to include two additional remnant areas that were not previously identified.

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			bunchgrass meadow-steppe communities, shrub thickets, open ponderosa pine parkland, low meadows and riparian areas (Daubenmire 1942, 1970). However, with agricultural intensification over the last 150 years, the prairie has been severely reduced and now occupies only a small fraction of its former range (Black et al. 1998). In fact, so much of the prairie has been lost that the Palouse Prairie is widely recognized by scientists as a critically endangered ecosystem with less than 0.1% remaining (Noss et al. 1995, Samson and Knopf 1994, Tisdale 1961). Despite the severe losses to Palouse Prairie and the need for additional studies to adequately describe this ecosystem, it is clear that remnant prairie is a treasure-trove of biological diversity that must be conserved! The prairie is home to several hundred species of flowering plants (Lichthardt and Moseley 1997, Hanson et al. 2008, Skinner and Hall 2011), a number of woody shrub and tree species, perhaps hundreds of species of birds (palouseprairie.org/birds/swift.html), a number of large ungulate species (including deer, elk and moose), and a much larger number of invertebrate species including soil-surface dwelling species (e.g. insects) (Hatten et al. 2006, Looney et al. 2009), arachnids (Hatten unpublished), myriapods, mollusks, soil-dwelling species (micro-flora and micro- and meso-faunae) (Sánchez-de León 2007), canopy species (Looney and Eigenbrode 2011), mycorrhizae, and a vast array of butterfly species (Pocewicz 2006,	

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			Pocewicz et al. 2009, pollinatorwatch.org), and moth (Thompson 2006) and bee pollinators (Hatten et al. 2013, pollinatorwatch.org). Despite the fragmented condition of Palouse habitats, the prairie supports endemic and rare species. For example, found here are a dozen or more globally imperiled plant species with six of these occurring in Idaho (Lichthardt and Moseley 1997), a federally listed (*Threatened*) plant species (Spalding's catchfly, *Silene spaldingii*) (U.S. Fish and Wildlife Service 2007) and the rare giant Palouse earthworm (Sánchez-de León 2007). The western bumble bee (*Bombus occidentalis*) was common on the Palouse and throughout the western USA, but populations of this species have experienced dramatic declines (Cameron et al. 2011) including on the Palouse where it hasn't been found since 1977 (Hatten et al. 2013). However, a population of this species has very recently been discovered in a Pacific Northwest bunchgrass grassland, the Zumwalt Prairie, some 150 miles south of the Moscow-Pullman area (Kimoto et al. 2012). The discovery shows that the species is not extirpated in the Inland Pacific Northwest, and that it may yet be detected in Palouse Prairie or forest communities of the region. Because of this, it is critical to preserve remaining remnants of Palouse Prairie. There are social, cultural and biological implications for those areas on the Palouse with remnant native habitats. Donovan et al. (2009) found that the Paradise Ridge area is both biologically and socially	

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			important, with scenic views, outdoor recreation, and biodiversity of the ridge identified by study participants as important. Less easily defined but equally important to study participants was the "sense of place" and "attachment" that they felt for Paradise Ridge and other butte outcroppings found in the agriculturally- dominated Palouse landscape. During the January 23 public hearing in Moscow, ID for the Highway 95 DEIS, multiple individuals gave testimony to the great significance of Paradise Ridge in their lives. Some said that it was their favorite place to "get away from it all." Others said it was their place to hike, bike and/or ski, and others mentioned birding and botanizing on the ridge and in the prairie. These testimonials and the aforementioned scientific study demonstrate just how important Paradise Ridge and native habitats are for the well being and health of local residents. Thus, the rarity of this habitat with all its diversity of plants and animals, and the love that locals have for it, warrants its protection and restoration. The PPF and other organizations are committed to doing just that. GENERAL COMMENTS ON THE DEIS The difficulty that we have with the ITD's E2 alternative is that it passes too high on the ridge and too close to some of the best and largest remaining prairie remnants in the region. This is stated in the technical reports of the DEIS. We summarize these points here. E2 would: • affect more than twice as many prairie remnants in the project area as would C3 or W4 (24 vs. 14 or	

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			12 remnants, respectively, p. 207, Table 62); • come closer to the largest and highest-quality prairie remnants in the project area (p. 26, Vegetation Technical Report, Lichthardt 2005); • by virtue of point 2 above, put at risk a higher proportion of globally imperiled plant species found in Palouse Prairie than would C3 or W4 (Vegetation Technical Report, Lichthardt 2005); • put a higher number of prairie remnants, including those found on the ridgeline of Paradise Ridge, at risk for weed invasions created by highway construction and vehicular transport of weeds (p. 17, Vegetation Technical Report, Lass and Prather 2007); • put all prairie remnants in the project area at risk for invasion by new weed species from adjacent counties, states and countries connected by the U.S. 95 corridor (Vegetation Technical Report, Lass and Prather 2007). We believe that the ITD deserves credit for all the expertise that was assembled to generate the technical reports and DEIS. However, you consistently fail to heed the advice of your own experts, and fail to acknowledge the devastating consequences that E2 would have on the prairie and Paradise Ridge ecosystem. It is even likely that E2 would affect more prairie than is stated in the DEIS, because the standards used by Juanita Lichthardt (see her Vegetation Technical Report) to map the prairie were somewhat strict, requiring remnants to be 1/10th of an acre or larger and to have greater than 50% of the plant community	

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			weed (i.e. exotic species) free. Ms. Lichthardt provides a rationale for these criteria, and we respect these criteria and those used by the Conservation Data Center during the study. Nevertheless, this methodology may have underestimated the amount of prairie in the project area, and it left out any characterization of matrix habitats that prairie remnants are embedded in. Matrix habitats can allow for movement and use of this habitat by animals and provide varying degrees of habitat connectivity among remnants (Daily 1997, Daily et al. 2001, Looney et al. 2009, Looney and Eigenbrode 2011, 2012, Ricketts et al. 2001). Because E2 would cut right through these matrix habitats, further fragmenting this important portion of the ridge, it is certain that the effects of E2 on prairie, rare plant species and plant communities, wildlife and invertebrates have been underestimated. Mitigation We feel strongly that any compensatory mitigation that is to occur must be open for discussion and clearly articulated prior to the close of the FEIS. Here are a few important points that you must consider concerning prairie restoration. Restoration efforts thus far have been able to re-create only rough approximations of the original Palouse Prairie (professional opinion, PPF Board of Directors). • To do more will take a tremendous amount of time, energy, dedication, and resources. • Some of the parts (especially soil organisms) may	

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			be missing and we may never know what they were. • This makes the existing remnants very valuable, as it is far easier and less expensive to preserve them than to restore them. • Damaged prairie cannot simply be repaired by seeding "native grasses." • The vegetation mitigation suggested in the DEIS is totally inadequate and inappropriate. • The only way to protect the ecosystem is to avoid it during siting, construction, and operation of the highway. • In a letter to ITD, IDFG recommended avoidance of the eastern alignment (E2). "It has been IDFG's position from the start – a position supported by recommendations from the other resource agencies – that the eastern alternative will have the greatest direct and indirect impacts to wildlife and other resources. Avoidance of impact is the primary mitigation tool available." (letter in DEIS) • In a letter to the Federal Highway Administration on March 8, 2004, the EPA notes that avoidance and minimization are the first and second priorities in mitigating impacts. Compensatory mitigation is appropriate only when impacts cannot be avoided or minimized. "We anticipate that avoidance of sensitive, rare, and/or high value terrestrial and aquatic habitats will be the most significant environmental need for this proposed project." (letter in the appendices of the DEIS) • ITD does not have the expertise, the funds, nor the desire to do compensatory mitigation for any	

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			Palouse Prairie impacted by highway construction. Avoidance of impact is the only realistic mitigation available for Palouse Prairie. Avoidance and minimization are best achieved by not building alternative E2! SPECIFIC COMMENTS ON THE DEIS The Palouse Prairie Foundation cannot support alternative E2 because it would pass far too close to Paradise Ridge and thus jeopardize the structure and biological integrity of Palouse Prairie found in the project area. Section ES.8, Topics of Concern or Controversy, page 16: "*IDFG, EPA, and USFWS prefer the C-3 Alternative to the E-2 Alternative. This is primarily due to the perceived effects of the E-2 Alternative on wildlife habitat and movement based on its proximity to Paradise Ridge*." This statement is inaccurate as the USFWS has stated that their concerns over E2 include impacts to Palouse Prairie habitat, wildlife and sensitive plants. The Palouse Prairie Foundation is in complete agreement with the USFWS on this point, so please revise appropriately. Moreover, we object to the wording of this Section, especially the use of the phrase "perceived effects…" We believe that the biologists contracted to do the technical reports for the DEIS, as well as the work of ITD biologists and the opinions of many professionals and residents during past and recent hearings, provide ample evidence that such effects are not just "perceived" and instead are "likely" if not "inevitable."	

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			Lichthardt (2005) shows in the Vegetation Technical Report that four rare plant species tracked by the Conservation Data Center (now the Natural Heritage Program) occur in the project area. Two of these species (Palouse goldenweed and Palouse milkvetch) are 'globally imperiled' and two (Palouse thistle and broad-fruit mariposa lily) are 'vulnerable globally,' meaning that they are endemic and rare. Lichthardt (2005) provides a map of these species' occurrences, and shows that they occur most often east of E2 and closer to this route than the others (Maps 1 - 5). Moreover, most of these populations fall squarely within the 1 km weed infestation zone of Lass and Prather (2007), and thus E2 would have the greatest impact on rare plant species. Furthermore, as Lass and Prather (2007) state that some weed species will disperse more readily in an easterly direction, these rare plant species will be at an even greater risk by every alternative, but especially by E2. Section 2.6, Comparison of Alternatives, E-2 (Preferred Alternative) page 55: "*The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge . . . .*" Alignment E2 is not "closer to the base of Paradise Ridge…", it is on Paradise Ridge and above the base of it! Because of this, ecological effects from E2 would engulf the whole upper portion of the ridge. As shown in Lass and Prather's Vegetation Technical Report (2007), the 1 km weed infestation zone around each alternative will extend to the top of	

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			the ridge if E2 is built. This is a terrible disadvantage of E2 as greater densities, and, almost certainly, new species of weeds would invade this very important area (Lass and Prather 2007), affecting and destabilizing the ecology of the critically endangered Palouse Prairie and all the rare plant species found therein (see discussions below concerning ecological consequences of exotic species). Moreover, while Spalding's catchfly (*Silene spaldingii)* has not been found on the ridge, the ridge is "suitable habitat" (Lichthardt 2005) for the species and the ridge is designated by the USFWS as a key conservation area. Therefore, the ecological disadvantage of E2 is the primary disadvantage of this alignment. This ecological disadvantage is large and should not be ignored! – Section 3.8.2, Methodology, Vegetation Studies, page 95: – The Palouse Prairie Foundation has been a proponent of developing fine-scale, ground-truthed maps of Palouse Prairie. To this end, information was provided to the IDFG and USFWS that was used to develop a map of Palouse Prairie in the portion of Latah County covering the project area. Were these maps not provided to you by the USFWS, and why were they not included or, at least mentioned, in the DEIS? – Section 3.8.3, Existing Conditions, Invasive Plants,	

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			page 100*: Latah County has about 260 listed non-native, invasive plant species that affect agricultural, rangeland, pastures, and forests. Sixty-four noxious weeds are listed in Latah County. Of those, five species of noxious weeds were found in the project area (Lass and Prather 2007)."* – More details from the Vegetation Technical Report of Lass and Prather (2007) need to be noted here. For example, they state that the counties adjacent to Latah have an additional 32 weed species not found in the county, and that Latah County and adjacent counties have 27 highly invasive species in common. Also, please note that Latah county and adjacent counties with Highway 95 passing through them (Benewah and Nez Perce) have 26 highly invasive species in common, and that these and those not found in common will provide a source pool for the project area. – Section 3.8.3, Existing Conditions, General Wildlife Species, page 101: Table 25. Representative Wildlife Species, "Palouse earthworm *Drioleirus amercanus*" – Both the genus and the species epithets of the giant Palouse earthworm are misspelled. – Section 4.8.1 General Wildlife Species Effects, page 163: – Table 47, Representative Wildlife Species Effects, reports "Palouse giant earthworm: No Impact" This	

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			cannot be correct as the assessment by the IDFG is full of inaccuracies, see below. – Table 47 misspells both the genus and the species epithets of the giant Palouse earthworm. The Wildlife Technical Report entitled "General Wildlife Assessment Thorncreek Road to Moscow" states, "Palouse earthworm, *Drioleirus* [sic] *amercanus* [sic]: The Palouse earthworm is endemic to the Palouse bioregion. The species was first reported in 1897, and was described as being common in the area around Pullman, Washington; however, reported occurrences are very rare and there have been no recent confirmed occurrences reported in Idaho. Palouse earthworms inhabit relatively loose, rich soils in undisturbed bunchgrass prairie. Threats include loss of native Palouse habitat to agriculture, development and other disturbances, as well as introduction of European earthworm species (IDFG 2006, p.8)." "Determination of Effect and Rationale: No Effect – • There have been no reported occurrences of Palouse earthworm in the project area. • No remnant Palouse plant communities (suitable habitat) will be effected [sic] by the project . (IDFG 2006, p.8)" – The wildlife assessment (IDFG 2006) states that no suitable habitat for Driloleirus americanus, the giant	

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			Palouse earthworm, will be affected. This information is incorrect and must be corrected and updated. Some of the most recent discoveries of this worm have been from locations on Paradise Ridge and its habitat seems not to be exclusively undisturbed prairie but also transitional zones. – In two separate findings, confirmed giant Palouse earthworms were found on Paradise Ridge in 2012. Moreover, in 2010, two worms (one adult, one juvenile) were found in the large ridge-top prairie on Paradise Ridge by UI scientists. In 2005, a Palouse earthworm was found at Smoot Hill Ecological Preserve in Whitman County in a Palouse Prairie remnant. In 1986 or 1987, about five Palouse earthworms were found near Moscow. Circa 1978 one Palouse earthworm was found near Moscow. Also circa 1978, one Palouse earthworm was found at the top of the Lewiston Grade along U.S. Highway 95. – Section 4.2 Land Use and Recreation Effects, E-2 (Preferred Alternative), page 143: *"E-2 would affect the same types of land use categories as the other alternatives; but would affect more CRP land than other alternatives.*" – Table 42 (p.145) shows that E2 would affect much more CRP land than would C3 or W4 (43.5 ac, 9 ac and 9 ac, respectively). While CRP fields are not always planted to native vegetation, they are always planted to perennial habitat (Fargione et al.	

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			2009). Such habitat helps to make up the landscape (i.e. the matrix) in which native habitats such as Palouse Prairie are embedded. This is important, because matrix habitats can provide refuge, food and movement corridors for remnant-inhabiting animals (Daily 1997, Daily et al. 2001, Ricketts et al. 2001). Multiple studies show that CRP benefits wildlife (Herkert 2007, Fargione et al. 2009, Stanley 2010, Grovenburg et al. 2012). Directly adjacent to the project area, Hatten et al. (2006) found that ground-dwelling beetle species preferentially used reduced-tillage agricultural fields as compared to conventional-tillage fields outside of the prairie, very likely due to the more stable and enriched environment that such fields provide. Moreover, Hatten et al. (2013) found a relationship between numbers of bumble bee species in Palouse Prairie and complexity of the landscape surrounding prairie, consistent with the findings of authors in other regions (Steffan-Dewenter et al. 2002, Hines and Hendrix 2005, Hendrix et al. 2010). These authors found Palouse Prairie to harbor 10 bumble bee species – a sizable number considering that only 50 species are found in the entire United States (Hatten et al. 2013) – and found more of these species in prairie remnants of Latah County that adjoin forest, other remnants and/or CRP grasslands than were in remnants of Whitman County that are bordered more consistently by agricultural fields. The large ridge-top remnant on Paradise Ridge was one of the Latah County remnants sampled by Hatten et al. (2013). This	

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			study suggests that habitat complexity on the granitic outcrops may increase effective patch size of the prairie by providing additional habitat and connectivity for the bees. In addition, Looney et al. (unpublished) found up to 100 species of bees in Palouse Prairie, and found robust populations using CRP fields. Pollinators are increasingly at risk due to habitat loss, deterioration and exotic pathogens (Cameron et al. 2011), and thus perennial and relatively undisturbed habitats such as Palouse Prairie and some matrix habitats are increasingly important for their survival. It is reasonable to expect, then, that greater losses in CRP caused by E2 would affect bee populations as well as wildlife and other animals in the project area, especially when one considers that E2 would come closer to prairie than would C3 and W4 and reduce and further compromise the quality of matrix habitats of the upper ridge where the best prairie and largest populations of rare plant species are found. Despite the importance of matrix habitats to the persistence of flora and fauna of remnant native habitats, it is important to point out that CRP grasslands are not without their problems and they are not a surrogate for native habitat. For example, while CRP provides benefits for wildlife (see previous paragraph), the composition and structure of vegetation in CRP is often dissimilar from that of native grassland/prairie systems (Baer et al. 2004), and does not provide equivalent habitats for some animals such as grassland birds (Bakker and	

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			Higgins 2009). Moreover, Lichthardt (2005, p.10) found that the invasive, rhizomatous exotic species tall oatgrass was frequently abundant in the borders of remnant prairie adjacent to CRP fields in the project area. So, while CRP provides important perennial habitat, it requires management, and it is not a replacement for native prairie. Consider, also, that it is very difficult to restore prairie habitats (Baer et al. 2004); native grasses may be restored relatively quickly, but to establish less common forb species critical to biodiversity is very difficult (Clarke and Bragg 1994, Kindscher and Tieszen 1998). Thus, it is best to avoid disturbing the prairie. – Section 4.12, Noise Effects, page 182. – Where is the discussion regarding noise impacts on wildlife? Multiple studies show that noise is disruptive to wildlife. Forman (2000) found road noise to have a major effect on forest nesting birds due to its interference with bird communication during incubation and fledgling phases of reproduction. – Section 6.1, Indirect effects by resource, Vegetation, page 207: "*Thirty-two areas were identified as Palouse remnants during the 2005 inventory (Lichthardt 2006). The primary threat to the persistence of Palouse remnants in their present state is colonization by weeds; expansion of those present as well as invasion by new arrivals.*"	

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			– This is an accurate statement. However, the potential consequences of weed colonization to the ecological integrity of the 32 prairie remnants in the project area needs to be discussed, and it needs to be discussed throughout the document including in the Cumulative Effects section (6.2.3). There is plenty of evidence showing that exotic species (i.e. weeds) can pose very serious challenges for the conservation of remnant prairie and grassland habitats (Scheiman et al. 2003). Weeds diminish habitat quality and adversely affect biodiversity (Parker et al. 1993). They do so by altering the composition and structure of native communities. With niches to exploit, they compete for available nutrients, light, water and space (Trammell and Butler 1995, Svedvarsk and Van Amburg 1996, Scheiman et al. 2003). Such effects are not restricted to the plant community, but instead have bottom-up effects on the food web which influences all organisms in the affected habitat. Weeds, for example, alter trophic relationships, outcompeting or dominating forage species needed for the survival of native ungulates (Trammell and Butler 1995), or altering community composition critical for survival of grassland bird species (Scheiman et al. 2003). These are but a few examples of the serious effects of weeds on communities; many more are to be found in the scientific literature. It follows that weed infestations that would result from the proposed realignments, and especially if E2 is constructed (see your	

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			commissioned report by Lass and Prather 2007), could be expected to have very serious and long-lasting ecological consequences for the ecology within the project area. – The last sentence in this same paragraph, "*All remnants identified in the project area are bordered completely or partially by weedy vegetation*" further deflects from the needed discussion by implying that weed colonization is not an issue, presumably because remnants are already bordered by weeds or are weedy. Clearly, weed infestation is an issue in the project area (Lass and Prather 2007), not unlike the situation for native grassland habitats everywhere (see any of the preceding literature references). Nevertheless, "the game" is not up with remnant prairie in the project area just because weeds have gained a foot-hold here. – Much of this prairie remains in fair to excellent condition as measured by "cover and extent of non-native species" within the remnants (Lichthardt 2005, p. 4). Lichthardt (2005, p. 6), for example, classified 14 of the 32 remnants as grassland communities, and of these, ranked seven with a top condition score of 'A,' five with 'B,' and two with 'C.' In order to be scored an 'A,' observed weed patches needed to be minor (in extent and abundance) with 80-90% of the grassland community relatively weed-free and biologically intact. A score of 'B' indicated weeds had "made inroads" throughout the remnant, and remnants scored with a 'C' had	

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			extensive annual weed coverage. Lichthardt also mapped weed infestations in the other remnant habitat types in the project area, and found that composition of weed infestation varied by remnant (Lichthardt 2005, Maps 7 & 8). A list of these remnants, along with detailed information on plant species, plant communities and dominant exotic species found therein, is provided in Appendix 3 (Lichthardt 2005). We ask you to re-examine your commissioned Vegetation reports, and you will see that great habitat is found in the project area and much of it remains in good condition. – It is clear that road construction and operation in close proximity to or on the ridge, such as that posed by E2, would expose remnant habitats including the relatively weed-free 'A' condition grasslands to resident and new weed species. Local landowners, the Palouse Prairie Foundation and other local, state and federal organizations are working to keep weeds out of these remnants and E2 would exacerbate this problem. Lichthardt (2005) warns of this threat, stating that noxious weeds known to occur in and around the Moscow area – including yellow-star thistle, spotted knapweed, teasel, and Dalmatian toadflax – could invade Palouse remnants in the project area. Lass and Prather (2007) also provide ample evidence for this scenario, showing a high number of weed species that could invade the area. We urge you to reexamine the evidence provided by your commissioned biologists regarding these	

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			dangers, and especially the dangers that the high elevation E2 alignment would face if constructed. – IN CLOSING – The U.S. Department of Transportation Act of 1966 states, "It is the policy of the U.S. Government that special effort should be made to preserve the natural beauty of the countryside..." ... "The Secretary may approve a transportation program or project... only if: There is no prudent and feasible alternative to using that land..." (DEIS 5.1 Regulatory Framework and Policies, Section 4(f)). We direct your attention to the numerous letters from resources agencies (including the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service and the Idaho Department of Fish and Game) that also are asking the ITD to choose a different alternative than E2 because of how hard this route would be on the Paradise Ridge ecosystem. The DEIS provides prudent and feasible alternatives to E2. ITD should proceed with one of them and stop pursuing alternative E2. – We have shown throughout this letter that alignment E2 is environmentally and ecologically the worst alternative and we call upon ITD to recognize this and remove alternative E2 from consideration as the "preferred alternative." Doing so will help to preserve Paradise Ridge and the prairie for the enjoyment of residents, travelers on Highway 95, and the rare plants and animals that	

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			reside there. Very sincerely, – Board of Directors, Palouse Prairie Foundation David E. Hall, M.S., President Joan A. Folwell, Vice President David M. Skinner, Secretary Jo A. Bohna, Treasurer Timothy D. Hatten, Ph.D., Director at large – References Baer SG, Blair JM, Collins SL, Knapp AK. 2004. Plant community responses to resource availability and heterogeneity during restoration. *Oecologia* 134:617-629. Bakker KK, Higgins KF. 2009. Planted grasslands and native sod prairie: Equivalent habitat for grassland birds? *Western North American Naturalist* 69(2):235-242. Black AE, Strand E, Morgan P, Scott JM, Wright RG, Watson C. 1998. Land-use history at multiple scales: Implications for conservation planning. *Landscape and Urban Planning* 43:49-63. Cameron SA, Lozier JD, Strange JP, Kock JB, Cordes N, Solter LF, Griswold TL. 2011. Patterns of widespread decline in North American bumble bees. *Proceedings of the National Academy of Sciences* 108:662-667. Clarke WM, Bragg TB. 1994. Movement of tallgrass prairie plant species from sod transplant into adjacent reestablished grassland. *Prairie Naturalist*	

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			1200 Sixth Avenue Seattle, WA 98101 Elaine Somers, NEPA/309 Environmental Review, somers.elaine@epa.gov Linda Storm, Ecologist, Wetlands Program, storm.linda@epa.gov – U.S. Environmental Protection Agency, Region 10 – Idaho Office 950 W. Bannock St., Suite 900 Boise, ID 83702 Carla Fromm, Project Officer, fromm.carla@epa.gov – U.S. Environmental Protection Agency Office of Federal Activities, EIS Filing Ariel Building; South Oval Lobby, Mail Code 2252-A 1200 Pennsylvania Avenue, NW Washington, DC 20460 Susan Bromm, Director, OFA, bromm.susan@epa.gov Cliff Rader, Director, NEPA Compliance Division, rader.cliff@epa.gov – U.S. Fish and Wildlife Service Snake River Fish and Wildlife Office/Idaho Fish and Wildlife Office 1387 S. Vinnell Way, Room 368 Boise, ID 83709 Clay Fletcher, Biologist, clay_fletcher@fws.gov Juliet Barenti, Wildlife Biologist, FWS-Northern Idaho Field Office, juliet_barenti@fws.gov Mark Robertson, Branch Chief, Consultation	

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			Conservation Planning Assistance, Mark_Robertson@fws.gov – U.S. Department of the Interior Office of Environmental Policy & Compliance Portland Region 620 SW Main Street Suite 201 Portland, OR 97205-3026 Allison O'Brien, Regional Environmental Officer, Allison_O'Brien@ios.doi.gov Mandy Lawrence, Regional Environmental Protection Assistant, Mandy_Lawrence@ios.doi.gov – U.S. Department of Transportation 1200 New Jersey Ave, SE Washington, DC 20590 Office of the Secretary Ray LaHood, Secretary of Transportation, ray.lahood@dot.gov Joanna Turner, Deputy Assistant Secretary for Governmental Affairs, W85-340, joanna.turner@dot.gov – Idaho Transportation Department Headquarters 3311 W. State St. Boise, ID 83703 Shawn Smith, Senior Environmental Planner, ITD- Lewiston, Shawn.Smith@itd.idaho.gov Vicky Victoria Jewell Guerra, Senior Environmental Planner, ITD-Boise, Victoria.JewellGuerra@itd.idaho.gov Sue Sullivan, Environmental Section Manager, ITD-	

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			Boise, Sue.Sullivan@itd.idaho.gov Ken Helm, Senior Planner, ITD-Lewiston, Ken.Helm@itd.idaho.gov – Idaho Department of Fish and Game Clearwater Region 3316 16th Street Lewiston, ID 83501 Ray Hennekey, Environmental Staff Biologist, IDFG-Lewiston, ray.hennekey@idfg.idaho.gov Dave Cadwallader, Clearwater Regional Supervisor, IDFG-Lewiston, dave.cadwallader@idfg.idaho.gov – Idaho Department of Environmental Quality Lewiston Regional Office 1118 “F” Street Lewiston ID 83501 Clayton Steele, Regional Administrator, DEQ-Lewiston, clayton.steele@deq.idaho.gov – Office of the Governor State Capitol P.O. Box 83720 Boise, ID 83720 Governor Clement Leroy "Butch" Otter, governor@gov.state.id.us – Shirley Ringo, Idaho State Representative, District 5 sringo@house.idaho.gov – Dan Schmidt, Idaho State Senator dschmidt@senate.idaho.gov	

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			– Latah County Commissioners P.O. Box 8068 Moscow, ID 83843 Board of County Commissioners, bocc@latah.id.us Dave McGraw, District III, dmcgraw@ Tom Stroschein, District II, tstroschein@ Richard Walser, District I, rwalser@ Kara Egan, Deputy Clerk of the Board/Administrative Assistant: kegan@ – City of Moscow, Mayor and City Councilors P.O. Box 9203 Moscow, ID 83843 Mayor Nancy Chaney, nchaney@ci.moscow.id.us Moscow City Council, council@ci.moscow.id.us Tim Brown, tbrown@ Dan Carscallen, dcarscallen@ Wayne Krauss, wkrauss@ Tom Lamar, tlamar@ Sue Scott, sscott@ Walter Steed, wmsteed@	
L-36	Shirley Idaho House of Representatives (District 5)	Ringo	House of Representatives State of Idaho – March 7, 2013 – Ken Helm District Two Idaho Transportation Department Box 837 Lewiston, Idaho 83501	FHWA and ITD are committed to complying with NEPA and successfully completing the project. FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response NEPA and Schedule regarding the environmental process and the anticipated schedule. See General Response Displacement-1 and

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			– Dear Mr. Helm: It is clear that completion of the segment of highway from Thorn Creek to Moscow is critically important. With that in mind, we must be assured of the integrity of the process and information so that there are not potential credible challenges that would lead to further delay. I have been contacted by constituents who have concerns about the Publication, "Guide to the Draft Environmental Impact Statement," and other information in the DEIS. They have asked me for more specific details regarding some of the areas discussed, and I would appreciate having you supply the information. Reason C-3 was not identified: 1. It would displace eight businesses – what businesses would be displaced? What businesses would be adversely affected, and how? 2. It would have the greatest affect on residences - what residences would be affected by C-3 and E-2? Would E-2 displace all residents of the mobile home park near Eid Road? 3. It would have the highest crash rate of any of the alternatives - how significant is the statistical difference, and are potential accidents related to wildlife given consideration? Do you have information that Idaho Fish and Game predicts that the road through deer, elk, and moose habitat will likely cause "a number of big game/vehicle collisions in the future?" E-2 is the safest alternative - did your studies of	Displacement-2 regarding differences between what was stated in the DEIS sections and the DEIS hearing by ITD staff regarding residential and business impacts. Additional detail regarding impacts and potential impacts to residences and businesses has been prepared, however; due to the conceptual level of detail that is currently available the exact displacements are unknown. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3. See General Response Safety-6 regarding the significance of the differences between alternatives. The DEIS does state that there would be shorter commute times but does not claim this to be a significant difference. See Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Response Weather2 regarding the five-month data set and how it relates to the larger 30+-year data set. While growth in the southern end of Moscow is predicted with any of the alternatives, the potential safety impacts would be mitigated because each alternative would have Expressway Access Control, which would limit growth. See General Response Agency regarding the difference in agencies' opinions regarding FHWA's and ITD's Preferred Alternative.

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			weather conditions comprise a wide sample of conditions during various times of the year? 4. E-2 would have the shortest travel time - can you discuss the significance of the difference? 5. The report mentions that E-2 affects wildlife habitat, and affects more farmland and wetlands. It seems significant that C-3 would require the least amount of right-of¬ way. How much did these factors weigh in your decision? 6. Your report indicates that 8 businesses would be displaced by C-3. What are those businesses and how are they affected? I note the following statement in the DEIS: "C-3 is believed by business owners to have the least indirect effects because the access would be similar, although it would be changed to a limited access facility. Traffic would continue to pass by the existing business which would encourage businesses to stay or locate in the area. W-4 and E-2 would have greater effects to visibility and access to existing businesses; however they could also potentially encourage growth in the area. While safety and direct routes to and from Moscow and Lewiston are also believed to be an important consideration for area businesses and goods movement, the travel times and safety between Action Alternatives does not differ substantially." There were other concerns, but I would appreciate your response to those I have detailed. I find them bothersome, along with information I have that IDFG, EPA, and USFWS prefer the C-3 alternative to the E-2 alternative.	

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			We have waited a long time for improvements on this stretch of highway. The changes proposed have far-reaching and long-lasting implications. On behalf of my constituents, I eagerly await clarification on these concerns. Best regards, Representative Shirley Ringo	
L-37	David M.	Skinner	Comments regarding the Draft Environmental Impact Statement US-95 Thorn Creek to Moscow – Submitted by David M. Skinner. March 19, 2013 – Idaho Transportation Department: I have worked with Palouse Prairie professionally since 1996. During that time I have learned much about the ecosystem. From that experience, and from the scientific background that i have from both education and long-time experience in the sciences, I have the following concerns about the Draft EIS for US 95 and in particular proposed route E2. E2 is environmentally untenable. There are other alternatives available which are just as feasible and which are superior in many other aspects. Alternative E2 has so many obvious faults and flaws it is difficult to imagine what ITD engineers were even thinking about when they decided E2 was their "*preferred alternative*". Many of the reasons for this untenability below come either from personal experience or from the body of scientific literature related to grassland	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. As stated in the FEIS Section 4.8, the E-2 Alternative would avoid directly affecting rare plant populations that the E-2 Alternative and would avoid direct effects to Palouse remnants on Paradise Ridge. However, it would be closer and could result in indirect effects. As stated in the DEIS, there are many other potential sources of weed dispersal including residential, commercial development and CRP land. Additional information regarding the ongoing efforts for weed control and prairie restoration has been added to the FEIS Section 3.8 and 4.8 and Chapters 6 and 9. Additional weeds that could be introduced from outside of Latah County have been added to the FEIS Section 3.8. There are several mitigation measures, including monitoring and a vegetation management plan that are proposed which would minimize the potential for indirect effects including weed dispersal. See General Response Weeds and Wildlife regarding Palouse remnants and Paradise Ridge and Chapter 9 Environmental Commitments.

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			ecology in general and/or Palouse Prairie specifically. I have not provided references here as i doubt ITD staff have or will take the time to read the literature. However, i can supply the references if you so desire. E2 comes very close to Palouse Prairie remnants on Paradise Ridge. This is both a direct and indirect threat to said remnants and I therefore believe it should not be the "*preferred alternative"* just for that reason alone. Palouse Prairie once covered much of eastern Whitman County and western Latah County but today is rare. Because the environmental conditions that formed the Palouse Prairie are the same ones that made it some of the most productive agricultural land in the world, over 99% of the prairie has been converted to agriculture and other uses and Palouse Prairie is one of the rarest ecosystems in the world. The exact amount of remnant Palouse Prairie is not presently known, but it is less than 1% of its original extent. On that basis alone the few small and widely scattered remnants that remain should be protected from further harm. They provide habitat for many species including beneficial soil microbes, pollinators and other beneficial insects, birds and small mammals, and large game animals. Most of the remaining Palouse Prairie is in small, isolated fragments. Fragmentation results in lower animal movement, lower gene flow, less movement	General Response Agency discusses the agencies' differences in opinion regarding FHWA's and ITD's Preferred Alternative. The value of remnants was based upon the extent of non-native invasive species and also considered size. See the Vegetation Technical Report under the description of Methodology. See General Response Weather-2 regarding the 5-month data set and how it relates to the larger 30+-year data set. See General Response Weather-3, Weather-4 and Weather-5, and Weather-6 regarding weather related to elevation, ice, snow, wind, fog, frost and other weather related driving conditions. General Response Weather-1 explains how the C-3 Alternative was represented in the Weather Analysis. See General Response Safety-3 regarding how safety of the existing US-95 was considered in the revised Safety Analysis. See General Response Maintenance-1 regarding maintenance costs. See General Response Safety-5 regarding Reisenauer Hill. See General Response Displacement-1 and Displacement-2 regarding impacts to residences and businesses. The clarification of impacts and potential impacts to residences and businesses has been made in the FEIS. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analysis. See General Response Safety-6 regarding the significance of the difference in lengths and safety

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			of pollinators and other insects, and less movement of water and nutrients. It is important to maintain as much connectivity as possible between the fragmented remnants of Palouse Prairie. Fragmentation can lead to extinction locally or over an entire species range when the fragments are no longer large enough to provide ecological support for that species. Highways fragment landscapes and habitat. While not a totally impervious barrier, roadways certainly restrict or adversely change connectivity and increase the effects of fragmentation resulting in more isolation of species, more inbreeding depression, and greater extinction pressure. E2 would have the most detrimental fragmentation effects of the suggested alignments because it is closest to more and higher quality Palouse Prairie than C3 or W4. The few, scattered remnants remaining today are preserved primarily because they lack value as agricultural land, usually being too steep or rocky. The biggest threat to these remnants is not farming, but destruction and weed invasion caused by construction projects! No Palouse Prairie should be damaged in any way either during the construction or during future use of US 95. No equipment, roads, transmission lines, or any other parts of the highway should be placed where it will cause damage to any Palouse Prairie remnants on Paradise Ridge or anywhere else.	between alternatives. Additional information on giant Palouse earthworm occurrences, bees, Palouse remnants, fragmentation, noise impacts on birds, and other information requested by agencies and the public regarding vegetation, fish and wildlife have been added to the FEIS Sections 3.8, 4.8, and Chapter 6, Indirect and Cumulative Effects. See General Responses for IDFG regarding the pygmy nuthatch. The gray wolf has been delisted by the USFWS in the state of Idaho and therefore is not discussed in Sections 3.9 and 4.9 Threatened and Endangered Species and is not listed in the Biological Assessment. Mitigation measures and standard specifications that are typically applied on ITD projects that could minimize harm to resources are detailed in the FEIS Chapter 9, Environmental Commitments. ITD has committed to a Weed Inventory and Control Plan and a Vegetation Management Plan that will include funding for monitoring, establishing native perennial vegetation and the biological, chemical and/or physical control of weeds. ITD will comply with the Construction General Permit (CGP) which requires that areas disturbed will have 70% vegetation cover (not including invasive species) post construction. ITD will use highly visible fencing during construction to keep contractors out of sensitive areas such as wetlands. ITD will implement BMPs to minimize construction impacts. ITD will investigate engineering solutions during final design to further avoid or minimize impacts to natural resources where feasible. As noted, there have been disagreements between ITD and IDFG, primarily

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			The Washington Department of Fish and Wildlife (WDFW) considers Palouse Prairie to be among the most endangered ecosystems in the US and endorses its preservation. The Environmental Protection Agency (Region 10), The Nature Conservancy, the Palouse Land Trust, and the Palouse Prairie Foundation all support preservation of the small amount of Palouse Prairie that remains. The Idaho Department of Fish and Game (IDFG), the Environmental Protection Agency (EPA), and the US Fish and Wildlife Service (USFWS) prefer avoidance of the E-2 Alternative. They have determined this thru a thorough examination of the science involved. Yet, ITD insists on playing semantic tricks to belittle and dismiss the scientific opinions of other agencies by saying "*this is primarily due to the perceived effects of the E-2 alternative on wildlife habitat*" (emphasis mine) (DEIS pg 16). This demonstrates ITDs lack of willingness to listen to any opinion or fact that deviates from their own predetermined conclusions. The Palouse Prairie Foundation, also after a thorough scientific examination, recommends avoidance of alternative E2 for many of the same reasons as IDFW, EPA and USFWS. E2 would affect more than twice as many prairie remnants in the project area than C3 or W4. There are 24 remnants near E2 vs. 14 for C3 and 12 for W4. (DEIS p. 207, Table 62). E2 passes much closer to some of the remnants than does either W4 or C3.	because the affected habitat is primarily farmland, which serves as marginal habitat for ungulates. The affected land is entirely privately owned parcels with no federally protected species therefore ITD maintained that while measures to minimize harm are proposed by ITD, no additional compensatory mitigation was warranted. Since the publication of the DEIS, ITD has met with IDFG and come to an agreement on mitigation measures for impacted wildlife and habitat which is described in Chapter 9, Environmental Commitments. ITD is committed to continue to collaborate with IDFG and other resource agencies before final design and project implementation to further refine the mitigation measures described in Chapter 9, Environmental Commitments. Mitigation for weed dispersal and establishment will involve minimizing soil disturbance, revegetating bare soils to reduce risk of establishment, and species selection that will consider quick and sustainable groundcover. Additional mitigation measures are described in the FEIS Chapter 9, Environmental Commitments. ITD and IDFG have met about a potential mitigation for effects to fish and wildlife and their habitat and agreed upon the mitigation measures described in Chapter 9, Environmental Commitments. Temporary construction impacts including due to staging, stockpiling, and indirect effects are described in the respective sections of the DEIS and FEIS Chapter 4. It is also discussed in Chapter 6, Indirect and Cumulative Effects. Measures to minimize harm to resources including weed control and impacts to staging and stockpile sites are described in Chapter 9,

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			The remnants on Paradise Ridge are larger and of higher quality than those elsewhere in the project area (DEIS Vegetation Report by Lichthardt 2005). Because of the above, E2 would have a much greater detrimental effect on the endangered Palouse Prairie ecosystem than C3 or W4. Because the largest and highest quality remnants are on Paradise Ridge, E2 would put at risk a higher proportion of globally imperiled plant species such as Palouse milkvetch (*Astragalus arrectus*) broad fruit mariposa (*Calochortus nitidus*), and Palouse goldenweed (*Pyrrocoma liatriformis*). Presence or absence of rare plants should not be the sole determining factor in whether a prairie remnant is valuable. Because of the rarity of the ecosystem, all of the remnants are valuable, whether or not they contain rare plants, and whether or not they contain invasive weeds. Restoration efforts thus far have been able to re-create only rough approximations of the original Palouse Prairie. To do more will take a tremendous amount of time, energy, dedication, and resources. Some of the parts (especially soil organisms) may be missing and we may never know what they were. This makes the existing remnants very valuable, as it is far easier and less expensive to preserve them than to restore them. Damaged prairie cannot simply be repaired by seeding “native grasses”. The vegetation mitigation suggested in the DEIS is totally inadequate and inappropriate. The only way	Environmental Commitments. The Weather Analysis states that the climate is already established for the area based on historical data from published literature and data from the PSF. Additional data from the weather stations was collected and incorporated into the Revised Weather Analysis (Qualls 2014). General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95. Access for emergency response vehicles would be safer because it would use portions of the new US-95 and the traffic volumes on the existing US-95 loop would be much lower. ITD and FHWA are not required to select the alternative with the least amount of right-of-way. See the FEIS 3.2 and 4.2 regarding the alternatives’ consistency with the Comprehensive Plans and the Ring Road project. While all the action alternatives would have greatly improved safety, the straighter alternatives would have better sight distance which would reduce animal collisions and increase overall safety.

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			to protect the ecosystem is to avoid it during siting, construction, and operation of the highway. Avoidance of impact is the only realistic mitigation available for Palouse Prairie. The first and preferred mitigation is avoidance of disturbance of any Palouse Prairie. ITD does not have the expertise, the funds, or the desire to do compensatory mitigation for any Palouse Prairie impacted by highway construction. ITD has consistently rejected, rebuffed, and/or stonewalled any suggestions from IDFG regarding mitigation for any of the environmental impacts of highway construction. ITD has shown a reluctance to work with anyone or any group who might have an opinion differing from ITD. In a letter to ITD, IDFG recommended avoidance of the eastern alignment. (E2) "*It has been IDFG's position from the start – a position supported by recommendations from the other resource agencies – that the eastern alternative will have the greatest direct and indirect impacts to wildlife and other resources.*" Again, avoidance of impact is the primary mitigation tool available. In a letter to the Federal Highway Administration on March 8, 2004, the EPA notes that avoidance and minimization are the first and second priorities in mitigating impacts. Compensatory mitigation is only appropriate when impacts cannot be avoided or minimized. "*We anticipate that avoidance of sensitive, rare, and/or high value terrestrial and aquatic habitats will be the most significant environmental need for this proposed project*."	

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			(letter in the appendices of the DEIS). Avoidance and minimization are only achieved by not building alternative E2! Furthermore, in the DEIS under "Topics of Concern and Controversy" it states, "*there has been disagreement between IDFG and ITD regarding appropriate mitigation*." One recent mitigation proposal by IDFG suggests ITD could set aside compensatory mitigation funds of $750,000 for E2 and $325,000 for C3. Even this grossly underestimates the cost of restoration for damaged Palouse Prairie. The differing numbers suggested by IDFG, however, demonstrate how much more valuable the habitat is in the vicinity of E2. Of course, ITD has resisted any suggestions regarding mitigation. There is little mention of vegetative mitigation in the DEIS except that mentioned by other agencies and groups and an ambiguous statement regarding weed control on pg 231. ITD has failed to consider mitigation and has developed no plans for doing any mitigation despite having it brought to their attention. One must conclude either that ITD has no intention to mitigate for environmental damage or that they desire to keep any mitigation plans out of the public view until all possibility of public comment has expired. There is no mention of species to be used. There are no details as to seeding rates, timing, establishment, follow-up for unsuccessful seedings, soil preparation, or tactics for maintaining the stand once it is established.	

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			Native species often do poorly in competition with weedy species on the exposed subsoils of road cuts and fills. The species which do best on roadcuts and fills are often non-native and invasive. There is no mention in the DEIS of any actual weed control away from the right-of-way (ROW), only that ITD will seed the ROW to some unnamed species which will magically prevent weeds from spreading out of the ROW. They only suggest they will consult with "local weed experts". There is no mention of who they might be or if anyone else with valuable input will be consulted. Pesticide applicators should be trained to recognize the species they might encounter. At present the knowledge level of ITD applicators in this regard is woefully inadequate. Vegetation mitigation should be subject to public review and should be planned and detailed out in the FEIS. There is no discussion of impacts outside the ROW from such activities as equipment parking, equipment maintenance, and materials stockpiles despite the fact that these activities can have serious impacts on nearby habitat. These can be major sources of new weeds. Because these activities can be the result of agreements between contractors and local landowners, they can also have major impacts which may be outside the direct control of ITD, including the destruction of important habitat and	

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			contamination of valuable farmland. There is no mention of how ITD plans to control unauthorized access to lands outside the ROW by contractors and employees within and outside of their actual performance of duties. Such activity resulted in the destruction of rare plants on the earlier construction project on US95 from the top of the Lewiston Grade to Thorn Creek. The weather data relied upon in the DEIS is seriously flawed. On page 1 of the Weather Technical Report it states "*ITD desires to characterize the climate of the study area with respect to variables which affect driving conditions and traffic safety*." Climate is determined by extensive weather measurements over an extended time of many years. The study lasted for only five months, not even remotely sufficient to determine any climatic trends. ITD relies solely on a weather study conducted from January 2005 thru May 2005. This study failed to capture data for half of a winter and then only captured data for half of a very unusual Palouse winter which was noted for its lack of snow. • The weather study was conducted during one of the mildest, driest year on record for more than 30 years. It is inadequate at best! This means the supposed superior safety of alternative E2 is, in fact, incorrectly calculated and does not account for normal snow, ice and fog which can be expected in most winters, especially given the increased elevation of alternative E2. The Weather Technical Report did not even	

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			evaluate snow levels because there was no snow to evaluate during the time period of the study! Again, how could ITD claim to have considered weather conditions in deciding which was the safest alternative? ITD itself reports that nearly 60% of accidents on US 95 are weather related, yet they recommend alternative E2 based on faulty information. On pg 5 of the Weather Technical Report it states "*measurements are ongoing*". However, this report only includes data from January 1, 2005 through May 1, 2005. If the data collection is indeed ongoing, why is it not reported in the DEIS published in 2013, nearly 8 years later? I must conclude that either the statement in the DEIS is incorrect and no further follow-up weather data was collected, or ITD decided to ignore any further data collected. Either indicates unwillingness on the part of ITD to really consider all the facts before making a decision. The weather data for this short period of time was collected from only 3 stations (DEIS pg 2) within the study area. Anyone remotely familiar with the Palouse knows that the topography creates multiple microclimates which 3 widely scattered instrument sites would never possibly hope to cover. The 3 stations were not even correlated to specific routes and none of the data reflects conditions on the C3 alternative because no instruments were placed anywhere near that route except the top of Reisenauer Hill, a site which is common to all three alternatives.	

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			If ITD is really interested in safety, as they claim, it seems they should have taken steps a long time ago to ensure that accurate data was collected. Over the 8 years between the time ITD commissioned the study and the time they released the DEIS, they could have gathered plenty of valuable data. They did not! This reflects ITD's intention to build E2 without considering contrary information. They are obviously not interested in facts! E2 covers the distance from Thorn Creek to Moscow at the highest elevation of the 3 possible alignment choices. Much of it is above 2800 ft., reaching above 3,000 ft in places. Those of us who have lived in this area for any length of time know that elevation equals more snow, ice, freezing temperatures and fog. Higher elevations are also subject to higher winds and more snow drifting. Many of us need only look out our windows to see this on Paradise Ridge! Those of us who drive US95 know that the worst road conditions are frequently encountered on the tops of Reisenauer Hill, Steakhouse Hill, and several other hills to the north. The weather analysis did not note any of this because it was not properly conducted over time and did not have enough properly located instrument sites! During the winter, school bus drivers and residents of the area report frequent fog on the higher parts of Eid Road than on lower elevations where the current US95 runs. The weather analysis did not note this because it was not properly conducted over time and was not conducted during a typical	

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			winter. Additionally, the instruments were not properly located to capture this data. E2 will be more expensive to maintain. Not only will snow and ice at higher elevations make the road less safe to travel, it will also increase the costs of maintenance to deal with the snow and ice removal and/or abatement. Weed invasions are known to occur primarily along roads. The impacts from weeds would be much greater along alternative E2 than along any of the other alternatives. "*New roadway alignments, induced development and weed distribution through vehicles can contribute to the establishment and spread of weeds and could contribute to the degradation of nearby Palouse remnants. Remnants within 0.6 miles of the highway are at greatest risk to weed invasion*" (emphasis mine) (Lass and Prather Technical Report 2007). The potential weed infestation zone for E2 extends to the top of Paradise Ridge! It is true that there are already weeds on Paradise Ridge. This, however, is not the point. Many of the landowners on Paradise Ridge are already working hard to control weeds in remnant native vegetation and in farmland. Considerable amounts of money and time have already been invested by landowners as well as state and federal agencies in the control of weeds which threaten Palouse Prairie remnants. E2 would destroy many of the gains already made and contribute to more weed invasion. ITD seems to think the mere existence of other	

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			threats to the integrity of Palouse Prairie remnants justifies introducing a new threat in the form of a new roadway (E2). This argument shows either a blatant disregard for or a complete lack of understanding of ecological principles. Existence of other threats does not justify adding new threats! Rather, it mandates avoiding the introduction of more threats! This means avoiding the E2 route altogether. Putting a major highway up on Paradise Ridge opens the area to invasion by new weeds. These are weeds that are not yet established in Latah County or are present in only isolated populations elsewhere in the county. For a list of these weeds, view the Idaho State Department of Agriculture Noxious Weed List at http://www.agri.state.id.us/Categories/PlantsInsects/NoxiousWeeds/watchlist.php The weeds in the "Statewide EDRR List" and the "Statewide Control List" are among the ones which threaten Palouse Prairie remnants. US95 runs from the Canadian Border to the Mexican Border thru 5 states. Vehicles can and do easily carry weed seeds and propagules long distances, opening new areas to weed invasion from distance sources. Construction equipment is also a significant vector for moving weed propagules from one site to another. The DEIS makes no mention of any ITD requirement for cleaning and inspecting equipment for weed propagules before transporting. One can probably deduce that ITD has no such program.	

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			According to the DEIS Vegetation Technical Report of Lass and Prather (2007), counties adjacent to Latah County have 32 invasive weeds that are not found in Latah County. E2 would offer an easy corridor to new invasions of the Paradise Ridge ecosystem by many of these weeds. Additionally, E2 would offer an easy colonization corridor for other invasive weeds not yet found of Paradise Ridge but present in other parts of Latah County. Alternative E2 requires a comprehensive and ongoing program by ITD to monitor and control invasive weeds, yet no mention of such program appears in the DEIS. ITD does not have the expertise, the funds, the equipment, or the desire to mitigate for weed impacts 0.6 miles from the roadway. ITD cannot and will not provide sufficient weed control monitoring and prevention. Because of this, alternative E2 should be avoided! The cost of weed control away from the E2 right-of-way will fall to Latah County and the landowners affected. Active farmland is a very effective barrier to weed encroachment because weeds need time to establishment and farmers are very diligent about weed control in their cropland. Thus C3 or W4 would be much better at preventing weed spread into adjoining lands than E2. Parts of E2 would pass thru land in the Conservation Reserve Program (CRP) and near remnant native vegetation which are not as actively managed for weeds. Weeds could quickly and easily spread from the roadside	

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			into adjacent lands in this situation. In fact, on pg 206 of the DEIS, it is stated "*intensively managed cropland is believed to provide a more efficient buffer to new weed invasion compared to native vegetation or CRP plantings."* If E2 is built, there is no access for people living along present US 95. They will still travel the existing US 95 with all its hazards. School buses would still travel the old section of US95, including Reisenauer Hill, to pick up and return children of families living along the old route. Existing US95 would be turned over to Latah County and the county would have to maintain the roadway for access to the homes in that area if E2 is built. According to the DEIS (pg 4) the existing section of US95 has a substandard rating for the pavement surface. Both the surface roughness and the amount of cracking fall below the minimum standard indices used to determine acceptable pavement performance. The county will be responsible for maintaining and repairing a substandard road if E2 is built. While Latah County employees are very capable and work hard at their jobs, the fact is that Latah County has many more miles of roads to maintain with fewer people and lower budgets than ITD. This means county roads do not get plowed out or maintained as well as state highways, making them more dangerous to travel, especially in bad weather. One of the most dangerous sections, Reisenauer	

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			Hill, would still exist as it is today if E2 is built. Local traffic would still need to use Reisenauer Hill. This hill would be even more dangerous because it would not be maintained as well in inclement weather as it was when it was part of US95. Instead, if the C3 alignment is built, the highway over Reisenauer Hill will be built to current AASHTO standards and will be much safer than the existing roadway. If E2 is built, there would still be accidents on the existing stretch of US95. Looking at the overall picture, the accidents on existing US95 should be attributed to building E2. If we imagine for a second that ITD correctly calculated accident rates, when this is factored in, it is likely the predicted accident rates would be very similar. However, in view of the fact that ITD did not have enough weather data to correctly predict accident rates, it is quite likely that the total accident rate for E2 would be higher than for C3. Emergency equipment would also need to travel this section of US95 to respond to emergencies on the property of local residents. In a letter to the editor of the Moscow-Pullman Daily News, the Moscow Rural Fire District Board of Commissioners supported E2 because they thought it would improve safety and response time. They are mistaken. C3 would improve safety and response time to local residents. E2 would have no access to local residents along existing portions to US95. At best that would leave response times where they are now. During severe weather events,	

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			response times would likely be even longer. – There appears to be a widespread misconception that houses on Paradise Ridge cause environmental degradation. While home sites can cause degradation if not properly managed, home sites also can result in great improvements to habitat. Paradise Ridge is all privately owned. The good remnants can span multiple landowners. A number of landowners are aware of the uniqueness of the Palouse Prairie on their land and are actively working on protecting and restoring parts of it. Since the home sites are frequently multiple acre parcels, this is often a good way to preserve and even expand habitat. Indeed, having a home site owner with an interest in creating and/or preserving habitat may be preferable from an environmental aspect to the land remaining in the hands of a farmer where it might again be either pastured or plowed out to grow crops. I have occasionally consulted with new home site owners in local rural areas (although not yet on Paradise Ridge). They are usually interested in locating the home on the worst habitat so that they can preserve the best. There is conflicting information about displacements. The DEIS claims C3 would displace 7 residences, E2 would displace 5, and W4 would displace 3 (DEIS pg	

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			13). The DEIS claims 8 businesses would be displaced by C3, none by E2 or W4 (DEIS pg 13). The "Screening of Alternatives" Technical Report claims C3 and W4 would each displace 3 residences, E2 would displace 5 (pg 17 of Tech Report). No business displacements are mentioned in this report. According to a recent Letter to the Editor in the Moscow Pullman Daily News, a local resident was informed by 2 employees of ITD that no businesses would be displaced by C3. Also, according to the same letter, during a follow-up conversation the same resident was informed by one of the same ITD staff members that E2 would displace the most homes and C3 would displace only 1 home. If the DEIS is correct, ITD has done a very poor job of informing their own employees of their plans. If ITD has such poor communications with their own staff, can the public expect ITD to give them factual information? Not even the DEIS agrees with itself! If the ITD staff members are correct and the DEIS is incorrect, why was the DEIS not updated to reflect the correct information. Again, how can the public expect ITD to give them factual information? Either way, it appears ITD is not really interested in the truth, but only in obfuscation to deceive the public and that they plan to build E2 without regard for conflicting evidence. With careful planning and design, ITD should be able to avoid any displacements by shifting the	

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			roadway. Engineers often take pride in saying "nothing is impossible". Impacts on wildlife. Idaho Dept. of Fish and Game, US Fish and Wildlife Service and Region 10 of the Environmental Protection Agency all recommend avoidance of E2 because of its potential impacts on wildlife and habitat. E2 is closer to moderate ungulate habitat and would increase the likelihood of vehicle-ungulate collisions. This creates a wildlife impact issue and a human safety issue as well as causing increased property damage. C3 would have the least affect on wildlife in general. E2 would pass through higher quality habitat for ungulates including elk, moose and deer (DEIS pg 171). E2 would increase noise and human presence in habitat used by ungulates (DEIS pg171). E2 would generate greater traffic noise than C3 or W4 (DEIS pg 182, Table 56) and this would negatively affect usage of the area by animals and birds. E2 would reduce connectivity between remnants for prairie fauna, including pollinators. Connectivity is also important for gene flow in plants to reduce inbreeding depression. E2 would affect more wildlife species dependent on the prairie or intergraded habitats of Paradise Ridge (DEIS pg 163, Table 47). E2 would affect critical habitat for the giant Palouse earthworm (*Driloleirus americanus*). The DEIS	

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			incorrectly characterizes the Paradise Ridge area as unsuitable habitat for D. americanus. In fact, most of the recent discoveries of D. americanus have been from Paradise Ridge. Even if the highway avoids direct impact to D. americanus habitat, indirect impacts from increased weed invasion are still a threat to D. americanus. E2 has the greatest potential to impact habitat and therefore the giant Palouse earthworm. The Biological Assessment concludes "*the project will have no effect on the gray wolf*." However, wolves have been reported on Paradise Ridge by at least 2 reliable sources. This suggests the Biological Assessment, dated 2007, needs to be updated. E2 impacts 4 acres of pine stands. These pine stands are habitat for northern alligator lizard, pygmy nuthatch and long eared myotis. C3 and W4 impact no pine stands and no habitat of northern alligator lizard, pygmy nuthatch and long eared myotis. Many of the pine stands of Latah County have already been lost. Page 169 of the DEIS calls this pine stand "potential habitat" for pygmy nuthatch, yet the wildlife technical report states that pygmy nuthatch are already known to inhabit the stand. It appears ITD is willing to distort facts in order to support their predetermined "*preferred alternative*" . Pygmy nuthatch is rare in northern Idaho and populations here are considered imperiled. Any loss of habitat has a cumulative effect on already imperiled populations (DEIS Melquist Technical Report, pg 13. E2 destroys habitat for the birds. C3	

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			and W4 do not. Melquist (DEIS Technical Report, pg 15) recommends avoidance of E2 for this very reason! ITD on pg 169 of the DEIS calls such loss of habitat for pygmy nuthatch "*minor*", ignoring the technical data and without any supporting evidence for their contrary opinion. Again it appears ITD is willing to distort facts in order to support their predetermined "*preferred alternative*"! Pygmy nuthatches prefer south slopes of mountains. E2 would impact the populations on Paradise Ridge and they cannot simply move to other parts of Paradise Ridge, as suggested in the DEIS (pg 169) because the other parts are not suitable habitat. C3 and W4 do not impact pygmy nuthatch. Even if the pygmy nuthatch habitat is not directly affected, indirect effects from increased traffic noise will have a large impact on the nesting sites. Putting up a few "nest boxes" (DEIS pg 231) will not mitigate for the impact of E2. The birds will not use the otherwise suitable habitat because of the increased noise. E2 would affect more CRP land than other alternatives (DEIS pg 143). CRP is important habitat for grassland nesting birds. Grassland nesting bird populations are under serious decline nationwide. The loss of CRP grasslands is nearly 5 times more for E2 compared to C3 or W4 (DEIS pg 145). Bat populations are declining globally, nationally, and locally. Habitat loss and habitat degradation are considered important factors in this decline. E2	

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			destroys or degrades habitat for bats. C3 and W4 do not. E2 will result in increased noise levels near suitable habitat for long eared myotis Increased noise will likely cause the bats as well as pygmy nuthatches to avoid otherwise suitable habitat. These additional considerations all suggest that E2 should NOT be the "*preferred alternative*". C3 would have the most access points and this would be most convenient for local residents and provide best emergency response times to local residents. Access points will have turn lanes and merge lanes so that turning traffic does not need to slow down or stop on the roadway and vehicles entering the highway can get up to speed before merging. E2 has much higher noise impacts for those people living in the area. E2 requires more new right-of way acres than C3 and only 3 less acres than W4 (DEIS pg 53, table 8). E2 goes against much of the Natural Resource Element in Latah County's Comprehensive Plan. E2 opens Paradise Ridge to new and greater fire hazards. The window for fire in agricultural land is rather short. CRP grasslands, prairie grasslands, and forests have a much wider window. Activities along roadways are a common ignition source for wildfires. C3 and E2 have about equal construction costs. C3 and E2 have a similar number of residential displacements, if the DEIS numbers are assumed to be accurate. We have seen from above that they	

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			may very well not be! C3 is more compatible with a proposed Moscow ring road than E2 or W4. C3 is the most consistent with Moscow and Latah County land use goals C3 is only 0.09 miles longer than E2. That is less than 500 feet! C3 requires the least amount of new right-of-way. The policy of the Federal Highway Administration is to take the least new right-of-way. E2 does not meet this requirement. C3 has less noise impacts to area residents. C3 would have the least adverse visual impact. C3 would take the least amount of prime farmland, farmland of statewide importance, and CRP land. Alternative E2 would take twice as much prime farmland and nearly 5 times as much CRP lands as C3. C3 would be a new highway engineered to today's American Association of State Highway and Transportation Officials (AASHTO) standards. Curves would be designed for high speed travel. Straighter does not equal safer with these design standards! The divided portion of US95 from the top of the Lewiston Grade to Thorn Creek is not straight, yet it is constructed to AASHTO standards and the curves are safe by those criteria. C3 has the least new area (acres) of impervious surface. This is significant in terms of the amount of pollutant runoff into area streams. If either W4 or E2 is built, the existing US95 would still be providing access to local residents and the impervious surface	

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			there combined with that from the new alignment would add to the runoff. C3 is viewed by the City of Moscow as the most consistent with city and area land use goals. C3 is more compatible with a proposed Moscow ring road than is E2. E2 will affect over twice as many acres of wetlands as C3 but not as much as W4 (DEIS pg 146, Table 45). Wetlands are important wildlife habitat and also important in flood control. The National Environmental Policy Act (NEPA) of 1970 requires ITD to mitigate for any wetlands impacted. The best mitigation policy is to avoid wetlands. C3 avoids the most wetlands. During the construction of the divided portion of US95 from the top of the Lewiston Grade to Thorn Creek, a contractor for ITD buried and destroyed a Spalding's catchfly (*Silene spaldingii*) population that had been reported to ITD. Spalding's catchfly was and is currently listed as threatened by the US Fish and Wildlife Service. ITD did not take adequate steps to prevent this from happening. Why could they be trusted to build a highway in an even more environmentally sensitive area? Latah County Commissioners wrote a letter in support of E2. Unfortunately, they did no research of their own. They relied on hearsay and misinformation and refused to listen to any contrary evidence. They obviously did not even bother to read the DEIS. It appeared they had already made up their minds before bringing the issue up in a public meeting.	

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			The EPA policy is to make the least impact on the environment. ITD is required to choose the alignment that will best meet this criterion. E2 does not meet this requirement. In Section 2.6, page 55 of the DEIS ITD states "*The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge . . . .*" This is another example of ITD using confusing language to obscure the impacts of what they want to do! E2 is not "*closer to the base*". It is, in fact, on Paradise Ridge above the base! E2 will be on Paradise Ridge! In 2002, ITD proposed to build a new highway over Paradise Ridge. They did so without any public involvement and were disdainful when met with resistance from the public. In 2003 they were taken to court over the issue and the court decided that ITD had not followed the law or sufficiently considered environmental impacts. ITD was ordered by the court to conduct environmental studies and prepare an Environmental Impact Statement. Ordinarily, an EIS is produced in a year or two. ITD chose to delay the process for over nine years, finally publishing a draft EIS in late 2012. One would suppose that this extraordinary time frame would result in an excellent evaluation of the environmental impacts, but this sadly was not the case. The DEIS is full of holes, poor data, and even incorrect conclusions drawn from that data. With this much sloppy work, it is unlikely the FEIS will be any better. It makes one wonder whether ITD	

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			engineers had their egos bruised by the public reaction and court decision and decided to half-heartedly jump thru some hoops and still trot out the same old bad idea. As is seen from the evidence above, alternative E2 is really the worst alternative, not the best. I call upon ITD to do the right thing, admit they were wrong about building a highway on Paradise Ridge, and get on with the business of serving the public by building a highway which is both environmentally less damaging and safer to travel along the C3 alignment. David M. Skinner 1020 East F Street, Moscow, ID 83843	
L-38	Wayne and Jacie	Jensen	March 22, 2012 Wayne and Jade Jensen Comments Wayne and Jacie Jensen 1461 Thorn Creek Rd., Genesee, ID 83832 Idaho Transportation Department Headquarters Office of Communications P.O. Box 7129 Boise, ID 83707-1129 Fax (208}334-8563 comments@itd.idaho.gov – – Dear Idaho Transportation Department, Thank you for putting in place procedures and policies on State projects, including the opportunity to make comments. The purpose of the Thorn Creek Rd to Moscow proposed realignment of Hwy 95 is to improve public safety and increase highway	ITD appreciates your family's efforts to maintain and preserve the health of the Palouse Prairie on Paradise Ridge. See General Response Weeds and Wildlife regarding effects to Palouse remnants and Paradise Ridge. ITD will implement its Vegetation Management Plan that will help to minimize the establishment and spread of weeds from the roadway. Other mitigation measures such as access control, revegetating bare soils, reducing cut and fill slopes, as possible, and constructing farmable slopes are also included in the FEIS Chapter 9, Environmental Commitments. Additional information regarding the Palouse Prairie ecological system, including the roles and impacts to pollinators, plant diversity and the functions of CRP lands have been added to the FEIS Sections 3.8 and 4.8.

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			capacity. From our farm, we do business and personal commerce from Thorn Creek to Lewiston and appreciate the improved safety and capacity of the south portion of Hwy 95. We look forward to the improved safety and higher capacity on the north Highway 95 realignment. Our family farm, in its fourth generation of operation, is located on the west side of Hwy 95 along Thorn Creek Road and to Reisenauer Hill, as well as the east side of Paradise Ridge. We also have the privilege and responsibility of caring for the Palouse Prairie and woodlands we own on the west and east slopes of Paradise Ridge. The west route replaces Idaho's and the world's prime agricultural with Highway 95 for all time. This is the least favored route according to the studies and citizen comments. All routes greatly improve the safety and capacity of Hwy 95. Therefore, our comments reflect on one question we ask ourselves often as stewards of agricultural, native prairie, and other lands*: Is there value to preserve Idaho's largest and most diverse Palouse Prairie remnant?* We hope our response to this question, located on the following pages, will be helpful in your review of the east and central routes. How do we do the least harm to this heritage land? The Palouse grassland does not face serious threats from agriculture because nearly all of the habitat has already been converted. Degradation of the remaining fragments continues to be a problem..." - World Wildlife Fund (NA0813). The degradation, caused by weeds and development, is less plant	

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			diversity. Based on the DEIS Prather & Lasser (2007) study on weed migration and invasive behavior, and studies by the Federal Transportation Administration, highways become weed corridors from 0.6 miles of the highway edge. As the caretakers of this land, we know the difficulty in preventing stray invasive weeds from getting a foothold, and eradicating or controlling present weed invasions. We, along with our employees, spend hundreds of hours yearly searching and then either hand pulling or spot spraying invasive weeds on Paradise Ridge. As land stewards of the largest congruent Palouse prairie in Idaho, we ask for your assistance in maintaining its health and diversity for future generations. We are a family that has deep roots with the land on the Palouse. However, if we want to be 'native to this place' as farmers and citizens of the Palouse, today and in the future, we need to respect the prairie, the memory it holds and the lessons can it can teach us. Please feel free to contact us if you have questions at (208) 882-9143 or at JLWJensen@gmail.com. Sincerely, Wayne and Jacie Jensen – Is there value to preserve Idaho's largest and most diverse Palouse Prairie remnant and ecosystem? The Palouse Prairie has value to us as farmers in the Palouse region. – Our best teacher is the land itself. As farmers we observe the prairie in awe of its	

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			efficiency, its sustainability, and its sufficiently to balance soil, water and air. This balance is as important to agriculture as it is to nature. Nature may not provide the final answers, but it is worthy of our attention. For over twenty years on our farm we have implemented soil-saving tillage and waterway practices, and soil-health crop rotations and micro-nutrient practices. We continue to adapt to new farm practices as the science in soil health and conservation advances because what happens below ground directly impacts what grows above ground. Our Palouse soil is our life-blood. – Science is beginning to understand how much our native soils have to teach us. For us as Palouse farmers, the Palouse prairie is a teaching and research laboratory for our grain, legume and brassica operations. By practices such as lengthening crop rotations, introducing animal and perennial crops with different roots structures and diversity, replenishing specific micro-nutrients and micro-biotics, and attempting to bring our rising soil pH back to normal levels, we have begun a highly simplified approach to mimic the prairie as closely as practical. We are attempting to keep our Palouse soils healthy for four more generations. We have learned to view our farm as a whole system, not as individual crops with individual inputs and outputs needs. Wheat is our cash crop, but crops like peas and barely will continue to have important non-economic role on our farm. Like the	

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			Prairie, it is not the individual flora and fauna species that make a healthy and balanced ecosystem, but the interaction and interconnection over time of all species in a place. An intact healthy Palouse Prairie ecosystem leaves us in agriculture and other land management with options to discover the answers to questions we do not even know yet to ask. To be good stewards of all our lands, it is important we have a baseline – a reference point. In the Palouse agricultural region that reference point is the Palouse Prairie. Our native grass and forb (wildflower) seed farm operation depends upon a healthy Palouse prairie ecosystem on Paradise Ridge. *The best land solutions are built upon the uniqueness of each place.* On the Palouse, soil-erosion is the biggest threat to its agricultural land. Our farm land east of Paradise Ridge, with its historical lower soils depths, was the place we chose to start implementing no-till conservation tillage and using the Conservation Resource Program. In 2004, when the wheat price was $3.00/bushel, we knew we had to make changes on fields with lower than average production but require the same inputs. Once again, our land east of Paradise Ridge is where we chose to increase our farm diversity by growing crops that have grown here for a millennium – native grasses and fobs (wildflowers). Our thought was "If the native grasses and wildflowers can grow on this soil without our assistance, can we grow them for seed	

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			for public and private seed markets, and for the use on our own land?" At the time native Palouse wildflower seed was not available on the market. Today we have approximately 400 acres of 10 species of native grass seed and 30+ acres of 5 species of native wildflower seed in production on our farm. All of our native wildflower fields and 2 of our grass fields originate from seed collected on the prairie on Paradise Ridge. An additional species of Paradise Ridge Palouse wildflowers are in production in an acre seed-increase field for future seed production fields, small order sales to land owners, University and government research and restoration projects and nurseries. *Pollinators from the Palouse prairie on Paradise Ridge required for seed production* As with many US crops, our native wildflower fields require pollinator to produce seed. The Palouse prairie ecosystem on Paradise Ridge provides over 20 different native pollinator species for our native wildflower production. As of today, we have not had to pay for additional pollinator services. Current research at the University of Idaho is indicating that an increase in invasive weeds and a decrease in native or non-native grasses in natural and pasture lands, decrease the survival of birds possibly to due to the weeds not supporting the protein (insects) required during bird breeding and fledgling feeding. Our natural lands and agricultural production are interconnected on our farm. The Palouse prairie is increasing the diversity of all our natural and non-farm land.	

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			Over time, our Conservation Reserve Program (CPR) land has increased in flora and fauna diversity by native wildflower species moving out from the prairie and into to the adjacent non-farm land. To reduce the time it takes nature to increase CRP diversity on its own, we are working in cooperation with the Pullman Plant Material Center USDA-NRCS, on four research project areas on our Paradise Ridge land. The purpose of the project areas is to determine the best seeding methods and specie mix to increase wildflower diversity and therefore all diversity in retired farm land and CRP. This information will be shared with landowners. *The key is not the just the Prairie itself, or the individual species, but the diversity of species in a given habitat on Paradise Ridge.* Attached is list of plant species found on our prairie land on Paradise Ridge. This list does not include the mosses, lichens, fungi and such that flourish as the biotic soil crusts that protect the space or "skin" between prairie plants of the Palouse. Regional researchers are just now attempting to identify the mycorhizes associated with the prairie plants located on (*comment cut off-never received*)	
L-39	Paradise Ridge Defense Coalition	–	Please see attached petition (113 pages)	See General Response Weather-2 regarding the 5-month data set and how it relates to the larger 30+-year data set. See General Response Weather-3, Weather-4 and Weather-5 and Weather-6 regarding elevation, wind, fog, ice, precipitation, and snow. See General Response Safety-3 regarding safety on the existing US-95 if the E-2 Alternative is selected. See General Response Weed and Wildlife regarding the

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				effects of the E-2 Alternative on Paradise Ridge and Palouse remnants. See General Response Safety-6 regarding the significance of the difference between the lengths and safety of the alternatives. The E-2 Alternative is identified as ITD's and FHWA's Preferred Alternative primarily because it would have the greatest safety benefit. Over the 20 year design period the E-2 Alternative is predicted to result in 9 fewer deaths and injuries. ITD's goal is to provide a safe roadway for all users which includes people that live in the corridor, local commuters, business employees and owners, truck drivers, university students as well as regional and international travelers. Slower speed limits other modifications of the existing alignment are addressed in General Response Safety-4. See General Response Maintenance-1 regarding maintenance costs.
L-40	Michael	Haseltine	20 February, 2013 Adam Rush, lTD Public Involvement Coordinator P.O. Box 7129 Boise, ID 83707 – Dear Mr. Rush, I attended the public hearing on 23 January, 2013, talked with several of the people there to help us understand this project, and have spent considerable time since then studying the DEIS material and talking with local people about this project. In the end, what I don't comprehend is ITD's commitment to the E-2 Alternative. You will see throughout this letter the tread of it appearing	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 alternative was developed through a process of identifying a range of reasonable alternatives then screening them based on the purpose and need as well as human and natural environmental impacts. See General Response NEPA. The number of access points is considered as part of the modeling for the safety analysis. The AASHTO Highway Safety Manual uses the number of commercial, residential, and industrial approaches in

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			to me as though ITD started this project with the solution in mind and fit their arguments to that end. It has left me with the overriding question of what is the real, unspoken, factor that is influencing ITD's choice. Whether this is true or no, unfortunately it will never be disclosed. That speculation aside, here are what I see are the issues with ITD's preferred alternative. – First, it appears that ITD's argument in favor of E-2 seems to be based primarily on safety issues. However, there are a number of ways in which safety issues could be mitigated. For instance, the number of access points for C-3 is greater than for E-2, but the number is not the real issue; that's only a way of using a number to make a point. The real issue is how those access points are handled, and any access could be handled in a way to make it safer. Another safety issue relates to weather. One error in this part of the report is that the weather data used in the analysis is scanty and biased by being for only part of a year, and an anomalous year at that (the year 2005 being warmer and dryer than usual). In addition, it doesn't take into account the fact that E-2 stays at a higher elevation longer and is through an area more prone to fog and ice. Clearly, the safety study should be re-evaluated with proper climate data and take into account the weather specific to each alternative. However, in my mind these concerns are not so telling as the fact that *all* of the routes being	its formula's to predict crashes. The formulas predict a greater number of crashes on highways with more commercial, residential, and industrial approaches. The level of design for an EIS is typically at a very rough concept level and the level of analysis should be similar between alternatives. ITD does not work with landowners on right-of-way or access details during this concept level of design. This is typically completed during preliminary and final design after the EIS process has been completed and when detailed survey and geotechnical information is available. See General Response Displacement-1 regarding clarification of the residential and business impacts. See General Response Weather-2 regarding the five-month data set and how it relates to the larger 30+-year data set. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, ice and weather related road conditions. While the original weather report utilized appropriate methodology and had valid findings, a supplemental Weather Technical Report has been prepared to address public comments as described in General Response Weather-8. General Response Safety-6 explains the significance of the differences in safety between alternatives. See General Response Agency regarding the difference in ITD and agency opinion regarding the Preferred Alternative. The wildlife experts that evaluated the existing conditions, project impacts and made mitigation recommendations provided consistent findings that were stated in the DEIS and FEIS. They found that the

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			considered are safe. Highway 95 goes over many other places in its long run that are equally high and prone to bad weather. Federal regulations set standards of safety for our highways, and ITD knows how to make safe roads. I know safety is a hot-button issue with the public, so it appears to me that ITD is playing that issue in order to have the decision fall where it wants it. Why it wants it there is not yet clear to me. Please note also that the DEIS states "Any of the proposed Action Alternatives would reduce the projected crash rate for this segment of US-95 by more than 50 percent," so none of the choices would be unsafe, and they all would be a substantial improvement over the current road. My real concern is environmental. It seems that the environment always takes a back seat to things like cost, efficiency, or something else that translates to "lets barge ahead and get this done the easiest, fastest way possible." IDFG thinks that E-2 has more suitable wildlife habit than either of the other two choices, to the tune of requesting more than twice the amount ($750,000 vs $325,000) be allotted for mitigation. In addition to IDFG, EPA and USFWS don't like E-2 either. It seems that ITD has taken the input from all the wildlife experts and distilled it down to favor what they would like to do, not what that data really say should be done. The crux of it is that Paradise Ridge is an important bit of the environment, in terms of habitat, wetlands, native plants, and especially as one of the largest remnants of Palouse Prairie remaining. My	project area does not contain any critical ungulate habitat or high quality habitat and that the E-2 Alternative would not result in population level impacts to ungulates. This was confirmed as well by the IDFG Wildlife Linkage Report that identified a 1.98 mile segment of E-2 as a low priority linkage area. The wildlife experts made optional recommendations that could lower potential animal vehicle collisions. Clearing roadside vegetation, improving sight distance and improving shoulders and clear zones are mitigating measures that have been proven to lower animal vehicle collisions on US-20 by 85 percent. The findings of the reports are not distilled but are explained in the FEIS Section 3.8 and 4.8. It is stated throughout the DEIS and FEIS but primarily concentrated within Section 4.8. Mitigation measures for wildlife and vegetation have been added to Chapter 9 Environmental Commitments. ITD recognizes the local importance of Paradise Ridge and the wetlands, native plants and Palouse Prairie found there. The E-2 Alternative would avoid directly impacting Paradise Ridge; however, there may be indirect effects due to weeds. See the FEIS Chapter 6 about the indirect effects. See General Response Weeds and Wildlife. See the FEIS Sections 3.2 and 4.2 for clarification regarding how Ring Road was considered. ITD is currently working with the City of Moscow on the Gateway Beautification Committee.

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			wife and I have put a great deal of effort into removing horticultural, invasive, and non-native plants from our small property and planting Palouse Prairie natives because we think it's that important. We don't live on Paradise Ridge, so it's not a matter of "not in my back yard". It's that we value native ecologies rather than we've heard it's a good idea. We put our work into what we believe is important. Paradise Ridge is not as undeveloped as, say, Kamiak Butte or Steptoe, which are protected now, but if it's the best we have, we should do the best we can to avoid messing it up when it can be avoided. Clearly alternative C-3 is better in this regard than E-2. Displacements is another concern in this project. The DEIS indicates a preference for E-2 over C-3 because it has fewer displacements. However, at the that January 23rd meeting, I was told that, in fact, no businesses will be displaced, and the widening of current US95 in the C-3 corridor would have no effect beyond a potential noise increase. I realize that there is a lot of concern over displacements, and that usually the only ones that notice are those being displaced, so they often stand in a minority, and I don't want to gloss over the impact it has on those people or businesses, but where's the truth? If they are not really being displaced and noise is the only factor, then in my mind it is a much lower level concern, and it certainly doesn't rise to the level of environmental factors. I would also like to reiterate something a friend	

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			learned from a conversation with Tim Long, District Right of Way Supervisor: apparently E-2 would displace the most residents because of issues with a displaced well and that ITD had decided to relocate all of the residences within the mobile home park and a house above the park on Eid Rd. He apparently also stated that only one residence would be displaced along the C-3 route. This information is very different than that presented at the public hearing on January 23rd and in the DEIS, which states that C-3 would displace 7 residences and E-2 would displace only 5. Again, I'm left to wonder why ITD is interpreting the data the way it does. One factor that concerns me a lot is with regard to how this work would mesh with plans for a Moscow bypass and/or ring road. It's hard for me to fathom how ITD could not address this as part of the US95 realignment. To start with, it's totally absurd that a major highway like US95 still goes through downtown Moscow! And yet no one wants to acknowledge this elephant in the room. Does ITD figure that it can be delayed enough that your successors will deal with it rather than yourselves? Well, rest assured that I don't think this is what you should be doing. I think ITD and the city of Moscow should be working this out together, and nothing started on the US95 realignment until the overall plan is in place. There is so much evidence here that urgency is taking priority over the best solution, on the part of ITD, the city of Moscow, and Latah County, and I don't agree with that approach. It's	

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			not cost effective in the long run, and is less likely to deliver the best results. Another argument from the DEIS report (pg. 147) is that the C-3 Alternative would convert the least acres of prime farmland and farmland of statewide importance to other uses. It's a factor that doesn't grab the attention of many people, but our farmland is slowly getting converted to residential or other uses. I think this has a long term consequences ITD should not ignore. That sums up my perspective on the US95 realignment. I strongly support the C-3 alternative, primarily on environmental reasons, but there are a number of other reasons why C-3 is a better choice. I hope the work you put into a final EIS is more accurate and better analyzed than is the case of the Draft EIS. Thank you for your attention. Michael Haseltine 1372 Four Mile Rd., Viola, ID 83872 (208) 882-6215 haseltine@moscow.com	
L-41	Ray and Nancy	Richmond	Ray and Nancy Richmond 3672 HWY 95 South PO Box 9713 Moscow, Idaho 83843 – January 25, 2013 – Adam Rush Idaho Department of Transportation Public Involvement Coordinator	Thank you for your detailed observations regarding accidents, ice and fog and elevation as well as information regarding ungulate behavior in the area. All of the action alternatives would include creating a four-lane divided highway with improved shoulders, clear zones and sight distance. The elements of the proposed typical section would greatly improve safety for your family and other travelers. Of those, the E-2 Alternative would offer the greatest safety benefit as described in General Response Safety-3.

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			P.O. Box 7129 Boise, ID 83707-1129 We live approximately a quarter of a mile north of Snow Road on the east side of Highway 95 which is in the middle of the Thorncreek Road to Moscow Highway 95 project area. Our house is located approximately a hundred yards from the highway. Our property is one of the original Snow brother's homesteads. The comments that follow reflect our concerns, our support of the E2 alignment for the Thorncreek Road to Moscow Highway 95 Project, and support of the Idaho Transportation Department's draft EIS for that project. Our concerns focus mainly on safety issues. First the current unsafe conditions of Highway 95 in the study area and particularly the stretch of road that runs adjacent to our property. Just in the last week Nancy was in the south lane waiting to turn across traffic to enter our driveway when a pickup, coming up behind her, failed to see her until the last minute and passed without slowing down on the narrow outside shoulder with horn blaring. It was broad daylight in the middle of the day with nothing to impair vision and she had been signaling all the way from the top of the hill. (I did verify that her turn signals and taillights were working.) It is remarkable that the pickup made it past without rear-ending her or turning over in the ditch. It is inconceivable to me that the driver could not see her Subaru station wagon (big and white against a black road surface). This is not unusual as both of us have had many similar narrow escapes. Statistics would	Additional information regarding safety as it relates to speed limits is provided in General Response Safety-4. Regarding the botanical and wildlife value of Paradise Ridge see General Response Weeds and Wildlife. Regarding weather, your detailed observations are consistent with the findings of Russ Quall, the State Meteorologist who prepared the original Weather Technical Report. A The Weather Analysis was revised and summarized in the FEIS Sections 3.10 and 4.10. See General Responses Weather-3, Weather-4, Weather-5, and Weather-6 regarding elevation, temperature, ice, snow and fog. General Response Weeds and Wildlife regarding effects to vegetation and wildlife. See the FEIS Chapter 9, Environmental Commitments regarding mitigation for impacts to wildlife, biological resources, landscapes and homeowners. Mitigation measures for wildlife impacts include reducing animal vehicle collisions through improving sight distance, clearing roadside vegetation, providing wildlife passage through county road underpasses and designing stream crossing to allow small terrestrial animals to pass. Residences and businesses that are impacted will be considered as part of the Uniform Relocation Act, which is summarized in the FEIS Appendix 5, Uniform Relocation Act.

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			suggest that it is only a matter of time and the odds will catch up with us. I worry terribly about my four grandchildren who live in Moscow and often visit with our son and daughter-in-law. An additional concern is that many drivers think that because the portion of highway that passes our property is a gently curving stretch of road, they can speed at 70 or 75 mile per hour. This happens with frequent rapidity. I don't know if it is because they feel that they can make up for time lost on slower portions of the highway north or south of that stretch, or if it is the first place they feel that they can pass a car that is already traveling at the speed limit but slowing them down, or exactly what. I do know that there is a huge difference between how local drivers respect the dangers of the road and the apparent perceptions of others. There seems to be a prevalent attitude among many 95 travelers that this stretch of road is a 4 lane interstate instead of the 2 lane cow path that it really is. So please expedite the process without delay. The sooner we have a safe alternative in place, the better for all travelers on 95. We are also concerned about the safety issues connected with construction of the W2 and C3 alternatives, particularly the C3 alternative as it tracks much of the existing Highway 95 footprint. The E2 preferred alternative will have considerably less impact on traffic, and therefore construction safety, because it only affects the existing highway at the ends of the project. The north facing slope of Reisenauer Hill, shaded by	

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			steep inclines on the east side of the road, has led to many accidents due to slick road surfaces and orientation. Relegating Reisenauer Hill to local traffic by building the E2 alternative would remove the issue for the highway (which would still be an issue in both the W2 and C3 alternatives as they follow the old 95 footprint down Reisenauer Hill). The E2 alternative not only eliminates the north face of Reisenauer Hill but also eliminates an additional hill to be traversed on the north end of the project (Valhalla Hill for C3 and Clyde Hill for W2). The following comments are a rebuttal to comments in opposition to the E2 preferred alternative. Many opponents to E2 represent Paradise Ridge in terms implying a pristine environment. From a Landscape Ecology point of view, Paradise Ridge is of low value as a botanical niche and as wildlife habitat. Existing plant populations and patch sizes are insufficient to remain viable, and in most cases without corridors or "bridges" to connect them. If there were no structures, no domestic herbivores (including horses), and no roads, then maybe there would be sufficient geologic and biological structure to support a pristine habitat, but I doubt it. Paradise Ridge is an island unto itself, subject to plant invasion and susceptible to the incursion of the human species regardless of the presence of the E2 alternative. There are some vestiges of Palouse Prairie (not located in the E2 alignment) for which every effort should be made to protect and	

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			mitigate, even though they are on private property. The sad truth is that Paradise Ridge is mostly privately owned and a desirable location for housing development, and developers and speculators continue to respond to market demands to further develop the Ridge for residential purposes. Existing land parcels will continue to be subdivided until there is a matrix of housing and roads further fragmenting the biological/ecological landscape. The clock cannot be reversed, no matter the dedication and efforts of those who dream of a pristine Paradise Ridge. Pristine ended when the first settlers began to utilize the resources on Paradise Ridge. A black and white photograph (which you can see in the lobby of the restaurant just south of the intersection of 95 and Palouse River Drive- currently the Iron Wok) is a historical picture looking south and east from the CCC camp to Paradise Ridge and in that picture a very different ecology is present. The vegetative community that is present now is the result of CCC tree plantings in the 30s and not typical of pre settlement. The Palouse prairie was a fire ecology driven process and very different from what now exists on Paradise Ridge. The mantra of those who oppose the E2 alignment is "Don't Pave Paradise". And yet every time they put in another access road or build another house or out building, they are reducing the permeability and degrading the structure of the soil that supports the ecosystem they desire to protect. The weather that is prevalent in the study area can	

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			be extreme in any location and at any elevation. The study corridor is narrow and the alternative alignments relatively close together. Because the E2 alignment is the safest, least disruptive, and least expensive alternative we support it above the other two. Most people tend to take a static view (a snapshot if you will) of the weather conditions at any particular time and place and use that for comparison. In reality, what we call "the weather" is a dynamic, ongoing, hydrologic process not bounded by artificial lines drawn on a map. Over the last several years we have lost large portions of roofing due to wind, first from our garage and then from our house (and that with a shelterbelt of trees to break the winds intensity). That same wind that removed our roofing came out of the southwest and blew up the slope with the same ferocity to Paradise Ridge. Ground fog, that starts out at the base of the ridge as a band, travels down the slope and eventually across our place. At any particular time it may be clear at our place and foggy to the east up the slope. Yet, through the dynamics of ground and air temperature, humidity, and other atmospherics, the belt of fog will move down the slope so that we are eventually in fog and everything above is clear. Depending on conditions, a fog belt may move up or down in elevation. Even on the ridge itself, conditions and resulting effects will differ between the north face, the west face, and the south face at any given time. I travel 95 through Moscow every workday and back again each evening and Nancy traveled to work at a	

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			biotech lab on the south outskirts of Moscow which faces the ridge and back each afternoon or evening. We both have observed the north and east face of the ridge for many years, in all conditions, and for extended periods of time. In our observations, there are times when there is a prevalent fog on the north face of the ridge extending north down towards the lower reaches of the agricultural land, that seldom comes far enough west to reach the proposed roadbed of the E2 alignment as it rises from Moscow and turns south along the base of the ridge. From where we live, we sometimes see a fog cap that sits on the top of the ridge but seldom comes further down the west slope than the base of the tree line. What causes that phenomena, I can only guess at. The obvious point is that the fog cap and the north face fog bank rarely reach as far as the E2 alignment. We have observed that the atmospherics that produce black ice and hazardous driving conditions, occur at differing elevations and times during the day (or season), the most severe being due to highway shading on the north sides of Reisenauer and Valhalla Hills. If we have a dry year, then both the low and higher elevations in the study area get less snow. In wet years all elevations get more snow. But the overall proportional differences between lower and higher elevations in the study area are minimal and remain the same regardless of a dry or wet year. There seems to be a mistaken perception that wild ungulate populations travel a north/south traverse along the corridor. In reality, these wildlife	

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			populations are small and traverse east/west (particularly at the north base of Reisenauer Hill), following the ridges into Washington State where they have higher quality habitat (including orchards left from old homesteads) and return to graze on shrubbery planted around human habitations on Paradise Ridge. Their egress crosses all three of the alignments, but would be least impacted by the E2 alternative. We both feel strongly that ITD should make every effort to mitigate the impacts to wildlife, biologic resources, landscape, and impacted homeowners. Those who will lose their homes, that in some cases have spent their lifetimes developing, should be fairly compensated. By fairly, I mean replacement in a comparable setting. Current appraisals, in most cases, are considerably under what it will cost to relocate to a like structure, landscape, and acreage because of the litigation which has delayed the project for so long. These landowners should not be penalized by the actions of others and circumstances they did not propagate themselves. In some cases, it may be advisable to provide the homeowner the option to have their structures moved to a comparable setting, trading land with the homeowner-and providing infrastructure to make the property fully functional. We fully agree with the ITD DEIS assessment regarding wildlife, plant, and landscape resources. We both strongly believe ITD should ensure that environmental mitigations be local and serve to replace the resource in the affected area, rather than cash	

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			payments to another agency looking to augment their operating budget. Where possible, small and un-farmable fragments of agricultural land, resulting from the E2 easement, should be purchased from land owners and dedicated to mitigate wildlife and plant habitat. Overall we were impressed with the thoroughness and completeness of the draft EIS and applaud the ITD document, both its analysis and conclusions. It is now time to move on without delay and get the road built. We both support the preferred alternative route E2 and encourage implementation of that route from Thorncreek Road to Moscow. Sincerely, Raymond and Nancy Richmond	
L-42	Steve and Mary	Ullrich	Steve and Mary Ullrich 1133 Paradise Ridge Rd. Moscow, ID 83843 February 19, 2013 Adam Rush, Public Involvement Coordinator ITD Office of Communications P.O. Box 7129 3311 W. State St. Boise, ID 83707-1129 Dear Mr. Rush, For us, this opportunity to communicate with you regarding the DEIS and ITD's selection of a new 4-Lane Highway South of Moscow, is of great importance. We feel the final decision must be based on very sound and unbiased consideration of safety, the total environment impacted, and the	General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. The decision of which alternative is selected will be based upon the ability for the alternative to meet the project purpose and need as well as the effects to both the human and natural environments. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The amount of right-of-way is one of the many factors that must be weighed between alternatives. There is no specific requirement under NEPA that requires or precludes selecting the alternative that requires the least amount of right-of-way. General Response Schedule describes the next steps in the environmental process and the anticipated

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			community most directly affected by this action. We hope you will read our comments and all those sent in with serious consideration. – Thank you, Steve and Mary Ullrich Cc: EPA Region 10 Office, Seattle EPA Office, Boise Idaho Dept. of Fish and Game, Lewiston Idaho DEQ, Lewiston US Fish & Wildlife Service, Boise Scott W. Reed, Attorney, Coeur d'Alene – TO: Adam Rush, ITD Public Involvement Coordinator FROM: Mary and Steve Ullrich, Moscow ID ITD's preferred new Alignment for, US 95 Thorncreek Rd.- Moscow should be C-3, the central route! Consider ITD's Project Purpose, Federal Highway Policy, and EPA Policy. Then, determine which alignment best meets purpose and policy. ITD's Project Purposes: Build a Safe Road and Increase Capacity W-4, C-3, and E-2 ALL meet these purposes Fed. Hwy Policy for new Hwy: Use the least new ROW (unpaved land) C-3 uses the least new ROW EPA Policy for new Hwy: Make the least impact to the environment C-3 has the least impact on the environment E-2 has the most impact on the environment Clearly, C-3 is the logical choice for the new alignment of US Hwy 95 S Thorncreek Rd.- Moscow!	schedule. See General Response Maintenance-1 regarding maintenance of the existing US-95. The reference to the USDOT Act is applicable to Section 4(f) resources which include National Register Eligible resources and publicly and accessible wildlife refuges and parks. It does not apply to private recreational property.

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			Even those who have in the past promoted E-2 now cry, “Finish the US 95 Project... C-3 is acceptable!" (Lewiston Tribune, LTE- Feb. 3) In fact, C-3 is preferable according to IDFG (Idaho Dept. of Fish and Game), USFWS (Fish and Wildlife Service) and the EPA (The Environmental Protection Agency). (DEIS, Executive Summary, page 16) A letter from IDFG, 10/26/07, (DEIS Appendix 1) states: “In closing, we feel it is important to repeat one additional mitigation recommendation we have made in the Wildlife Assessment and at every opportunity: We recommend avoidance of the eastern alignment. It has been IDFG's position from the start – a position supported by recommendations from the other resource agencies-... We recommend avoidance of alternative alignment E-2." ITD asked for input from these key agencies, but then ignored it! Why? ITD had 2 other acceptable alternatives to work with. Why did it continue to try to justify choosing E-2? C-3 is a safe alternative. The DEIS Safety Report states, "AII existing alternatives would meet the ITD Design Manual and AASHTO (Assoc. of State Hwy and Transportation Officials) standards. "AII existing alternatives will flatten curves to the AASHTO standard." Unfortunately, if E-2 is built rather than C-3, Reisenauer Hill and the dangerous descending curve will remain as is, becoming a county road. Still unsafe! For the local population south of Moscow, this unimproved county road will be necessary for daily use as well as access to emergency services. The DEIS, "Environmental Consequences", 4.10.4	

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			"Emergency Response Time" states, "The C-3 Alternative would provide the most convenient access and best emergency response times to the population on the existing US 95.." "The segments of existing US-95 that may be turned over to the North Latah Highway District would be utilized for local circulation and emergency service access." Although some belittle preserving remaining treasures of Paradise Ridge's ecosystem, this is another critical reason to choose safe, acceptable Alignment C-3. There is so much to lose, unnecessarily, by cutting a huge swath across the shoulder of Paradise Ridge. It is NOT NECESSARY! The US Department of Transportation Act of 1966 states, "It is the policy of the US government that special effort should be made to preserve the natural beauty of the countryside..." The DEIS (4.17 Irreversible and Irretrievable Commitment of Resources) states, "To the greatest extent possible, the Action Alternatives would use existing right-of-way." Therefore, the alignment taking the least new right-of-way and preserving the natural beauty of the countryside should be the first choice of ITD for the new 4-lane Highway. This points to selecting C-3! Finally, C-3 should be the preferred alignment rather than E-2 for many more reasons; E-2 would require far more new Right-of-Way, would impact twice as much prime farmland, would impact twice the acreage of wetlands, would create 7 times more noise impacts, would be subject to more extreme winter weather hazards, would affect 2 domestic	

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			wells causing an entire trailer village to be displaced, would increase the likelihood of vehicle-ungulate collisions, would negatively impact 24 of the last remnants of the original Palouse Prairie and bisect a prairie restoration site, destroy up to 4 acres of a pine stand - habitat for a number of rare species, and would have the greatest negative visual impact. Thus, the action of building the E-2 Alignment would do irreversible damage to the unique ecosystem of Paradise Ridge. Please follow the most responsible and correct choice and build the C-3 Alignment!	
L-43	Paradise Ridge Defense Coalition	–	Paradise Ridge Defense Coalition (PRDC) Comments Addressing the U.S. 95 Thorn Creek Road to Moscow Draft Environmental Impact Statement (DEIS) & Section 4(f) Evaluation – ITD's Project Purposes: Build a Safe Road and Increase Traffic CapacityW-4, C-3, and E-2 ALL meet these purposes and are acceptable to ITD. ITD's stated preference is alternative E-2 – The comments herein concentrate on Alternatives C-3 and E-2. There is little support for Alternative W-4 due to its greatest length, farmland destruction, and cost. There are strong objections to choosing E-2 and strong recommendations for choosing C-3. – Below are comparisons primarily between C-3 and E-2:	While many of the statements in your comment are valid and are stated in the DEIS, there are a few inaccuracies that require clarification. While 7 residences would have noise levels that reach the FHWA noise impact criteria, 5 of those residences were due to be displaced and would therefore, no longer be considered to have noise impacts. In addition, the cost that you quoted for the noise wall for E-2 would not be a factor because a noise wall was not determined to meet the cost benefit criteria and therefore would not be constructed. FHWA does not have a requirement to use the least new right-of-way for new highways. While this is one consideration, there are many other considerations including ability to meet project purpose and need, impacts to residences and businesses and other environmental effects. It was determined that the E-2 Alternative would have no population level impacts and that wildlife crossing structures would be ineffective due to the lack of land

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			CONSTRUCTION Federal Hwy Policy for new Hwy: Use the least new Right Of Way (ROW). C-3 uses less new ROW vs. E-2 Construction Cost: C-3- $43 million, E-2- $46 million Engineering: Maximum Cut Height: C-3 - 50 ft., E-2 - 128 ft. Maximum Fill Height: C-3- 50 ft., E-2- 83 ft. Excavation: C-3 - 2,300,000 yd 3 E-2- 3,126,000 yd 3 ENVIRONMENT EPA Policy for new Hwy: Make the least impact to the environment. C-3 has less impact on the environment vs. E-2 Wildlife Mitigation: C-3 - $325,000, E-2 - $750,000 Noise Impacts: C-3 -1, E-2 - 7 Noise Receptor Mitigation: C-3- $0, E-2- $202,884 Agriculture (DEIS- Farmland Summary of Results, "The recommended alternative from the perspective of impact on farmland would be the C-3 alignment."): Farm Splits: C3 - 4, E2 - 6; Remnant Farms < 20 acres: C3 - 2, E2 – 5; Prime Farmland Destroyed: C-3 - 25, E-2- 51; Total Farmland Destroyed: C-3 -101, E-2 -158 Original Palouse Prairie Remnants within 1 km: C-3 - -14, E-2 --24. More E-2 remnants are closer to the hwy. than those of C-3, and the area of weed infestation impact would reach the summit of Paradise Ridge from the E-2 alternative. Wetlands affected: C-3 1.0 a, E-2 3.6 a Forest stands: C-3 none, E-2 at least 2.5 a of ponderosa pine	use controls on either side. The dollar amount that was requested by IDFG was not agreed to and other mitigation measures were determined to be more applicable to the specific project impacts. ITD and IDFG came to an agreement on mitigation measure for specific project impacts to wildlife and habitat. ITD will work with IDFG before final design to refine mitigation measures. The mitigation measures are described in Chapter 9, Environmental Commitments. See General Response Weeds and Wildlife for information regarding effects to Palouse remnants and Paradise Ridge. See Safety-6 regarding the significance of the difference in safety between alternatives. See Agency regarding the difference in opinions between ITD and the agencies regarding ITD's Preferred Alternative. The residential and business impacts in the DEIS were based on conceptual level detail and not meant to be deceptive. The impacts were evaluated in greater detail after the hearing and clarified in the FEIS to distinguish between impacts and potential impacts but are based on conceptual level information. Exact displacements will be determined during design when detailed topographic, geotechnical and design detail is available. See the General Response Displacement-1 and Displacement-2 for clarification of displacement information. See General Response Safety-1 regarding a frontage road for the C-3 Alternative. See General Response Safety-4 regarding making small improvements to the existing US-95.

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			Considering all the evidence presented above, it would be unreasonable and irresponsible, if not illegal, to consider choosing alternative E-2, which would also have the most negative, irreversible impact on one of the most significant ecological treasures of the Palouse area, Paradise Ridge. The DEIS Section 4(F) Evaluation, 5.1 "Regulatory Framework and Policies", the US Department of Transportation Act of 1966 states that "It is the policy of the US government that special effort should be made to preserve the natural beauty of the countryside ...." It is apparent that ITD ignored the input solicited from a number of key resource agencies and from much of the public from the very early stages of the project. In the DEIS, Executive Summary, page 16, it states, "Idaho Department of Fish and Game (IDFG), The Environmental Protection Agency (EPA), and the US Fish and Wildlife Service (USFWS) prefer the C-3 Alternative to the E-2 Alternative." Furthermore, a letter from IDFG dated Oct. 10, 2007 (Appendix 1 of the DEIS) states: "In closing, we feel it is important to repeat one additional mitigation recommendation we have made in the Wildlife Assessment and at every opportunity: We recommend avoidance of the eastern alignment. It has been IDFG's position from the start – a position supported by recommendation from the other resource agencies...We recommend avoidance of alternative alignment E-2." SAFETY The DEIS Safety Report states: "All existing	General Response Safety-6 explains the significance of the differences in length and safety between alternatives. See the General Response Weather-2 regarding the 5-month data set and how it relates to the larger 30+-year data set. Providing the "Guide to the DEIS" to the public was an effort to summarize information in the EIS, to notify the public of an opportunity to comment on the DEIS and to attend the public hearing.

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			alternatives would meet the ITD Manual and AASHTO standards... All existing alternatives will flatten curves to the AASHTO standard." Thus, C-3 and W-4 for that matter would both be safe. However, if E-2 is built rather than C-3, Reisenauer Hill and the dangerous descent and curve will remain as is, because it will become a county road and will not be changed to meet AASHTO safety standards. Building C-3 would fix that dangerous section, which so many testified about at the hearing. The DEIS, "Environmental Consequences", 4.10.4 "Emergency Response Time" states, "The C-3 Alternative would provide the most convenient access and best emergency response times to the population on the existing US 95." In addition, E-2 is adjacent to prime ungulate habitat and passes through marginal to moderate ungulate habitat and vehicle -ungulate collisions will be greater than for C-3, which passes through poor to marginal ungulate habitat. DIFFERENCES: SIGNIFICANT OR NON-SIGNIFICANT? The DEIS and the "Guide to the Draft Environmental Impact Statement" Brochure contain misinformation and biased presentation of information which deceives the public. The pros are presented first in the E-2 descriptions and the cons are presented first in the C-3 descriptions. During the ITD public hearing on 23 February 2013, Tim Long, District Right of Way Supervisor, and Carmen Reese, Senior Right of Way Agent, informed that "no businesses will be moved, and widening the current Hwy 95 would have no effect beyond a	

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			potential noise increase." However, in ITD's "Guide to the DEIS" Brochure it states "displacement of 8 businesses" as one of its 4 main reasons for not choosing C-3 as its preferred alternative. In addition, Tim Long said that E-2 would displace the most residents because of issues with a displaced well and that ITD had decided to relocate all of the residences within the mobile home park and a house above the park on Eid Rd. He also stated that only one residence would be displaced along the C-3 route. However, the DEIS stated that C-3 would displace 7 residences and E-2 would displace only 5. It appears that ITD defines "displacement" as "impact" rather than "removal" as the dictionary and most people define "displacement". These "tricks" deceive the public, public policy makers, and more importantly those making the final alignment decision. Further deceptions are contained in the DEIS and its "Guide" based on non-substantial or non-statistically significant differences: It is stated that E-2 would be the shortest alternative (by 0 .09 miles = 475 ft. vs. C-3) "E-2 would result in the greatest travel time reduction." (32 seconds faster than C-3)• That E-2 is the safest route, only considers "predicted rates of crashes". Statistically, the differences are not great; predicted fatal and injury crashes for 2017 are: E2-3.8 and C3 - 4.7. The predictions do not take into account accidents that will occur on the ITD-abandoned "US95", which includes a longer stretch with E-2 vs C-3.	

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			"Estimated Vehicle Miles Traveled (VMT)" C-3 = 31,862 and E-2= 31,433. Significant?• "Estimated Operational Energy Use" C-3 = 50,633 and E-2 = 49,951. Significant?• Although the DEIS states that "approximately 57% of crashes during the past 10 years occurred during inclement weather." The weather analysis was extremely inadequate; Jan. 1-May 31 in 2005, one of the driest, mildest years on record, so the scope did not include snow, wind, and drifting. Moreover, the C-3 corridor was not actually characterized. (Weather stations were only near E-2 and W-4.). C-3, which is between the existing highway (low elev.) and E-2 (high elev.), would escape much of the frost that occurs on the existing route and snow and wind that occurs on E-2.In conclusion, we strongly urge ITD to choose the very acceptable, safe, and responsible alignment, C-3! Respectfully, Paradise Ridge Defense Coalition P.O. Box 8804, Moscow, Idaho 83843 PRDC@Paradise-Ridge-Defense.org – PRDC members include: Local citizens Palouse Audubon Society Palouse Group of the Sierra Club Palouse Broadband of the Great Old Broads for Wilderness Palouse Environmental Sustainability Coalition Wild Idaho Rising Tide –	

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			Cc: Scott W. Reed, Attorney City of Moscow Mayor and City Councilors Federal Highway Administration Idaho Department of Environmental Quality Idaho Department of Fish and Game Latah County Board of County Commissioners U.S. Department of the Interior Office of Environmental Policy and Compliance U.S. Environmental Protection Agency, Boise U.S. Environmental Protection Agency Seattle U.S. Fish and Wildlife Service	
L-44	William H	Goesling	William H Goesling PhD 1141 Paradise Ridge Rd, Moscow, ID 83843 billgoesling@yahoo.com208-596-2001 – Mr. Adam Rush Idaho Dept. of Transportation Office of Communications PO Box 7129 Boise, ID 83707-1129 – Dear Mr. Rush, Thank you for the opportunity to attend IDT's public review on January 23rd in Moscow as many of my questions were answered. I do, however, have several remaining concerns with respect to the possible selection of E2. I have resided for twelve years on the western end of Paradise Ridge which, I believe, has provided some real world observations and experiences on which	See General Response Weather-2 regarding the five-month data set and how it relates to a larger 30+-year data set. The North Latah Highway District will be responsible for maintaining the existing US-95 if it is transferred to them as described General Response Maintenance-1. Information regarding snow accumulation and snowdrifts are also discussed in General Response Weather-4. The information regarding ungulates is the best available information at this time. Information regarding moose relocations has been added to the FEIS Section 3.8. The wider typical section, clearing vegetation along the roadway and improving sight distance will help reduce the probability of animal vehicle collisions. This has been proven to reduce animal vehicle collisions by 85 percent on US-20. See General Response Safety-2. General Response Safety-3 provides information

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			to base my concerns for safety, wildlife habitat and water resources. Safety: I am concerned that the weather conditions measured to not reflect the conditions that actually occur along the northern two thirds of the proposed E2 route. The weather collection site was at the top of Reisenhower Hill where it would not capture the actual wind speeds that occur as the wind is "funneled" to the north of the ridge. Weather collection data was only collected for one year which those of us who live on the ridge know can vary significantly from year to year. Wind will play a significant factor in winter as it moves snow back and forth across E2. Question: Why wasn't more weather data collected? What preventative measures will IDT take to prevent snow drifts along E2? I am specifically interested in the E2 section where IDT proposes to "dig down" 65 feet west of my property. Who would be responsible for maintaining the current Hwy 95 if either E2 or W4 options are chosen? Wildlife Habitat Based on personal observation I am concerned that the project area research did not fully identified the number of moose, elk and deer that reside along the proposed E2 route. For example, this winter our resident cow moose and bull calf have been highly visible. The bull was observed in my lower barn, then two days later on the University of Idaho	regarding the updated Safety Analysis, which considers the remaining sections of US-95. See General Response Safety-4 regarding smaller improvements to the existing US-95. If the E-2 Alternative is selected water features impacted by the alignment will be replaced on the east side to be utilized by wildlife if the sites are compatible with wildlife use and the landowners are willing. The alligator lizard is a species of greatest conservation need as prioritized by IDFG's Conservation Strategy; however, there are no special protections that would be required for this species. There should be sufficient additional habitat located nearby that would continue to support the species. Blasting is not anticipated to displace the band of water that you are referring to. See General Response Water. The contractor is required to engineer and perform blasting in a safe and professional manner. Prior to completing blasting, the contractor is required to submit a blasting plan to the ITD for approval. The blasting plan will provide details of charge loading, blast hole spacing, and blasting sequence among other items. This helps ensure that the blast charges do not become too great. If Alternative E2 is selected, the production rate of the well referred to above will be tested prior to blasting and immediately after blasting to verify that no damage to the production rate of the well was made. If damage is made to the production rate of the well by blasting, ITD will compensate you for the damages, by either paying you money, or drilling a new well. Based on preliminary geotechnical information and

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			campus and several days after that in the Moscow Cemetery. Several days later he was again observed in my barn. Another example is the frequent observation of a herd of approximately 30 head of elk and numerous white tail deer, although the number is much lower due to a blue tongue outbreak three years prior. Question: What control measures will be utilized to reduce the probability of vehicle vs animal collisions? If E2 is selected my farm pond will be one of only two on the east side of E2. What sources of water will IDT provide for wildlife? I have captured and released three northern alligator lizards on my property. Does this species require any special provisions? Water: This is without a doubt my number one concern. The depth and flow rates of area wells indicate a significant but narrow band of water along the north side and southwest side of Paradise Ridge. If E2 route is selected the 65' " dig down" west of my property with the use of explosives could potentially cause a displacement of this band of water. Question: What is IDT'S plan to reduce the probability of such a displacement? If a displacement of this band of water occurs, what actions will IDT take to endure my well is able to supply the water my property requires? Minor Concerns: Use of explosives: What provisions will IDT take to	conceptual level detail, there should be sufficient area within the proposed alternative right-of-ways to accommodate staging, stockpiling and other associate construction areas. ITD will make every feasible effort to keep construction within the right-of-way. If additional areas are needed during construction due to geotechnical constraints or other information, then the impacts would be evaluated during the reevaluation process. Northern alligator lizards have no special protections under federal or state regulations.

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			minimize potential impact on my property and animals when using explosives? Right of Way slopes: Will the right of way footprint be increased or decreased on the east side of E2, if selected, if rock is encountered? In summary, I am sure you have received many verbal and written comments with respect to which route to select. In your selection process I encourage you to place more value weight on the comments of those of us directly impacted by the rout selected, whether it is E2, C3 or W4. Sincerely, William H Goesling PhD	
L-45	Gloria Citizens for a Safe 95	Taylor –	Adam Rush Idaho Department of Transportation Involvement Coordinator P.O. Box 7129 Boise, ID 83707-1129 – Dear Mr. Rush, I am writing this correspondence as an adjacent land owner impacted by improvements proposed to US 95. The well documented lethality of Reisenhaur Hill support a concurrence with ITD's preferred alternative "E-2". I support this alternative after careful consideration, study and dialogue with neighbors, friends and local Businesses impacted by the project. Although I am a staunch supporter of our local environment, I feel that any environmental impacts mitigated to accommodate this project should first and foremost address the protection of human life. The studies provided by	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. General Response Schedule describes the next steps in the environmental process and the anticipated schedule. General Response Safety-5 describes how the different alternatives address safety deficiencies at Reisenauer Hill. General Response Displacement-1 offers clarification regarding residential and business impacts.

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			the FHWA and ITD has substantially addressed the safety benefits of E-2 versus the other alternatives. The main purpose of the realignment slated by these agencies would be to "improve the safely and travel time". I understand that any location of the proposal would have displacement and environmental impacts. No amount of mitigation can alleviate all considerations. The existing US 95 would become a county road that would still service the existing Businesses south of Moscow, resulting in minimal impact. The E-2 route will be less invasive of our streams and wetlands, would not substantially impact air quality and is not located within a flood plain. As a concerned citizen and impacted land owner I would urge ITD to execute the intent of the relocation and observe "Safety First". Thank you, Gloria Taylor, Member Citizens for a safe 95 1020 Zeitler Rd, Moscow, ID 83843	

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			 Citizens concerned for a Safe 95	
L-46	Malena Karen	Braatne Knoff	Dear Idaho Transportation Department, – Safety is the number one concern for the Idaho Transportation Department and residents of Moscow when choosing a new alignment for US 95 from Thorn Creek to Moscow. I strongly disagree with the E-2 alignment. I don't believe one winter report is enough to say this route is safer than C-3. It's hard to believe that a higher elevation route will be safer in the winter. Science proves air is cooler at higher elevations thus producing more ice and snow. E-2 will be in the highest elevation and for the longest distance. Since the primary concern of ITD is safety I think another report should be produced in a harsher winter than the year 2005, which was one of the mildest winters in 25 years. ITD reports that weather influences 57 percent of Highway 95 accidents, so shouldn't there be more data than 1 year showing the weather patterns of each route and thus determining which route is	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Weather-2 regarding the five-month data set and how it relates to the larger 30+-year data set. See General Response Weather-3, Weather-4 and Weather-5 for information regarding elevation, ice, snow accumulation and other weather patterns. The Noise Abatement Criteria (NAC) described in 23 CFR Section 772 (table 1) are very specific on what noise levels constitute an impact. Although the noise might be audible at distances greater than 300 feet away from the proposed road the transect analysis shows that at 230 feet the noise level drops below the NAC of 66 dBA for residences. See FEIS Sections 4.11 and 4.12 regarding visual effects and noise effects, respectively.

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			safer? – I also feel E-2 will destroy the beauty of Moscow due to the noise and visual presence it will have. Reports only record noise 300 feet from the centerline. With E-2 being at a higher elevation it will project much farther than that. ITD admits that E-2 is the noisiest and has the most negative effect on the environment. Visual analysis shows 50% high impact for E-2 compared to C-3 at 23%. The DEIS report shows that C-3 alignment will have less effect on habitat, pine stands, species and farmland. Idaho Fish and Game do not support the E-2 alignment and actually strongly recommends against E-2. I do think this is something to take into effect as well as the safety of the road. – I do think there needs to be a change to the current highway however I don't think E-2 is the best option. I strongly disagree with E-2 based on safety, visual impact, noise and environmental effects it will have in the Moscow area. C-3 seems like the safer route when looking at the facts, as well as the least impact on the Moscow area. Why would you choose E-2 when C-3 seems far superior in all categories? I think we need to get beyond the want to develop and look at the truly safer route as well as preserving the beauty of the Moscow area. If we continue to destroy the beauty of the Moscow area less people will want to live here. – On a side note I am frustrated that ITD has	See General Response Agency regarding differences in opinions regarding ITD and FHWA's Preferred Alternative. See General Response Safety- 6 regarding the significance of the differences between alternatives. The E-2 Alternative was identified as FHWA's and ITD's Preferred Alternative because it balances the human and natural environmental effects with the best safety benefit for the public. It was not identified as the Preferred Alternative due to political, developer or personal gain. FHWA and ITD have been transparent in evaluating and disclosing the environmental effects of the alternatives and the rationale for their decision-making process.

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			leaned in one direction and not clearly explained all the facts to Moscow residents. It's not right to lean in one direction for personal gain or pressure from politicians, developers or city council. When explained to the public E-2 seems like a safer route however when looking at the data and other information gathered by organizations such as Palouse Ridge Defense Council this seems to be partially false or favored in one direction. I request you be completely honest with the residents of Moscow and choose the truly better route for safety and the environment. – Sincerely, – Malena Braatne 919 West C Street Moscow, ID 83843 – Karen Knoff 919 West C Street Moscow, ID 83843	
L-47	David and Darla	Port	March 21, 2013 – State of Idaho Department of Transportation – ITD, – After a thorough study of US Highway project south of Moscow, ID, we endorse the proposed C3 route and strongly oppose the proposed E2 route. These	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Safety-6 regarding the significance of the differences between alternatives. The E-2 Alternative would not go over Paradise Ridge but would be located along its base. See General

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			are our reasons: – We own acres of timber ground and original Palouse Prairie on Paradise Ridge. Some of this comes within 100' of the proposed E2 route. It has been our goal to be good stewards of our property and to keep this area as natural as possible. To our way of thinking, a four lane highway with all the traffic, noise, and ground disturbance certainly isn't in keeping with Nature's way. – The proposed route C3 needs the least amount of new right of way. – Reisenhauer Hill has been the site of several accidents so that stretch of road is in need of revision no matter where a new highway is located. C3 will assure that an upgrade will happen on Reisenhauer Hill making it a safer roadway. – On the proposed E2 route, there is no provision made for the safety of deer, moose, and elk that are present on Paradise Ridge or the safety of drivers who may collide with these large animals. – There is a significant difference in the effects of weather the further up in elevation one goes on Paradise Ridge. There will be more snow, ice, and fog on the E2 route than on the C3 route. ITD's weather analysis of weather conditions from January 2005 through May 2005 (during a drought year) wasn't long enough to give an accurate	Response Weeds and Wildlife regarding the effects of the alternatives to vegetation and wildlife. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Response Safety-5 regarding improvements to Reisenauer Hill. See General Response Weather-2, Weather-3, Weather-4, Weather-5 and Weather-6 for information regarding the data set, elevation, ice, snow, fog, and other weather conditions. Additional information regarding visual impacts has been added to the FEIS Section 4.11. The C-3 Alternative follows the existing US-95 more closely than the other action alternatives but it will have approximately four miles of completely new alignment from Cameron Road to Eid Road. The length of the proposed alternatives will be widened. The shorter sections of new alignment also will have straighter curves and flatter grades.

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			picture of the usual weather conditions on Paradise Ridge. The weather on the Ridge is often different than it is in Moscow. – The proposed C3 route is already mostly a roadbed. If a brand new route following the proposed E2 route were carved, this would make another scar mostly parallel to the existing highway. Two scars on the landscape doesn't seem a necessary visual impact. – We do endorse that highway work on US 95 near Moscow is necessary. We urge that the choice of roadbed be proposed route C3. Thank you. – Sincerely, – David Port Darla Port	
L-48	Al Gary – Palouse Group of Sierra Club and Friends of the Clearwater	Poplawsky Mcfarlane	March 20, 2013 – Adam Rush, Public Involvement Coordinator Idaho Transportation Department – Please accept these comments on the Thorncreek to Moscow Draft Environmental Impact Statement from the Palouse Group of the Sierra Club, and Friends Of the Clearwater. PGSC represents approximately 250 Sierra Club members living in the Palouse region of Idaho and Washington, and FOC represents approximately 700 members from our region.	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See FEIS Section 3.2 for clarification of the Ring Road concept and the consistency of the alternatives on land use goals. See General Responses Safety-1 regarding adding a frontage road for the C-3 Alternative. Frontage roads would not make the C-3 Alternative safer than the E-2 Alternative because C-3 would still have more public road intersections and greater length of five-lane

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			– We strongly support Alternative C-3 as the preferred alternative. Identification of Alternative E-2 is predicated on numerous errors and omissions in the Draft Environmental Impact Statement. In the following discussion we show how the information provided in the DEIS clearly supports Alternative C-3 as the preferred alternative. – SOCIOECONOMIC EFFECTS – According to the DEIS: – + Alternative C-3 requires the least amount of new right-of-way, offering cost savings. – + Alt. C-3 would take the least amount of prime farmland, farmland of statewide importance, and CRP land. Alternative E-2 would take twice as much prime farmland. – + Alt. C-3 would have only one noise effect, whereas Alt. E-2 would have seven noise effects. – + Alt. C-3 would have the least visual impact whereas E-2 would have the greatest impact- more than twice that of C-3. – + Alt. C-3 has been determined by the City of Moscow as the most consistent with city/area of impact land use goals. –	section than the E-2 Alternative. See General Response Access for a description of access control. See General Response Displacement-1 for a clarification of residential and business impacts. See General Response Safety-6 regarding the significance of differences between the E-2 and C-3 alternatives. See General Response Weather-2 regarding the weather sampling data set and how it relates to the larger 30+-year data set. See General Response Weather-1 regarding how weather data for this C-3 Alternative was presented in the Weather Analyses. General Response Weather-3 discusses elevation, ice and other weather related road conditions. See General Response Safety-5 regarding improvements to Reisenauer Hill. See General Response Safety-3 regarding how existing US 95 was considered in the Revised Safety analysis. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Responses Weeds and Wildlife regarding effects to Palouse remnants and Paradise Ridge. See General Response Schedule regarding the environmental process and the anticipated schedule for the project. Litigation is a possibility regardless of which alternative is selected. See General Response Weeds and Wildlife regarding the alternatives' effects to vegetation and Paradise Ridge.

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			+ Moscow city staff consider Alt. C-3 most compatible with a proposed Moscow ring road (see City of Moscow comments) – + Alt. C3 would affect no domestic wells, whereas E-2 would affect two. – + Alt. C3 would have the most access points. This would be most convenient for local residents and provide the best emergency response times to local residents. This also could contribute to a slightly higher accident rate. This negative contribution could be corrected by the addition of a frontage road, which is currently not proposed by ITD. – + Although presented differently in the DEIS, Alternative C-3 would only increase noise effects to eight businesses and dislodge one residence. Alternative E-2 would probably undermine the viability of these eight businesses in the absence of Highway 95 traffic, and will dislodge an entire trailer park (five residences or greater). – = Although Alt. E2 is the shortest (fastest) route, C3 is only 475 feet longer (0.09 miles). – = Alts. C3 and E2 have about equal construction cost. – = Alternative C3 has 4.7 predicted fatal and injury crashes per year, whereas E2 has 3.8. However this safety analysis is flawed for at least four reasons:	ITD and FHWA have identified the Environmentally Preferred Alternative in the DEIS and FEIS. To meet FHWA NEPA requirements, the Environmentally Preferred Alternative must be identified in the FEIS and identified in the Record of Decision (ROD). In doing so they may consider both human and natural resource impacts and if not selected rationale will be provided.

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			– 1) No confidence intervals or p values are provided for these numbers, thus it is not clear if there is any statistically significant difference between the C3 and E-2 crash numbers. – 2) The weather conditions used in this analysis are from only part of one winter (Jan. - May,2005) which was such a mild winter that snow could not even be considered. And even with this inadequate weather analysis, a central alternative was not considered. Alt. E2 stays at the highest elevations the longest, thus will likely suffer the most weather related accidents. – 3) On the north and south ends of Alt. C3 in particular Reisenauer Hill, unsafe sections of the current highway would be corrected. However with Alt. E2 these unsafe areas would continue to exist as county roads, and accidents would continue to happen. This was not accounted for in the safety analysis. – 4) As mentioned above, numerous access points in Alt. C3 make it less safe. ITD failed to correct this with frontage roads, which would result in a better safety rating for C3--possibly superior to that of E2. Thus we consider the safety analysis so faulty that it cannot be used to reliably predict differences in safety between the alternatives. – In the above analysis C-3 is superior in nine	

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			categories, C-3 and E-2 are similar in three categories, and E-2 is not superior in any categories. Even if we cede superiority in safety and distance to E-2, C-3 still clearly wins with superiority in nine categories, compared to two with E-2. – ENVIRONMENTAL EFFECTS: According to the DEIS; – + Alt. C-3 will have the least effect on wetlands, whereas Alt. E-2 will impact more than twice the acreage of wetlands as C-3. This is significant in terms of wildlife habitat and also flood control, in which wetlands play a significant role. – + Alt. C-3 passes through poor to marginal ungulate habitat whereas Alt. E-2 passes through marginal to moderate ungulate habitat. C-3 affects no acres of moderate ungulate habitat whereas E-2 affects 4.4 acres. This is significant in terms of the conservation of native wildlife. Also, better habitat (E-2) will have more ungulates and could increase the likelihood of vehicle¬-ungulate collisions. – + Alt. C-3 has the least new area (acres} of impervious surface. This is significant in terms of the least amount of runoff of pollutants into our streams. – + Alt. C-3 impacts no pine stands whereas E-2 impacts 4 acres of pine stands. E-2 will destroy this habitat for the northern alligator lizard, pygmy nuthatch and long eared myotis, C-3 would not.	

#	First Name	Name	Comment	Response
			– + The DEIS predicts significant negative impacts to Palouse Prairie remnants within a 1 km distance from the highway. There are 14 Palouse prairie remnants within 1 km distance from Alt. C-3, whereas E-2 has 24 remnants within 1 km distance. Also E-2 would bisect a proposed prairie restoration site contiguous with the extremely significant Paradise Ridge prairie remnant. The DEIS weed analysis predicts that negative impacts of E-2 would extend all the way to the top of Paradise Ridge where there is a large, extremely valuable prairie remnant, impacts from C-3 would not. Thus, E-2 would have a much greater detrimental effect on the endangered Palouse Prairie Ecosystem than C-3 – + Alt. C3 would have the least effect on general wildlife – = Both Alts. C-3 and E-2 have 5 stream tributary crossings. – = Alt. E-2 has shorter distances along stream tributaries than C-3, however these stream tributary distances would still be present along the old highway with E-2. – As seen above, Alternative C-3 is clearly superior in six environmental categories, while C-3 and E-2 are similar in two categories. From an environmental analysis, C-3 is clearly superior to E-2 .	

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			– In summary, we request that ITD correct all the erroneous information (weather analysis, safety analysis, analysis of dislocation of businesses and residences) in the DEIS, and then objectively analyze and compare the facts as we have above. If done correctly and objectively, we are confident that ITD will come to the same conclusion as we have. Even if these corrections are not done, alternative C-3 is still clearly the superior alternative, from both socio-economic and environmental standpoints, according to the information in the DEIS. – In an EIS, the Federal Highway Administration and ITD are required to analyze a broad range of alternatives, determine which alternatives meet the stated "Purpose and Need", and select that alternative which meets the purpose and need and has the *least* impact to the human environment. The DEIS states that all three alternatives (E-2, C-3, and W-4) meet the purpose and need. The DEIS clearly shows that alternative C-3 has the *least* environmental impact, and E-2 has the *greatest* environmental impact. Therefore, FHWA and ITD should select alternative C-3 for implementation. The selection of alternative E-2 could make this project susceptible to litigation. – PGSC and FOC strongly urge the agencies to get the job done, and select alternative C-3 for implementation.	

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			– Sincerely, – Al Poplawsky, Chair, Palouse Group Sierra Club Gary Macfarlane Friends of the Clearwater	
L-49	James H. and Zoe A	Cooley	P.O. Box 416 Troy, ID 83871 – March 18, 2013 – Mr. Adam Rush ITD Public Involvement Coordinator Idaho Transportation Department P.O. Box 7129 Boise, ID 83707-1129 – Dear Mr. Rush: – Re: U.S. 95 Thorncreek to Moscow Realignment – We have been following the planning and discussion about the revision of U.S. Hwy 95 for many years and have driven over that stretch of highway over the last thirty or more years. We know what the Reisenauer Hill curve is like and how important it is to improve that segment of the highway. The best choice for realignment and our strong preference is the C-3 alternative which will do the least amount of disturbance to new terrain and which will continue to serve the needs of the local traffic. It makes the most use of the existing	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public including residents, commuters, regional and commercial travelers. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Comment Response Schedule for a description of the next steps in the environmental process and the anticipated schedule. See General Response Safety-5 regarding small improvements to Reisenauer Hill. See General Response Weeds and Wildlife regarding effects to Palouse Remnants and Paradise Ridge.

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			alignment. We strongly oppose the choice of E-2. There is no need to go further east to a higher elevation and to tear up that area for a four lane highway. Those of us who live in this area do prize Paradise Ridge and do not think that route is necessary or desirable. Apparently there are some interests pushing for that choice--probably the trucking industry. But the highways are, after all, supposed to serve everyone and we should also be sensitive about not destroying our local ecosystems. Please register our strong preference for C-3 in this important choice. Thank you for the opportunity to send comment. – Sincerely, – Zoe A. Cooley James H. Cooley	
L-50	Audrey	Squires	22 March 2013 Audrey Squires 508 W. 1st St. Moscow, ID 83843 – Ken Helm Idaho DOT Project Manager c/o Office of Communications P.O. Box 7129 Boise, ID 83707-1129 – Dear Mr. Helm: –	ITD also values the Palouse Prairie and all of the alternatives would avoid directly affecting the Palouse remnants. The E-2 Alternative would be closer to the Paradise Ridge remnant but would not encroach upon it. As you know Paradise Ridge is privately owned and is already developed with residential and commercial developments. Therefore, public access may not be guaranteed. See General Response Weeds. The E-2 Alternative would have Expressway Access Control, which would limit any new approaches onto US-95 thereby slowing new development on the ridge. Additional information regarding indirect and cumulative effects to the project is described in the

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			Children see the world more clearly than we adults do. They are not caught up in politics and are generally unbiased. They have a more basic understanding of the important things in life and how we should interact with the environment. They may not understand the complex economic aspects of a problem, but oftentimes allows for more clarity in decision-making. – My 7th grade students at Garfield-Palouse Middle School in Garfield, WA recently studied the native Palouse prairie and immediately fell in love with it through the photos that they saw, shouting out, "Can we go on a field trip there!" My heart warmed over their excitement, but I was also saddened by the fact that these children, who call the Palouse region home, had never before seen the native habitat. As I am sure you are well aware, only one percent of the Palouse prairie remains, making it not surprising that my students were just learning of it. Before the lesson, they probably would have cited wheat fields as the native ecosystem. I hope to be able to take my students to find some of the remnants of Palouse prairie this spring. But after that, what will happen? If Highway 95 is re-routed through E-2, even less of this important habitat will be around for future class field trips, and even more importantly, for our native species that call the prairie home. – I also understand that there are economic and safety reasons for re-routing the highway. However,	FEIS Chapter 6. Mitigation measures to reduce any indirect effects to Palouse remnants as a result of the alternatives and potential development is described in the FEIS Chapter 9, Environmental Commitments. The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. –

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			as many of my students have aptly pointed out, C-3 should be a cheaper option as it requires less new road than either E-2 or W-4. Furthermore, the study completed to determine the winter weather conditions on the E-2 option was flawed. Collecting weather data during a mild winter will not provide accurate information about the potential hazards that could be observed on the highway if built there. I ask you, how will building a highway at a higher elevation make it safer to drive on in the winter? I urge you to select the C-3 option because it will be a safer route requiring less road construction and disturbing the least amount of native habitat. – We value the Palouse Prairie and hope you will too. – Sincerely, – Audrey Squires – NSF GK-12 Science Teaching Fellow, Gar-Pal M.S. M.S. Candidate, Water Resources, University of Idaho	
L-51	Chad	Hansen, Jr.	Dear Idaho D.O.T. You don't need to destroy something beautiful in the world to make driving more safe!! If you make the new road C-3 you will have more people mad then there are now for the thought of that road. W-4 is a safer rout and you won't be destroying Paradise ridge.	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would be closer to Paradise Ridge than the other alternatives but would not go over it or

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			Would you rather destroy a beuteful land mark or make people drive a little bit further than they would on C-3. If I was to do what you are doing I would chose W-4. – Respectfully, Chad Hansen, Jr	destroy it. See General Response Weeds and Wildlife regarding effects to vegetation and Paradise Ridge. The Ridge is already developed with increasing pressures for residential development and improvements.
L-52	Emma	Gregg	Dear Idaho D.O.T., – I believe that the best alternative for the highway is W-4. From my understanding, the current road is very dangerous. W-4 is a great alternative because it has less curves than US-95. Also, the E-2 route is a bad idea because it destroys the last original Palouse. I think that putting a road through the Palouse Prairie will also cause a lot of conflict and will damage the meaning of the beautiful scenery of the Palouse area. Please don't get rid of the Palouse I know. – Respectfully, Emma Gregg	The E-2 Alternative would not destroy or directly affect any Palouse prairie remnants including the Paradise Ridge but would be closer to Paradise Ridge remnant than the other alternatives. See General Response Weeds and Wildlife for a description of the alternatives' indirect impacts to vegetation and Paradise Ridge.
L-53	Steven	Peterson	to who it may concern Idaho D.O.T. – I respectfully appreciate the safety concerns of the drivers on the road, but in order to do that you have to cut through most of the Palouse prairy that we have little of. So please for the prairie use W4 although its longer please don't cut through the prairies. – Respectfully,	The E-2 Alternative would go over Paradise Ridge but would be located along its base. The E-2 Alternative would not destroy or directly affect any Palouse prairie remnants but would be closer to Paradise Ridge remnant than the other alternatives. See General Response Weeds and Wildlife for a description of the alternatives' indirect impacts to vegetation and Paradise Ridge.

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			Steven Peterson	
L-54	Sebastian	M.	After reading your pamphlet about Highway 95. It seems extremely clear you want the encouragement of road C-3. Though a lot of benefits, along with some drawbacks were listed, are there any more possible drawbacks? If so, there must be more benefits to road E-2. If it's alright, would you please include more information? – Respectfully, Sebastian M.	ITD has identified the E-2 Alternative as their Preferred Alternative. See General Response Alternative. The FEIS has updated and new information regarding the effects of the Alternatives on wildlife, safety, vegetation and hydrology.
L-55	Daniel	Orfe	Dear I.D.T., I'm a student from Garfield Middle School. I think you should go with the C-3 highway alternative. It uses less land, and costs about the same as E-2. E-2 would cause 5 residences to be destroyed. If you were to go with the E-2 alternative you would destroy 4 acres of ungulate land and that would create more ungulate-car accidents. Also C-3 affects the least amount of wildlife. – Respectfully, Daniel Orfe	See General Response Displacement-1 and Displacement-2 for clarification of residential and business impacts. See General Response Safety-2 regarding how wildlife collisions are considered in the safety analysis. General Response Wildlife discusses the alternatives' impacts to wildlife on Paradise Ridge. Mitigation for wildlife such as wildlife crossing at county road underpasses and designing culverts to pass small terrestrial species and vegetation removal in the clear zone are described in the FEIS Chapter 9, Environmental Commitments.
L-56	Evan	–	Dear Idaho DOT, I think you should use C-3 route because it takes up the least amount of farmland and requires the least amount of new right-of-way. C-3 seems like a good route because it is the most direct and straight. – Respectfully,	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. In comparison to C-3, the E-2 alternative would be the most direct with the least curvature.

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			Evan	
L-57	Levi	–	Dear IDT, I believe that C-3 would be the best for a lot of people because it would dehome less people and wouldn't have very many interruptions in the process of making it. Also, as your packet said, the risk of driving is lower. Respectfully, Levi	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. See General Response Displacement-1 and Displacement-2 for detail regarding residential and business impacts. Additional clarification is also in the FEIS Section 4.1. The E-2 Alternative would have the greatest safety benefit of all of the action alternatives, resulting in 9 fewer predicted fatal and injuries over the 20 year design period.
L-58	David P	Couch	Feb. 19, 2013 – US 95 Thorncreek to Moscow Project PO Box 7129 Boise, ID 83707-1129 – To Whom it May Concern: – Although I was unable to attend the January 23rd Thorncreek to Moscow DEIS public hearing, I would like to register my support for the E-2 (preferred) alignment. I believe the E-2 alignment will be the safest of the four alternatives being considered because it is the shortest route with the least amount of access points. Additionally, I believe it	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3. General Responses Weather-3, Weather-4 and Weather-5 discuss the relative differences in ice, fog, snow and slope exposure between alternatives. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			will be the least susceptible to icy, slick road conditions as it will be above most ground fog conditions and would have the best exposure to the winter sun. – Since I have a family and friends that routinely drive the route between Lewiston and Moscow, I encourage ITD to proceed with the construction of this section of US-95 (preferably the E-2 alternative) as quickly as possible. Thanks for the opportunity to comment. – David P. Couch, PE 2133 11th St. Lewiston, ID 83501	
L-59	David	Stowers	February 23, 2013 – Adam Rush Public Involvement Coordinator Idaho Transportation Department Box 7129 Boise, Idaho 83707-1179 – ATTN: Project number DHP-NH-4110-Key#: 9294-Thorn Creek – Dear Mr. Rush, – It is my opinion that the Thorn Creek Road project is long overdue. There have been far too many accidents, deaths and property damage on the old road. Also because of the 10 year delay, the taxpayers must spend millions more to build the	General Response Schedule describes the next steps in the environmental process and the anticipated schedule. Filing additional lawsuits would not be expected to change the course of the project implementation. Rather, FHWA and ITD intend to comply with NEPA regulations. See General Response NEPA and Schedule for a description of the next steps in the environmental process and the anticipated schedule. See General Response Safety-5 regarding Reisenauer Hill.

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			new Paradise Ridge Road which is the project that needs to be done now! – I am at the point where I feel that someone or group needs to sue the Paradise Ridge Coalition. I feel the State Transportation Department needs to immediately get the project going and no more delays. See the attached article about the constant accidents on Reisenauer Hill to prove the point. All the students at the University of Idaho and the hundreds of commuters deserve a new road now.	

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Slick road blamed for two accidents

MOSCOW — Two related accidents near the top of Reisenauer Hill on U.S. Highway 95 south of Moscow injured one person and closed the roadway for two hours.

According to Idaho State Police accident reports, the first crash happened at 5:21 p.m. Thursday when a southbound 1994 Saturn sedan driven by Brian Smith of Moscow lost control on icy roads. The vehicle crossed the center line, left the northbound shoulder and rolled one time into the bottom of the ditch.

Medics transported Smith to Gritman Medical Center in Moscow with unspecified injuries. Two passengers, including a 4-year-old boy, were uninjured, according to the state police.

The second accident occurred seven minutes later as traffic slowed for the earlier accident. A 2006 Chevrolet HHR driven by Christopher Clawson of Boise began to slide as he attempted to slow down, and he maneuvered the vehicle toward the right shoulder. But a 1995 Saturn sedan driven by Petra Klander of Uniontown slid into the rear of Clawson's vehicle, causing Clawson to slide off the shoulder.

Klander's vehicle slid into the northbound lane and came to rest near the fog line, blocking traffic. Neither Klander nor Clawson were injured.

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			Sincerely, – David Stowers 913 Warner Avenue Lewiston, Idaho 83501 ettamae49@yahoo.com – – – Date 2/21/13	
L-60	Sherman and Janice	Clyde	Sherman & Janice Clyde 2940 Clyde Road Moscow Idaho We support E2 it is the safest route plus the fewest accesses We have lived along highway 95 for over 48 years It is dangerous trying to get on the highway. We have seen a lot of accidents and deaths on the highway where we live C-3 will make it more dangerous. Having to cross two lanes + turn lane to get on highway We support E2 Sherman Clyde Janice Clyde	The Safety Analysis has been revised since the DEIS was published but the findings regarding the relative safety between alternatives remained valid. See General Response Safety-3.
L-61	Norm	Metzker	Dear Sir: l am writing in regards to the Thorn Creek to Moscow road project. At the meeting on Jan. 23 -- 2013 l spoke of W 4 or C 3. Im sorry. Now I have had a better chance to study the alternative. For a vote it Appears that E 2 is the best rout. I am also in favor of a North -South bypass Rout on	General Response Alternative explains why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. FHWA and ITD consider the alternatives' consistency with the local land use and transportation plans. See the FEIS Section 4.2 regarding clarification of the Ring Road concept and regional transportation plans. General Response Schedule describes the next steps in

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			the West side. This needs to be planed for before To much home or business Construction. I have lived in Latah County for over 50 years and have long sense Hoped fore many road improvement projects. And this is one of them. Thank you for listening. Norm Metzker 2709 Granville St. Moscow, Id. 83843	the environmental process and the anticipated schedule.
L-62	Mrs. (Marilyn)	Ole Johnson Jr.	February 5, 2013 – Dear ITD As a property and business owner along the current US Hwy 95 corridor, I am in favor of the E2 routing of the highway. The current highway has many safety issues, paramount of those are the many county roads, driveways and business entrances. I counted 14 businesses between the Primeland site and Johnson Excavating. Four of those businesses are on my property. One of those businesses (Johnson Excavating) has slow moving heavy equipment entering the highway numerous times a day. The Latah County Motor Pool shop is also located there with the sheriffs' department coming in and out many times a day. Green Acres RV Parking has slow moving motor homes looking for a place to park overnight and Don's Plumbing office and dispatch are located on my property. I also have a spring on my property that supplies water to the businesses and any excavating for the central route could easily impact that resource. There are 8 businesses and 7 homes that would be displaced	Thank you for your detailed information regarding access and traffic along existing US-95. The C-3 Alternative is not expected to affect the spring on your property as explained in General Response Water. The C-3 Alternative is in nearly the same location as existing US-95 is and cuts and fills are expected to be minor in that location. If shallow groundwater is encountered in the vicinity of the spring by construction, the embankment and ballast will be designed to drain water through them so that flow will continue. Additional clarification of residential and business impacts is provided in General Response Displacement-1. Should an action alternative be selected, then the existing US-95 may be turned over to Latah County Highway District; however, it is undetermined at this time if the speed limit would be lowered. See General Response Maintenance-2. See General Response Safety-3 regarding how the safety on the existing US-95 would be considered in the Safety Analysis. In response to public comment, ITD has provided additional detail in the FEIS regarding the indirect and cumulative effects to Paradise Ridge and Palouse

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			should C3 be chosen as well as the water supplies. The two trailer courts (Hidden Village & Valhalla) along this stretch of road also generate a significant amount of traffic entering the highway as well as the many driveways to homes and county roads. By moving the highway to the east IDT can control the access to the highway thus making for a much safer commute. The current highway would then be part of the Latah County Highway district and I would imagine that they would reduce the speed limit thus making the section of road safer. I have been closely following the rhetoric of the opposition to the E2 routing and find it interesting that they wish to maintain Paradise Ridge as a somewhat pristine environment. The area has already been impacted with extensive development. Paradise Ridge is ALL private property not a public recreation area, with over 50 homes, radio and TV towers, and a commercial riding arena and other endeavors. A look at a county map shows that much of the ridge is divided up in what one day may well be more development. So much for pristine. This very vocal group of opposition to E2 appears to be some of same folks that caused the stink about the megaloads. Most do not even live in the corridor. It is time that the project get moving so that no more lives are lost and that the least number of homes and business are impacted. I am a Latah County native and E2 is long overdue. Sincerely,	remnants including additional details regarding the ecological effects due to past, present and foreseeable future commercial and private development. See General Response Weeds and Wildlife. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

#	First Name	Name	Comment	Response
			Mrs. Ole Johnson, Jr. (Marilyn) 2921 Cameron Road, Moscow, Idaho 83843	
L-63	Henrianne	Westherg	3-19-13 – Idaho Transportation Dept 3311 W. State PO Box 7129 Boise, Id 83707-1129 – Dear Project Committee, I am writing to you in opposition to the E-2 option for the road work to be done on Hwy 95 south of Moscow. This is not the safest route, or the most cost effective. It makes more sense to relocate closer to the stateline with connection to the larger populated areas of Moscow & Pullman. This section of deadly highway needs immediate attention, and deserves a roadway that will avoid the high hill dangers and displacement of homeowners concerns. Please do the right thing and build the new road west for the best possible outcome for everyone. – Thank you, Henrianne Westherg 5118 Lenville Rd., Moscow, ID 83843	FHWA and ITD must balance the alternatives' impacts to both the human and natural environment while taking into account the public's need for a safe and efficient transportation system. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative. The E-2 Alternative would result in the greatest safety benefit. See General Response Safety-3 and Safety-6. It would also be the most cost effective action alternative. See FEIS Chapter 8, Construction Phasing and Funding. The route for realignment that you mentioned may be similar to the western alternatives, which were evaluated early in the scoping process. See DEIS and FEIS Chapter 2, Alternatives. See General Response Safety-5 regarding Reisenauer Hill. See General Response Displacement-1 for clarification of impacts to residences and businesses.
L-64	Kevin City of Lewiston	Poole	March 5, 2013 Mr. Kenneth G. Helm, District Transportation Planner Senior ldaho Transportation Department PO Box 837 Lewiston, ID 83501	ITD recognizes the urgency to improve this stretch of US-95 but intends to fully comply with the environmental process and funding requirements. General Response NEPA and Schedule describe the NEPA process, the next steps in the environmental process and the anticipated schedule.

#	First Name	Name	Comment	Response
			– RE: Project No. DHP-NH-4110(156); Key No. 09294 Comment Period Extension for the Draft Environmental Impact Statement (DEIS), Thorncreek Road to Moscow – Dear Mr. Helm: The City of Lewiston strongly supports the preferred alternative identified as E2 in the DEIS for the US-95 Thorncreek Road to Moscow project. This project has long been needed to address the dangerous conditions on US Highway 95 from Thorncreek Road north to the Moscow city limits that have caused numerous fatalities and injuries to motorists utilizing this section of highway. Approximately 6,100 vehicles travel this route each day and the current conditions have resulted in eight accident-related deaths and 207 accident-related injuries since 1997. This highway is the only full length north-south transportation corridor for the State of Idaho and the perilous conditions of this stretch of highway pose significant dangers to users. These comments are not intended to encourage Federal or State of Idaho regulatory agencies to lessen regulatory oversight and/or take shortcuts in the approval process, but instead, urge them to prioritize review processes and to appropriate funds so that these much-needed improvements can be made as soon as possible. Mayor Kevin Poole Cc: Lewiston City Council, City Manager Jim Bennett	

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L-65	Paradise Ridge Defense Coalition	–	*Please see attached petition (75 pages)*	See Response to L-39
L-66	Christina	Baldwin	Feb 20, 2013 – Adam Rush ITD Public Involvement Coordinator PO Box 7129 Boise, ID 83707-1129, – Dear Mr. Rush, I would like you to support C-3 Alternative on US 95 south of Moscow, Idaho. Much has been said about E-2 Alternative being safer. This is not a true statement. 1. There is sufficient evidence to indicate a driver's speed is a positive correlate to being in a crash. The speed limit for all routes will rise to 65 mph, therefore, E-2 will not be any safer than the other alternatives in this regard. 2. In collisions between two vehicles of different mass, the occupants of the lighter vehicle are considerably worse off than those in the heavier vehicles. This factor plus increased speeds will not make E-2 any safer than the other alternatives in this regard. 3. It is true that the number of accidents increases when cars are getting on or off a highway. On page 26 of the DEIS report, it states that there were 22 accidents in less than 7 miles at access points in the 10 year period from 2002-2011. It is true that C-3 as	The Safety Analysis has been revised since the DEIS was published but the relative findings remain valid. The E-2 Alternative would, still offer the greatest safety benefit as explained in General Response Safety-3. See General Response Safety-6 regarding the significance of the difference in safety between alternatives. The numbered responses below correspond to the numbers in your comment letter. 1. See General Response Safety-4 regarding speed limits and safety. 2. While the respective weights of two impacting vehicles may be a safety factor, it is not possible to predict the combinations of vehicles that could impact each other. Percentages of heavy trucks and passenger vehicles that are used in the safety analysis are the same between alternatives so are not a primary factor in the safety when comparing alternatives. 3. See General Response Safety-1 regarding the consideration of frontage roads for the C-3 Alternative. Additional clarification regarding access was added to the FEIS and is described in General Response Access. Accesses to and from US-95 were minimized for all the alternatives through use of consolidated approaches and limited access points. Access will also be further evaluated when there is a greater level of detail during the design process. Steak House Hill is outside of the logical termini and is not addressed in this EIS process.

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			planned has more points for local access than E-2 (47 versus 22 respectively, pg. 53 DEIS) So, it seems obvious that reducing the number of access points and/or the actual design of the access points will improve safety on C-3. In other states and areas and indeed on US 95 at Viola (8 miles north of Moscow), access ramps are designed in such a way that traffic coming onto the highway or off has a separate lane. It is also curious that this is now an argument when nothing was done to change the number of access point on the US 95 "remodel" over Steak House Hill a few years ago or up near the Casino south of Coeur d'Alene 4. Much has been said about E-2 avoiding Reisenauer Hill and, therefore will be safer. I do not believe this is an accurate statement. Both E-2 and C-3 go over Reisenauer Hill and both will meet Federal Safety Standards. It will people who drive unsafely that will make the statistics. 5. The elevation of the E-2 Alternative definitely makes it less safe. I live on Moscow Mt. at about the same altitude as E-2. We have heavy fog hang over us when there is no fog 200-300 ft. lower. On Feb. 19, we hit a wall of fog crossing Steak House Hill that slowed traffic to 35 mph. The snow was also sticking. It was not falling at the bottom of Steak House Hill. This is quite common. For this reason alone, I believe it is inaccurate to say that E-2 is safer. It will also cost more for snow removal and the spreading of material to increase traction. 6. According to the DEIS (page 177) "The C-3 Alternative would provide the most convenient	4. All three action alternatives would be much safer than the existing highway at Reisenauer Hill and are predicted to have the same number of crashes per mile of divided four-lane highway. See General Response Safety-5 regarding Reisenauer Hill. 5. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, fog, snow and other weather conditions. The E-2 Alternative would be located at substantially lower elevation than Moscow Mountain. See General Response Maintenance-1 regarding winter maintenance. 6. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). General Response Access provides updated information regarding Access Control for the action alternatives. Regarding protection of Paradise Ridge, ITD understands the scenic beauty of the area. The E-2 Alternative would not go over or through Paradise Ridge but would be closer to it. Paradise Ridge is all privately owned properties with no public access. It has over 50 commercial and residential developments on it, ITD has no control over future developments that could directly impact Palouse Prairie remnants. While ITD does not have control over its protection, the E-2 Alternative, should it be selected, would restrict any new access onto US-95 which could reduce development pressures. See General Response Wildlife regarding the alternatives' effects to Paradise Ridge. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. For clarification, The US

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			access and best emergency response times to the population on the existing US-95, while the E-2 and W-4 alternatives would provide improved access and quicker response times to some of the more outlying areas and cities. The C-3 Alternative would have a longer four-lane with center turn lane section that would allow for easier access and more frequent opportunities to turn around in the urban areas." A few weeks ago when the Palouse was all covered with snow, I hiked around Kamiak Butte. From one area on the ridge, one can see a beautiful panorama including Steptoe Butte, Moscow Mt and Paradise Ridge. Only snippets of US-95 and SR 27 are visible from any of these ridges. Steptoe and Kamiak are parks and Moscow Mt. is sort of "protected" by the lumber companies. Paradise Ridge is appropriately named. It was a beautiful. The Idaho Fish and Game, the Environmental Protection Agency, the Palouse Prairie Foundation, the Army Corps of Engineers, and the US Fish and Wildlife support C-3 over E-2. I hope you agree and support the C-3 Alternative. I look forward to hearing from you. Thank you. Christina Baldwin 1372 Four Mile Rd., Viola, ID 83872 208-882-6215	Army Corps of Engineers has not chosen a preferred alternative at this time. Paradise Ridge is currently privately owned and has no special protection. Landowners are free to develop their land on the ridge at any time according to local regulations.
L-67	Stephan	Flint	Stephan Flint 4961 Lenville Rd, Moscow ID 83843 February 18, 2013 –	The comment period was extended to March 25, 2013. Safety See General Responses Safety-2 regarding how wildlife collisions were factored in the Safety Analysis.

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			Adam Rush ITD Public Involvement Coordinator PO Box 7129 3311 W. State St Boise, ID 83707-1129 – Dear Mr. Rush, Thank you for the opportunity to comment on the US 95 Thorn Creek to Moscow DEIS. It appears to me that the DEIS does not use a logical process to select an action alternative. I will review each of the potential issues, using data from the DEIS to reach a conclusion, and will comment on missing data critical to some of the decisions. As there appears to be little support for W4, I will concentrate on the comparison of C3 and E2. As I suggested at the public hearing, and in the written copy of my remarks submitted that evening, I believe this analysis is suitable for a Supplemental EIS. Given the length of the DEIS and the supporting documents (estimated at over 1,300 pages), the inconsistencies between documents, the general lack of cross-referencing and updating in the documents (some were written seven years ago), I am disappointed that ITD and FHWA did not grant the requested extension of the comment period. While I can appreciate the difficulty in cross--referencing and updating this large amount of material, I can also construe this lack of cross-referencing as an intentional device to impair informed public comment. I cite examples of these	See Safety-6 regarding the significance of the differences between the length and safety between alternatives. See General Response Safety-3 regarding how the existing US-95 was factored into the revised Safety Analysis. The E-2 Alternative would still have the greatest safety benefit. General Response Agencies explains why there were differences in opinion regarding FHWA's and ITD's Preferred Alternative. General Responses Weather-3, Weather-4, Weather-5 and Weather-6 discuss the relative differences in temperature, ice, snow, fog, and wind between alternatives. See Weather-2 regarding the referenced five-month data set and how it relates to the larger 30+-year data set. General Response Weather-1 discusses how the C-3 Alternative was presented and considered in the Weather Analysis. The Weather Analysis was revised and the relevant weather data is included in the revised report. See General Response Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. See General Response Weather-8 regarding how the findings in the Weather Analysis are considered in the Safety Analyses. Since publication of the DEIS, the Weather and Safety Analyses have been revised and the data and findings for the respective reports are contained within the respective reports and a link is not used. Even when considering the projected wildlife collisions, the existing US-95 deficiencies and the weather conditions, the E-2 Alternative would offer the

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			problems in my letter. As stated in the DEIS introduction, p 24, the project purpose and need is to increase highway capacity and safety. As all action alternatives will increase highway capacity and there appears to be no discussion about capacity differences between alternatives, I will focus much of my discussion on safety. My detailed comments are on the following six pages. Thank you for your consideration of these comments. – Stephan Flint Cc: EPA Region 10 EPA Boise office -- Department of Fish and Game, Lewiston US Fish & Wildlife Service, Boise Scott Reed, Attorney – Safety The "Screening of Alternatives" document states "There were only slight differences in the anticipated crash rates for the proposed new alignments". This is about the only point on which I agree with the safety analysis as it states that any of the three potential new alignments will be a vast safety improvement over the present route. What needs to be analyzed now are the assumptions and computations for the smaller differences between the proposed alignments. Despite this above statement about the similarity of potential accident rates of the different alignments,	greatest safety improvement. Residential and Business Impacts See General Response Displacement-1 and Displacement-2 regarding differences in residential and business impacts. Farmland The statement regarding the E-2 Alternative having slightly more impact to Prime farmland was corrected to state that it had more impacts than the other Action Alternatives then references the table of Farmland Effects. This sentence was not meant to obscure the impacts but to state a relative comparison. Table 42 of the DEIS clearly presented all of the acreages of impacts. See FEIS Section 4.3. The C-3 Alternative would score lower on the impact rating form because of the three alternatives it would more closely follow the existing right-of-way and would require the least amount of productive farmland to be converted. The other alternatives would require that more acres be converted to right-of-way for transportation use. See the DEIS Table 42 on page 145. Additional clarification of how both the Farmland Rating scores and farmland acreages were considered has been added to the FEIS Section 3.3 and 4.3. The language in the FEIS is not meant to be deceptive, nor was the organization meant to prevent cross-referencing. The technical reports that were used for the DEIS were each described in the methodology sections in Chapter 3 of the DEIS for each respective section to prevent having to reference back to the reports excessively since most of the information came from the reports. The sources for the information in

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			a small difference between C3 and E2 is frequently cited as the reason for the selection of E2. See the DEIS (pages 15, 16, 55, and 178) and the Safety Technical Report (p. 15) for examples of where this small difference in projected accident numbers is invoked as the reason for selecting E2. Specifically, p 15 of the Executive Summary states that a major reason for selecting the E2 alternative is that it "has the greatest safety improvement compared to the other Action Alternatives". The ITD safety analysis for E2 is based primarily on the number of access points (driveways and crossroads) but ignores potential accidents caused by increased big game and more severe weather on E2, and accidents on Old 95 involving local traffic which is unable to access E2. (It appears local traffic cannot access the new alignment except where it connects with Old 95. This effectively restricts nearly all local traffic to Old 95.) I discuss these factors in detail below. Corridor accident analysis: Considerable local traffic will still use "Old 95" if E2 is built. What is most appropriate for route selection is the number of accidents in the "US 95 corridor" rather than just on the proposed new construction. Using ITD's own figures (Appendix C.4 of the Safety Technical Report), nearly one quarter of the traffic in and out of Moscow will use Old 95, and even Reisenauer Hill will still have 10% of its present traffic if the E2 route is built. While there will likely be less collisions between vehicles on Old 95, there will still be run-off-the-road accidents. Except for the intersections with Old 95 (Table 6 on p. 11 of Safety	the FEIS have been further clarified throughout the FEIS. Wetlands, streams, and floodplains There are no individual reports for riparian areas or tributary impacts The discussion of riparian and tributary function is included in the wetland delineation report. Additional detail regarding tributary impacts has been added to the FEIS Section 4.7. Following the DEIS publication, a Hydrogeologic Technical Report was prepared and is summarized in the FEIS Section 3.7 and 4.7. Vegetation The E-2 Alternative would not involve any clearing of Palouse remnants. Indirect effect due to weeds and the alternatives' effect to wildlife near Paradise Ridge are discussed in General Responses Weeds and Wildlife. Staging areas, haul roads, batch plants, material sources are described in the DEIS and FEIS Chapter 8, Construction Phasing and Funding. These sites will be determined during the design process. Contractors will not be permitted to stage, stockpile, waste or otherwise disturb any Palouse remnants or environmentally sensitive areas during construction. Mitigation measures for impacts to the human and natural resources are described in FEIS Chapter 9, Environmental Commitments. Additional information regarding avoidance, minimization and compensatory mitigations to wetlands and waters of the US are provided in the FEIS Section 4.6, under Executive Order 11990. Visual Quality The impacts are based on intersects of the conceptual

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			Analysis), the accident analysis for E2 ignores all accidents on Old 95. Alignment C3 replaces portions of the Old 95 roadway and permits much of the local traffic to use the new road. With C3, there will be minimal traffic on what is left of Old 95. Using ITD's average daily traffic (ADT) values for Old 95, lengths of roadway segments, and being very conservative by only considering run-off-the¬ road accidents, I calculate an accident rate for the US 95 corridor under the E2 alternative that is about 20% higher than ITD's value for E2 alone. Corridor analysis/big game: Also increasing the accident rate for E2, as compared to C3, will be collisions with big game. There is no doubt there will be more big game crossing E2 than C3 -a professional consultant suggested underpasses for big game on E2, but the ITD does not include this in their proposal. The natural resource agencies (IDF&G, EPA, USF&WS) all prefer C3 to E2 (p16 of DEIS, Executive Summary) because of the presence of big game (see map on p. 35 of Melquist big game biological evaluation in Wildlife Technical reports}. When considering the corridor accident rate, adding in only a small factor for additional animal-caused crashes on E2 raises its accident number to approximately that of C3. Corridor analysis/weather: Many believe the weather will be more severe - more snowpacked icy conditions and fog - on E2. Much anecdotal data support this. However, ITD only conducted their weather measurements for 5 months during an exceedingly mild, snow-free winter. Stations were	level alignments. No specific information on cuts, fills, geotechnical information or survey data is available to determine slopes, cuts and fills at this time. That information will be available during the design process. At that time ITD will explore engineering solutions to further minimize harm to those resources. Travel Time Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). Speed limits and safety are addressed in General Response Safety-4. Miscellaneous The mailing address for EPA is corrected in the FEIS Appendix 3. The requirement under FHWA NEPA regulations is that EPA's Regional Office be provided a copy of the DEIS. EPA received the DEIS and provided comments through mail and a copy was also hand delivered. Listings and cross-references to the technical reports have been clarified in the FEIS. A Revised Safety Analysis (ITD 2013) was prepared to address DEIS public comments. It contains all of the relevant supporting data and is available at public viewing locations. The DEIS discloses the alternatives' impacts to the human and natural environment and is not meant to be biased. The text referred to on page 15 of the DEIS is describing the primary advantages and disadvantages. The description of the primary disadvantages is not an all-inclusive list but summarizes resources for which the E-2 Alternative would have the

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			not positioned to compare the central alternatives with others; hence C3 is considered equivalent to E2 in fog when they are likely different. The weather study measured wind but no wind data are presented. Residents are familiar with high winds which would be hazardous to high-profile vehicles and are likely higher on E2 than C3, but this question cannot be answered because adequate data were not collected, despite nearly 10 years in which this could have been done. The study states that measurements are ongoing and provides a link to weather data, but the link does not work. Considering the corridor accident rate with the above addition of a factor for big-game-caused accidents, and now adding anything for additional increased weather-related accidents on E2, E2 becomes less safe than C3. 2007 request for reanalysis: It appears that in Nov 2007 the FHWA instructed ITD to "integrate an analysis of wildlife/vehicle collisions and climate effects into the safety evaluation prepared for the project". This information is on a single page (p. 7) near the end of the Safety Technical report in Thorncreek Road to Moscow Environmental Matrix Safety Analysis Alignments Carried Forward and is titled "Climate and Wildlife Safety Analysis". Discussion of these two factors in this analysis on this page is minimal: The weather analysis in this 2007 document focuses mostly on the effect of curve radius and does not consider any possible differences in weather between the alignments.	greatest impacts. Since the W-4 Alternative would have greater impacts than the E-2 Alternative, greatest wetland impacts was included under the W-4 Alternative's primary disadvantages. In addition, it was noted under the C-3 Alternative that C-3 would have the least wetland impact. –

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			Wildlife is dismissed in this 2007 document with even less discussion. It does admit E2 would be the least safe from the perspective of wildlife-caused accidents, however it uses the low number of animal-caused accidents on the existing alignment to downplay this problem. The E2 route is clearly in better big game habitat. As many big game collisions occur under poor light conditions, attempted mitigation such as the proposed clear zones will not prevent accidents. This integrated analysis of climate and wildlife is supposed to be available in its entirety on the ITD project website. The last sentence of the first paragraph states, "To review the assessments in full, go to the ITD project website." I was unable to locate this information on the project website as a stand-alone object. It may have been included in the safety analysis which is dated 2012. If so, the discussion is inadequate. The big game discussion focuses on how few big game related accidents are on the existing road, how bad things are at locations outside the project area, and the effect of clearing vegetation. There is no real attempt to quantify what the situation might be like on E2. We are left with anecdotal information from area residents which suggests big game routinely forage on portions of the E2 right-of-way and adjacent areas. The weather discussion is simply a repetition of what is stated elsewhere. Conclusion: If accidents are calculated for the US 95 corridor (Old 95 and the new alignments), and weather and big game are taken into consideration,	

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			E2 would likely be less safe than C3. Residential and business displacements In my comments at the public hearing (these comments were also submitted in writing that evening), I mentioned inconsistencies in the data between documents, making quantitative comparisons between alternatives difficult. Example: Alternative C3 displaces 7 residences in Table 8 of the DEIS but only 3 in the Screening of Alternatives document (p. 17). I have now learned that ITD personnel, in conversations at the open house and on a subsequent date, have corrected these estimates to only one residence (and no businesses) if C3 is built, but a number of residences would be displaced along Eid Road if E2 is built. (See Feb 13 letter from Forbes for details.) This is substantially different than presented to the public during the comment period and has likely prejudiced people against the C3 alignment. This is a serious issue that should be rectified in a Supplemental EIS. If the information from these conversations at the open house and later are correct, C3 clearly is the alignment that would minimize the disruption of households. Farmland The DEIS and supporting documents contains deceptive descriptions of the affected environment which makes it difficult to accurately assess how the impacts of the different alternatives were compared. Example: The discussion of farmland in the "Selection of Alternatives" document uses the "prime farmland impact rating" as a method of	

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			rating the alternatives. While this derived number is required when farmland is converted to other uses, it appears to be a relative rating, comparing the quality of the impacted farmland. As the 3 alternatives are somewhat similar in this rating, acreage (which differs with E2 being greater than C3 by a factor of 2 for prime farmland) is a more appropriate factor on which to base a selection. However, it is not used in the selection process. The DEIS (p147) states that E2 would affect "slightly more prime farmland than the other Action Alternatives." While the absolute acreage is not large compared to the size of many Palouse farms, E2 actually destroys 50.8 acres of prime farmland while C3 only covers 25. This is an example of qualitative wording being used to obscure impacts. The C3 alternative would split fewer farms (4) than E2 (6) and result in fewer "remnant farms" of less than 20 acres (2 for C3, 5 for E2). (From Community Impacts pdf, Community Impact Assessment Ch 3 Land Use Plans and Policies, p.15) Clearly, using the criteria of farmland preservation and farm integrity, alignment C3 is the logical choice. Wetlands, streams, and floodplains The DEIS shows E2 clearly eliminates more wetlands than C3, but C3 is said to impact more stream channels and one floodplain. As is common in the document, there is no cross¬-referencing from the DEIS (Chapter 4 in this case) to the data reports, creating an obstacle to the evaluation of issues. Wetland data are readily available in the Wetland	

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			report, but where would one look for a tabulation of stream (tributary) data for different locations? I do not find a detailed tabulation in the wetland report, and is not in the floodplain report. There is one map in the DEIS (Exhibit 26) and four in the wetland report (Appendix A) which show the tributaries and one can then estimate their lengths from the map. Table 44 gives overall lengths. What I have been unable to locate are specifics of where in the project specified lengths of streams would be impacted and how. Riparian habitat is important, yet the DEIS index contains neither "riparian", "stream", "waterways" nor "tributaries". Is fill being placed into riparian areas or just nearby? Could the alignment be moved into the hillside to avoid the stream? As the streams paralleling the road are primarily along the existing alignment, have these streams already been compromised or otherwise impacted? Or are these decisions being postponed to the final design phase? This lack of information makes it impossible to compare the overall severity of the different alignments' impacts on waterways. There is a floodplain impact in C3, but it appears minor from the discussion in the DEIS. Vegetation The C3 alternative has smaller maximum heights of cuts and fills (for C3, the maximum cut height is 61% less than in E2, and the maximum fill height is 40% less) and thus C3 requires less total excavation (26% less) than E2. This provides less disturbed ground in C3. Disturbed ground is prime habitat for invasive and noxious weeds. (Cut, fill and	

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			excavation data from the Community Impacts pdf, Environmental Justice section, Fig 2 (it's really a table). Given that ITD may clear "330' from the edge of traveled way" to permit big game to be seen along E2 (p. 7 Safety Analysis), the disturbance footprint of E2 is truly massive. It may nearly intrude into adjacent prairie remnants. Certainly it will put greater invasive weed pressure on the large and remarkably undisturbed prairie remnant atop the south end of Paradise Ridge. (As this remnant is on private land, few have had the privilege of visiting it, hence the impression among some supporters of E2 that “weeds are everywhere" and thus they proclaim the weed situation hopeless.) I have not seen any discussion of staging areas, haul roads, batch plants, gravel or fill sources and rubble pile locations. These can all have impacts, both in terms of possible direct impacts to prairie remnants (especially if they are left to the discretion of unsupervised contractors) and in terms of additional disturbed ground susceptible to invasive weeds. These areas need to be specified in the DEIS, not left to the design phase. Similarly, unspecified plans for "future mitigation" have no accountability. Visual quality There appears to be no disagreement on this; E2 clearly will have a greater visual impact and, along a substantial portion of the route, the roadway will appear to dominate the landscape. Travel time/distance I view the travel time/distance differences between	

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			C3 and E2 to be trivial; if these parameters are so important on US 95, then I suggest activity outside the project area could produce meaningful time and distance savings--the Tolo Lake road avoiding Grangeville would be very effective in saving time and distance if it was paved and straightened. There is a second way to view this travel-time issue. The faster travel time on E2 comes from not having to slow down as one approaches the commercial area south of Moscow. The E2 route would put drivers into Moscow at a higher rate of speed than C3. The road from the northern terminus of the project into Moscow is relatively open and uncongested and it is difficult for drivers to decrease their speed to the posted 35 mph and then to 25 mph. I have personally observed this when I volunteered as a crossing guard at Palouse Prairie School (where Styner crosses US 95). Excessive speed is so common here for drivers approaching from the south that I have seen police simply waving at drivers to slow down rather than practicing any active enforcement. Consider that this problem occurs for drivers after they have been driving through an area signed at a reduced speed (past JJ Building, Primeland etc.). What would happen if they entered town by the South Fork Palouse River bridge on E2 at 65 mph? Conclusion It is clear from the information I have discussed that there is no question alignment C3 is preferable from the standpoints of visual quality, farmland preservation, residential and business	

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			displacement, and effects on vegetation and wildlife. From the perspective of wetland preservation, C3 is preferable but there is insufficient information in the documents to make an informed decision on the combined wetland/stream/floodplain impacts of these alignments. I argue that the safety of C3 will be equal to or better than E2 and that the travel time/distance issue is trivial and higher speeds as the alignment reaches the South Fork Palouse River bridge will result in unsafe conditions on US 95 as drivers enter the south end of Moscow. I have really been unable to find any true arguments supporting E2 over C3. Miscellaneous: DEIS, list of agencies: The mailing address for Carla Fromm in the Boise EPA office is incorrect. As I understand it, EPA has not been at the Orchard Street location for many years. Do we know whether Carla Fromm received any of the necessary documents during the EIS process? Biological Assessment: On p.6 there is a discussion of negotiating an easement to protect Spalding catchfly and its reintroduction to a private prairie remnant. This work was scheduled for 2007 and 2008. What is the current status? Also, what are the results of the 2007 and 2009 surveys (p.8)? Another example showing the difficulty in locating information in these documents: The IDF&G wildlife assessment is cited in the Executive Summary and in Chapter 1, but no location is given. The Wildlife	

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			Technical Reports was a logical location, but there is no table of contents in this document. There are 4 reports by 3 different subcontractors plus the IDF&G wildlife assessment in this document. Only one of the five reports has a header, so one must literally page through the entire document to even determine whether the IDF&G wildlife assessment is present there. The DEIS has a table of contents for this document, but it is logical one would look at the document itself for a table of contents. The table of contents in the DEIS lists the reports in the incorrect order, so is of little use. The DEIS p15 states that E2 would traverse flatter topography than other alignments (which is one factor that makes it preferred by ITD), but I was unable to find any quantification of this. I can see where the western route traverses rough topography, but could this be a trivial numerical difference between E2 and C3? Writing in the DEIS is biased as it will ignore negative aspects of the preferred alternative yet call out similar problems in one of the other alternatives. For example, the Executive Summary (p.15) points out the length of tributaries affected by C3, yet makes no mention of the acres of wetland obliterated by E2. –	
L-68	Green Sanctuary Committee of the Unitarian-Universalist Church of the	–	Comment about the ITD's Proposed Highway 95-Reroute between Thorncreek Road and South Moscow – March 5, 2013	FHWA and ITD must balance both the human and natural environmental impacts with the safety benefit for the general public. General Response Alternative describes why FHWA and ITD identified the E-2 Alternative as the Preferred Alternative.

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	Plaouse (signed by 5)		Green Sanctuary Committee Unitarian-Universalist Church of the Palouse P.O. Box 9342 Moscow, ID 83843 Dear Mr. Rush, ITD Public Involvement Coordinator: The ITD's Draft Environmental Impact Statement has reached the wrong conclusion in its analysis of the Highway 95 re-route location between Thorncreek Road and the south entrance to the City of Moscow. The following contains the Green Sanctuary Committee's reasons why the ITD's preferred E-2 route is the wrong choice, and why the C-3 route is the right choice. The ITD's E-2 route would take away twice as much prime farmland (arable land of statewide importance) and claim more Conservation Reserve land than the Palouse community's and the Green Sanctuary's preferred route, C-3. The C-3 route would be more consistent with the Moscow City Council's proposed Ring Road southern access to Moscow and to the City's short- and long-range land use goals. The C-3 route would require fewer new, ITD rights-of-way and would provide more points of highway access than E-2. Local and emergency vehicles would have faster response times to the surrounding area via the extra access points the C-3 route would provide. The C-3 alternative would not undermine the viability of 8 businesses along the route, whereas, E-2 would route customers away from these	Much of the information stated is correct and consistent with the DEIS and FEIS. However, additional clarification and responses are provided below. The numbered responses below correspond to the numbers in your comment letter. 2. Additional clarification has been added to the FEIS Section 4.2 regarding the consistency of the alternatives with the City of Moscow land use including the Ring Road Concept. 3. All of the Action Alternatives would have Expressway Access Control, which would limit new non-agricultural approaches resulting in greater safety benefit and less induced growth. The Safety Analysis has been revised since the DEIS was published but the findings remained valid. See General Response Safety-3. See General Response Access. Access, mobility and travel user costs are further evaluated in the FEIS Section 4.10 and in the Mobility and Road User Cost Study (ITD, 2014a). 4. The majority of the businesses in the project area are not dependent on drive by traffic for business. General Response Displacement-1 offers clarification regarding residential and business impacts. Impacted residents and business owners will be compensated and relocated per the Uniform Relocation Act. See the FEIS Appendix 5. Summary of Uniform Relocation Act. Expressway Access Control will reduce the potential for induced growth along the highway, which would ensure safety is improved. See General Response Access. All roadway travelers would benefit from the improved safety.

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			established businesses. E-2 could negatively impact the continued viability, profitability, and sustainability of these businesses. Location along a highway is sometimes the key factor that determines whether or not businesses survive and thrive. The E-2 route could also cause traffic congestion and uncontrolled strip development in east Moscow. Strip development would only benefit the pockets of a few developers. Having enough water to sustain life on the Palouse is a BIG consideration for this area. The C-3 route would not affect any domestic wells, but E-2 would negatively impact at least 2 domestic-use wells. The C-3 alternative is also preferable because it would be constructed at a lower elevation than E-2. Snow and ice would melt faster on C-3 than on E-2, which would be constructed closer to the top of Paradise Ridge. Human lives would be saved on C-3 because road conditions would be less slippery/treacherous during the winter months. The C-3 route, since it is only 0.09 of a mile longer than E-2, would cost about the same to construct. The overall environmental impact of C-3 would be less than the environmental damage E-2 would cause. C-3 could potentially impact 14 remnants of native Palouse prairie, whereas, E-2 would be likely to impact 24 priceless prairie remnants, comprising some of the best Palouse Prairie habitat that is left. The Idaho Native Plant Society, the Palouse Prairie Foundation, some University of Idaho students and staff, the Paradise Ridge Defense Coalition, the Wild Idaho Rising Tide, the Palouse Chapter of the Sierra	5. General Response Water describes the alternatives' impacts to ground and surface water. 6. See General Response Weather-3, Weather-4 and Weather-5 regarding elevation, ice, snow and other weather related driving conditions. 8. None of the Action Alternatives would directly affect Palouse remnants or Paradise Ridge; however, as stated in the DEIS, the E-2 Alternative would be closer and could have indirect effects. For clarification, the E-2 Alternative would be located just west of the proposed Prairie Restoration Site but crosses through a portion of the property that does not have restoration activities planned. This is further clarified in the FEIS Section 4.8. See General Response Weeds and Wildlife. 9. See Safety-2 regarding how wildlife collisions were considered in the Safety Analyses. 10. See FEIS Chapter 9, Environmental Commitments for a description of the mitigation measures and environmental commitments including mitigation for vegetation and wildlife. 11. While the majority of the wetlands in the area are have relatively low vegetative diversity they still provide varying levels of wildlife habitat and hydraulic functions such sediment and toxicant removal for roadway runoff, agricultural runoff and development and residential runoff. Mitigation measures for wetland impacts are described in Ch 9, Environmental Commitments. There is currently no formal stormwater treatment system along US-95. The action alternatives will involve providing stormwater collection and treatment per NPDES regulations. The action alternatives will address stormwater and collect and

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			Club, the Palouse Environmental Sustainability Coalition, the Green Sanctuary Committee, plus other organizations and individuals are trying to preserve native Palouse Prairie soil, plants, wildlife, and water sources. The E-2 route would bisect a proposed Palouse prairie restoration site that is meant to be contiguous with a large and important natural prairie ecosystem on Paradise Ridge. C-3 would result in fewer deer, elk, moose, people and vehicular collisions, injuries, and deaths than E-2. C-3 would pass through poor to marginal ungulate habitat, but E-2 would be routed through 4.4 acres of moderate ungulate habitat. The chances of vehicular collisions and slaughter of both drivers and large wildlife would thus be increased along E-2. E-2 would also harm smaller wildlife. E-2 would take out 4.0 acres of pines and associated habitat necessary to sustain lizards, nuthatches, and bats, such as, the northern alligator lizard, the pygmy nuthatch, and the long-eared myotis bat. C-3 would not impact these areas. C-3 would damage fewer wetlands than E-2. These local wetlands are needed for aquatic plant and wildlife survival and for flood control. The wetlands need to be left alone and unpolluted. C-3 would flush less polluted run-off into local streams and wetlands because it will follow the current highway roadbed for a longer distance than E-2. C-3 would require less new construction with water-impervious surfacing than E-2. Conclusion:	treat stormwater per regulatory requirements. Additional information regarding the avoidance, minimization and compensatory mitigation of wetlands has been added to the FEIS Section 4.6.

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			From the foregoing listing of socio-economic, safety, and environmental concerns, the committee's preference for the C-3 alternative is obvious. The committee hopes that the ITD will do the right thing: cancel the more destructive to people, wildlife, plant life, prairie and aquatic ecosystems, the E-2 route; and choose the less harmful, C-3 alternative. Sincerely, The Green Sanctuary Committee of the Unitarian-Universalist Church of the Palouse: *(five signatures)*	
L-69	Stephan	Flint	Stephan Flint 4961 Lenville Rd, Moscow ID 83843 March 20, 2013 Adam Rush, Public Involvement Coordinator ITD Office of Communications PO Box 7129 3311 W State St Boise ID 83707-1129 – Dear Mr. Rush, I thank the ITD for extending the public comment period on US95 Thorn Creek to Moscow. I have made several comments on the following 2 pages which supplement my February 18 letter. I remind the ITD that the judicial decision on this project in 2003 noted the failure of ITD to work together with the natural resource agencies. Looking at what correspondence is presented in the DEIS, and also the comments in the Department of the Interior's letter of February 22, 2013, it appears	ITD has met with agencies to discuss project impacts and discuss mitigation strategies. Additional mitigation measures may be expressed in a MOU. Mitigation measures are summarized in the FEIS Chapter 9, Environmental Commitments. The purpose of the FEIS document is to make corrections, provide additional information, address substantive public comments, discuss mitigation measures and also to identify the Preferred Alternative of the Agency. The FEIS is an appropriate method for addressing your concerns and other public and agency concerns. A Supplemental EIS is not required at this time. The FEIS document will be made available to all interested parties, agencies with jurisdiction and persons and agencies that provided comments. INTERSECTIONS: There are no plans to include a stop light or grade separated overpass on the north intersection of Old US-95 and proposed US-95 on the E-2 Alternative. Right turn bays, left turn bays, and acceleration lanes will be built at this intersection to

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			the IDT is still resisting the expert opinions of the natural resource agencies. As we have pointed out in previous correspondence (and the Dept. of Interior has pointed out in their letter), the DEIS (and also the Guide to the DEIS) have severe shortcomings. Inconsistencies, lack of data, and a biased or selective presentation of data all have led to problems in the ability of both the public and decision makers reaching an informed decision. I repeat the suggestion I have made previously that a Supplemental EIS is needed to properly present this information. Once the data are unambiguously presented in an unbiased manner, the decision process can proceed. Simply responding to comments in a Final EIS would stifle informed public comment. Thank you for consideration of these comments. Stephan Flint Copies: EPA Region 10 EPA Boise Office ID Department of Fish and Game ID DEQ, Lewiston US Fish & Wildlife Service, Boise Scott W. Reed, Attorney – INTERSECTIONS: If E2 is constructed, the amount of turning traffic at the intersection with North Old US 95 (immediately south of Moscow) will have an estimated 1450 turning vehicles per day (Appendix C4 of Safety Technical Report). This seems to be a substantial number of turning events for an uncontrolled intersection, especially given that this	accommodate turning traffic including grain trucks and large delivery trucks. At least one traffic signal warrant must be met in accordance with Chapter 4C of the MUTCD before a traffic signal would be considered. The reason safety predictions at intersections seem skewed is because the Safety Performance Function equations in the Highway Safety Manual do not use a linear equation for predicted crashes and the volume of traffic. More details about the specific equations used to calculate crashes can be found on pages 9-11 in the Revised Safety Analysis- AASHTO Highway Safety Manual Analysis. Predicted ADTs are different on the remaining US-95 Loop for the different alternatives in the revised safety analysis. The predicted ADT's can be found in Appendix C and E of the Revised Safety Analysis (ITD, 2013). General Response Safety-3 provides information regarding the updated Safety Analysis, which considers the remaining sections of US-95. The worksheets have also been made more legible in this report. CALCULATING ACCIDENT NUMBERS: The method that you have used to calculate crashes does not follow the methods in the AASHTO Highway Safety Manual. The analyses supporting the DEIS and FEIS use the AASHTO Highway Safety Manual Methods to calculating accident numbers. This is the approved method for ITD and FHWA projects. BIG GAME AND SAFETY: See General Response Safety-2 regarding how wild animal crashes were considered in the Safety Analyses. The fencing recommendation is a necessary component of the crossings and was added

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			turning traffic includes grain trucks etc. going to Primeland and will also include large delivery trucks servicing building supply, welding, and other businesses on North Old 95. Are there any plans for a stoplight or overpass at this intersection? In reviewing the accidents calculated for intersections (Tables 6 and 7), it appears the numbers shown for intersections do not correlate with the expected ADT (from Appendix C. 4); rather the accident numbers appear inflated for C3 intersections and deflated for E2 intersections. Specifically, for the C3-North Old 95 intersection, 0.2 accidents are predicted per year. For E2, 0.4 accidents per year are predicted despite the fact the ADT is nearly three times that of the C3 intersection. A logical predicted accident number for E2-Old North 95 would be 0.6 accidents per year. How was the lower number calculated? – Other intersections have similar problems. For C3, Eid, Clyde and Cameron roads have 0.3, 0.2, and 0.2 accidents per year, respectively. Yet these intersections have one fifth or less the ADT of other intersections with 0.2 estimates. Clearly they should be 0.1 or less. How were these numbers determined? (The worksheets provided on the CD are in part illegible, especially in what appears to be the most important part where there is a color background.) – I also take issue with the ADT predicted for the South Old 95 intersection. Identical ADT values	to the FEIS Chapter 9, Environmental Commitments. Descriptions of the different wildlife reports are described in the DEIS Sections 1.1, 3.8 and 4.8. The information has been further clarified in the respective sections of the FEIS. WETLANDS: The Report (Gilmore, 2006) that was referenced was an early draft report and is not a technical report to the DEIS. Instead one comprehensive report was prepared that incorporated the functional assessment information with the wetland delineation. The comprehensive report received a jurisdictional determination from the USACE following a field review in 2012 and was circulated with the DEIS for public comment. The calculations of wetland impacts were based on the final determinations following that review. During the development of the Wetland Report and the DEIS development, it was discovered that some of the polygons for some wetlands were duplicated, resulting in duplicate calculations of impacts for some impacts. Therefore, the impacts were recalculated and reflected in the DEIS. The new, more recent report also provides information regarding new USACE Arid West Supplement for wetland delineation and Rapanos guidance.

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			(500) are shown for both C3 and E2 (Appendix C.4). However, much more traffic will be using the South Old 95 intersection under the E2 alignment, including some traffic from Eid Road and all southbound traffic from residences probably up to and past Cameron Road. As noted above, Eid, North Clyde, and Cameron Roads will all directly intersect the new C3 alignment. Only a very limited amount of traffic would still be using the shorter section of Old 95 if C3 is built. I believe the ADT for this intersection would be considerably higher than 500 with the E2 alignment. – CALCULATING ACCIDENT NUMBERS: – Here I elaborate on what I discussed in my previous letter. Using the corrected calculations above, the accidents for C3 decrease to 10.5 and those on E2 increase to 7.9. When we add in run-off-the road accidents on Old 95 based on the ADT values for Old 95 if E2 is built, the corridor accident number under E2 increases to 8.4. (See my previous letter for a discussion of why accidents should be considered on a corridor basis.) When we add in the additional animal-related accidents (using an estimate from Stakehouse Hill data), the E2 accident number becomes 11.4 per year, clearly surpassing the estimated accidents on C3. If the additional accidents on E2 caused by the more severe weather at this higher elevation (acknowledged by all the locals I talk to but ignored by ITD) are factored in, E2 becomes even less safe.	

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			Note that I have been unable to find documentation of elevation differences between the alignments; elevation data presented in Fig 2 (Community Impact Report, Environmental Justice Section) are meaningless as they are identical for all alignments. – Big Game and Safety: – Clearly ITD went "consultant shopping" in an attempt to downplay the prevalence of big game along the E2 alignment. (Note that the Department of Interior letter also asks how the different studies were reconciled, as this is not evident in the DEIS.) The DEIS (Ungulate Effects section beginning on p169) cites the work of Sawyer (2010) which rates the habitat along this route only "moderate" at best. Here the DEIS ignores both the work of Melquist (a detailed habitat map and a discussion of animal movements) along with the anecdotal evidence provided by local residents -- game trails, sign, and sightings. – In Appendix B3 of the Safety report, discussing deer-vehicle collisions, it clearly states, "The only widely accepted method with solid evidence of effectiveness is well-designed and maintained fencing, combined with underpasses or overpasses as appropriate." Given the recommendation of Melquist and this clear statement in the DEIS supporting documentation, it is difficult to see the justification for the proposed clear-zone method recommended for E2 and ignoring the	

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			recommendation of fencing with underpasses. – Wetlands: – The Department of Interior letter (see p. 2 of their letter) questions how a decrease in wetland acreage (impacted by the E2 alignment) occurred between the 2006 field work and the current 2012 document which is included as supplemental material with the DEIS. I agree. I am puzzled as to what happened as the Wetland Technical report states, "No wetland determinations made in the original 2004 through 2005 work would be affected by the changes in the delineation guidelines." This needs explanation. – #	
L-70	Mary – Palouse Ridge Defense Coalition	Ullrich	Paradise Ridge Defense Coalition P.O. Box 8804 Moscow, ID 83843 – March 21, 2013 – Adam Rush, Public Involvement Coordinator Office of Communications Idaho Transportation Department P.O. Box 7129 3311 W. State Street Boise, Idaho 83707-1129 – Dear Mr. Rush, Thank you for the extension of the comment period regarding the Idaho Transportation Department's	The DEIS was widely distributed to the public and agencies as described in FEIS Chapter 7, Public Involvement and Agency Coordination. The DEIS must have detailed analysis of significant effects of the alternatives while still being presented in plain language. Unfortunately, this results in lengthy and detailed technical reports. We appreciate the Paradise Ridge Defense Council's and all of the public's careful study of the DEIS and value each of the public's comments. ITD and FHWA have given serious consideration to the Paradise Ridge Defense Council's substantive comments with equal consideration to all other substantive public and agency comments. The DEIS discloses that the E-2 Alternative is similar to the 10A alternative that was evaluated in the EA. The EIS for US-95 Thorncreek Road to Moscow began with

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			(ITD) Thorn Creek to Moscow Highway 95 realignment project. Because of this, individuals, agencies, and Paradise Ridge Defense Coalition (PRDC) partners have been able to adequately invest the time and energy necessary for careful study and analysis of the U.S. 95 Thorncreek Road to Moscow Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation (DEIS), which is relatively inaccessible to the public due to its length, vast scope, and detail. Individuals, agencies, and members of the coalition have made a sincere effort to gain a complete understanding of the DEIS and all its essential components that should contribute to selecting the most responsible choice of a new alignment for U.S. Highway 95. Careful analysis, accompanied by accurate citation of experts' studies in the DEIS, continually reveals that the E-2 alternative is not the best or most responsible of the three possible alignments. As these individuals, agencies, and partners in the coalition have spent hours conscientiously reading hundreds of pages in the DEIS, we are expecting ITD to read and consider all the comments that they have thoroughly presented. Carefully prepared comments from agencies, such as the U.S. Department of the Interior Office of Environmental Policy and Compliance, the U.S. Environmental Protection Agency, and the Idaho Departmentof Fish and Game, partners in the PRDC, such as the Palouse Group of the Sierra Club, and individual members of the PRDC, such as Stephan Flint, David	the Notice of Intent on November 13, 2003. One of the requirements of NEPA is that a range of reasonable alternatives to fulfill the purpose and need be evaluated in the DEIS. There is no requirement to exclude reasonable alternatives because they had been previously considered as part of a separate study. During the DEIS, the E-2 Alternative was one of the alternatives reviewed by the public during the first and second stages of the screening process. The rationale for forwarding it for detailed analysis in the DEIS and for identifying it as ITD's Preferred Alternative is summarized in the DEIS and FEIS Section 2.6. See General Response Agency regarding the difference in opinion regarding ITD's Preferred Alternative. For clarification, the USACE has not chosen a preferred alternative at this time. The National Environmental Policy Act (NEPA) process provides public involvement opportunities during the development of the Environmental Impact Statement. Providing publications and materials to the general public is one method of reaching out to the public and encouraging their involvement. See General Response Displacement-1 and Displacement-2 regarding clarification of the displacements and impacts to businesses and residences. The residential and business impacts in the DEIS were based on conceptual level detail. The impacts were evaluated in greater detail after the hearing and clarified in the FEIS to distinguish between impacts and potential impacts but are based on conceptual level information. Exact displacements will be determined

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			Hall, and Al Poplawski all deserve serious consideration by ITD. Due to the history of ITD's previous handling of public and agency input, we cannot help but be skeptical about the sincerity of ITD in truly considering input from agencies, coalition groups, and individuals. To begin with, before any public input, the first map of the U.S. Highway 95 corridor in consideration of a new alignment between Genesee and Moscow, published in January 2000, already showed, among 11 possible routes, E-2 (then called 10A) as "ITD's Proposed Route." This alignment was determined by a small, unrepresentative "focus group" selected by ITD. Because ITD was required by law to offer the public at least one alternative besides their "proposed route," ITD determined that widening current U.S. Highway 95 would be the other alternative. In addition, the Environmental Assessment Appendix, May 2002, page 4, states, On July 12, 2001, a third Merger meeting was held in Lewiston, where participants reviewed the revised Environmental Matrix (Table A-3). Participants discussed the prior meeting decision to carry forward Alternative 6 (current U.S. Highway 95), 10A (current E-2), and No¬ Action. The meeting concluded with participants agreeing to add Alternative 4 (close to current C-3) back into the decision process, as a "compromise" between Alternatives 6 and 10A. After this meeting, ITD evaluated the project schedule delay implications of bringing Alternative 4 back into the Merger	during design when detailed topographic, geotechnical and design detail is available. See the General Response Displacement-1 and Displacement-2 for clarification of displacement information. See the General Response Safety-6 regarding the significance of the differences in length and safety between alternatives. FHWA and ITD intend to fully comply with the NEPA process which includes considering and addressing all substantive comments received during the DEIS public comment period. Each comment has been read and considered and responses provided as appropriate. Where necessary, additional information, corrections, clarification or mitigations have been provided in the FEIS. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			discussion and decided to recommend to the Merger Agencies an action to mitigate the natural environment impacts of Alternative 10A. After ITD was told by court order in 2003 that their own regulations required that they conduct a full environmental impact statement (EIS) for the construction of a highway along a new right-of-way, ITD went to the general public to solicit input. ITD held public workshops whereby hundreds of concerned citizens came in good faith and worked together many hours over the course of several days to determine compromise alignments. Thereafter, ITD trimmed down the alternatives suggested through these workshops to the three¬ alignments currently under consideration. ITD then proceeded to conduct a full EIS. Ten years later, ITD continued to present its "preferred alternative" as E-2. Was all that public and agency input really seriously considered? After carefully examining the very inadequate DEIS and taking into account a serious lack of data and misrepresentation of data, the evidence favoring E-2 disappears. The DEIS Wildlife Technical Report, "Final Review of Wildlife Mitigation for the Thorn Creek-Moscow Highway Development Project (U.S. 95)" prepared by William C. Ruediger, September 2007, states, "Several resource agencies have indicated that their 'preferred alternative' is the center route...The resource agencies involved in the project include Idaho Department of Fish and Game (IFG), U.S. Fish and Wildlife Service (FWS), U.S. Environmental Protection Agency (EPA), and the	

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			U.S. Army Corps of Engineers (Corps)." It appears that ITD did not seriously consider input from agencies and experts. One more concern is the damage and control of public opinion due to the misinformation and biased selective presentation of information in ITD's "Guide to the Environmental Impact Statement" brochure. For most people this brochure was the only information that guided their comments and opinion of the best alignment. Not many people read the full EIS due to its great length and often confusing detail. The biased presentation of pros and cons in ITD's brochure undoubtedly influenced public opinion. On page 10, the pros for E-2 are presented first with the shortcomings hidden at the end, while on page 9, shortcomings (some of which were just not true) of C-3 come first and the advantages are hidden at the end. In the ITD brochure, page 9, "C-3: The Central Alternative", it states, C-3 "would displace eight businesses". At the hearing the Right-of-Way experts stated that in fact "No businesses will be displaced and the widening of current Hwy 95 would have no effect beyond a potential noise increase". The Right-of-Way experts also said that E-2 would displace the most residents because of issues with a displaced well and that ITD had decided to relocate all of the residences in the mobile park and a house above the park on Eid Rd. They further stated that C-3 would displace only 1 residence. This information makes 2 points ITD made against C-3 untrue! In addition, superlative statements based on small, statistically insignificant	

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			differences were presented to sway public opinion to ITD's wishes, e.g., alternative travel times, length of routes, safety measurements, etc. Clearly, the public has been deceived and controlled. This borders on criminal! Because of our concern that input from important agencies and the public has not previously been seriously considered and incorporated into ITD's decision-making process for this project, we request to know in some detail the process by which ITD plans to read and act on the many carefully presented comments sent to ITD. We expect that this should be a long and arduous process. However, we request that we be informed of its progress. Thank you for your attention to these comments, Mary Ullrich PRDC Secretary – Copies sent to: EPA Region 10; EPA Boise Office; Idaho Department of Fish and Game; Idaho Department of Environmental Quality, Lewiston; U.S. Fish and Wildlife Service, Boise; Federal Highway Administration, Idaho Division; Department of Interior, Office of Environmental Policy and Compliance; Scott Reed, Attorney	
L-71	Diana	Armstrong	Diana Armstrong 116 West Morton Moscow, ID 83843 March 18, 2013 – Office of Communications	At this point, no alternative has been selected for construction. The NEPA process requires that the public and agency comments be fully considered and addressed in the FEIS before the Record of Decision is issued. See General Response NEPA for a description of the NEPA process and see General Response

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			ITD Box 7129 Boise, ID 83707-1129 – Comment on DEIS for US Highway 95 Thorn Creek Road to Moscow I'm pretty sure the deck is stacked against me, and the time I've taken to inform myself and participate in this commenting is wasted. For apparently you are determined to have the E-2 alternative over the all-around better C-3 alternative. So one ends up asking: What corporate logos are you wearing on your hard hats? Who owns property where E-2 would go? Does someone want to "develop" Paradise Ridge? What information do we (public) not have? Why do you keep shopping for "experts" who tell you what you want to hear? What's behind Idaho Department of Transportation's preference for the E-2 alternative, years ago the 10A alternative, because it's not data (or common sense)? (And another thing one wonders: if preventing accidents were truly a priority, why didn't IDOT reduce the speed limit and/or put up warning lights on that curvy section of 95 decades ago? That would have been a no-brainer temporary solution.) The City of Moscow prefers the C-3 alternative. The Idaho Fish and Game Department and US Environmental Protection Agency and Fish and Wildlife Service are opposed to the E-2 route. Your DEIS statement is flawed and draws false conclusions. I offer the following:	Schedule for the anticipated schedule. FHWA and ITD have identified the E-2 Alternative as their Preferred Alternative based on the ability to meet the project purpose and need as well as balancing human and natural environmental considerations. FHWA and ITD are not catering to corporations. The project is intended to benefit all travelers including the local population, regional travelers and freight movement. The NEPA process does not preclude using alternatives because they were included in the previous Environmental Assessment. See General Response Alternative. Paradise Ridge is an important local resource. It is privately owned with more than 50 commercial and residential developments. Access to Paradise Ridge would be Expressway Access Control, which would limit development along the highway as described in General Response Access. The DEIS Section 1.1 describes the different wildlife technical reports and explains why multiple wildlife studies were completed. A regarding making safety improvement over the last 10 years, ITD has a Statewide Transportation Investment Program, which considers how funding would be allocated based on state and regional priorities. Improving this section of US-95 has been ITD District 2's first priority. See General Response Safety-4 regarding smaller safety improvements on US-95. See General Response Agency regarding differences of opinions regarding ITD's and FHWA's Preferred Alternative. For clarification of your statements, E-2 is shorter than C-3.

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			E-2 has a longer length at a higher elevation = worse winter driving conditions. E-2 crosses more deer corridors and cuts deer off from 4 ponds = more collisions. E-2 crosses through better ungulate habitat = more collisions. E-2 crosses more water courses = more wetlands impact. E-2 requires more and deeper cuts and fills and more culverts = more costly. E-2 would displace 5 or more residences (C-3, one) = more disruption to citizens. E-2 creates more new impervious surfaces = more pollutant runoff near farmland. E-2 takes more prime farmland out of production. E-2 has more negative visual impact, including headlights at night. E-2 has a much greater negative impact on the very rare Palouse Prairie ecosystem. E-2 destroys 4 acres of pine stands and associated habitat. E-2 is less convenient for local residents. C-3 uses a significant amount of the current road. We who are opposed to the E-2 alternative are reasonable people, but we are embittered and frustrated by IDOT's misplaced loyalty or misplaced priorities. Diana Armstrong Moscow citizen for 37 years	General Responses Weather-3, Weather-4 and Weather-5 discuss the relative differences in elevation, temperature, ice, snow and fog between alternatives. See General Response Safety-2 regarding how wildlife collisions are considered in the Safety Analysis. General Response Displacement-1 offers clarification of residential and business impacts. General Response Weeds and Wildlife discusses the alternatives' effects to the vegetation and wildlife on Paradise Ridge.
L-72	Jason W.	Lyon	February 19, 2013 – Adam Rush, Public Involvement Coordinator	1. The access for rural residents using existing US-95 was evaluated and will function similarly as it does today including for residents on Eid Road. The existing

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			ITD Office of Communications 3311 W. State Street, Boise, ID 83707 – RE: Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation US-95 Thorncreek Road to Moscow. – Dear Mr. Rush, The following letter presents my comments on the recently released Draft Environmental Impact Statement (DEIS) for the Thorncreek Road to Moscow section of US Highway 95. I am concerned that the totality of environmental and social impacts associated with the E-2 route were not fully addressed in the DEIS. After a complete review of the DEIS and associated technical documents, I offer the following specific comments and concerns for your consideration: 1. Lack of access to the new highway for rural residents living along the route under the E-2 alternative. As presented in the DEIS, the E-2 route will leave the existing US-95 corridor at the top of Reisenauer Hill and does not connect to it again until just immediately outside Moscow. This is discussed in numerous places throughout the DEIS as a positive attribute in that the number of "access points" to the highway will be reduced. This assumption doesn't address the impact this will have on rural residents living along the Thorncreek to Moscow corridor, specifically those residents from Eid Road north toward Moscow.	US-95 loop will still be available for travel north and south and will allow accesses at the intersections with the new alignment. Existing US-95 may be turned over to the NLHD but will have traffic volumes decrease by about 95 to 97 percent depending on the alternative; therefore it would have significantly fewer predicted crashes. Additionally the new alignments would be designed to AASHTO standards with additional lanes, a divided median, shoulders and other design elements that would improve safety over existing conditions. The information is included in the revised Safety Analysis (ITD 2013) and included throughout the FEIS. A Mobility and Road User Cost Study (ITD 2014a) was also prepared which addresses travel times and traveler costs within the project. The E-2 Alternative would have improved travel times for most commuters, emergency response vehicles and school buses. This information has been incorporated into the FEIS Section 4.1. See General Response Maintenance-2. Actual road elevations will be determined during final design. See General Response Safety -3 regarding how safety of the existing US-95 was considered in the revised Safety Analysis. See General Response Safety-5 regarding Reisenauer Hill. See General Response Safety-2 regarding wild animal crashes. See General Response Weather-3, Weather-4, and Weather-5 regarding weather related safety. The Revised Safety Analysis also considers the use of

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			Table 9, found on page 59 of the DEIS, indicates that over 1,200 people live along the Thorncreek to Moscow corridor. Nearly all of these rural residents use this route daily to commute to work, school, or other purposes. This accounts for potentially several thousand vehicle trips per day, at least. If the E-2 alternative is constructed, nearly all of these vehicles will continue to traverse the old US-95 route. Very few people, if any, will backtrack the several miles required southward to the top of Reisenauer Hill to enter the new highway. For someone like me, who lives on Eid Road, backtracking would effectively make the 5-mile trip to Moscow a 7 or 8 mile trip. In addition, emergency services, school buses, garbage collection services, and mail delivery, among many others, will all be under the same conditions. So, while elimination of all county road access points along the E-2 alternative sounds good and allows ITD to tout the preferred alternative as the safest, it provides absolutely no benefit to those local residents who rely on this route to travel to work and school every single day. I feel ITD must go back through the DEIS and reevaluate all conclusions they've reached as they relate to impacts associated with removal of all county road access points from the E-2 route. One such example can be found with nearly the entire second paragraph on page 141 of the DEIS. In this paragraph ITD states that the preferred alternative would "benefit" residents along Eid Road by, "...improving the safety of US-95 and improving	existing US-95 in the modeling. The information has also been revised in the associated technical reports. As you stated, the two access points for the E-2 Alternative would be the intersections of the new and existing US-95 alignments. Since the existing US-95 may be turned over to the NLHD, it would be part of the county road system. The design details and specific elevation of the bridge structure cannot be determined until detailed geotechnical and survey data is available for design. This will be available during the design process. Additional information regarding visual impacts has been provided in the FEIS Section 4.11. ITD will work closely with farmers and other landowners during the design process to ensure that farm equipment and other vehicles can pass through safely. The noise analysis was completed using FHWA Noise Abatement Criteria, which is the approved methodology for predicting and modeling noise impacts. See FEIS Section 3.12 and 4.12 for additional clarifications and corrections regarding noise impacts in the Hidden Village and Benson Mobile Home parks. See the FEIS Chapter 4.1 for a clarification of the impacts to the Hidden Village and Benson Mobile Home Parks. The Community Impact Assessments was not prepared by the Citizens for a Safe Highway US 95 Group but was prepared by an independent consultant who obtained data from many sources and conducted interviews from a diverse population of community members, realtors, residents, businesses, government agencies, and others as described in the DEIS and FEIS Sections

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			highway access and mobility," by "...reducing commute times and facilitating more efficient access to services," and through "Ingress and egress of vehicles, including emergency response units… by the use of a turn bay." These are all absolutely incorrect. Access for residents living along Eid Road, and really all rural residents living in the corridor, will not benefit under the preferred alternative. Essentially, nothing will change regarding our ability to travel back and forth to Moscow. The "turn bay" discussed in this section will be located several miles away from the mobile home parks at the top of Reisenauer Hill. How does this benefit residents along Eid Road? How will it reduce our travel times? We will all primarily be driving the old US-95 route that doesn't meet the AASHTO standards and has been identified as having some of the highest accident rates in State of Idaho (Table 31 found on page 131 of the DEIS). How does the E-2 alternative make traveling this route safer for us? Another example of an incorrect finding regarding access can be found in the second to last paragraph on page 140 which states the C-3 alternative would "...improve the highway access for all users but to a lesser extent compared to the E-2 and W-4 alternatives." I believe this statement to be incorrect. Under the C-3 alternative, access to the new US-95 route would actually be provided for rural residents living along Eid Road. This is not provided in the E-2 alternative as Eid Road is bypassed via an overpass. Therefore, access to rural residents would clearly be better under the C-3	3.1.2, Methodology. The general trends regarding property value impacts were determined with input from realtors, government agencies and others. While there could be indirect effects to property values as a result of the road location, the purpose and need of the project, to improve safety and capacity for all users will benefit property owners as well as the general travelling public. The referenced sentence on page 45 of the DEIS which explains why the E-2 Alternative was forwarded was correct. The E-2 Alternative in this section is being compared to the other Eastern Corridor Alternatives that were evaluated early in the scoping and screening process. It was not comparing the DEIS Action Alternatives that were forwarded for detailed study. Therefore, the statements about the E-2 Alternative having less impact to wetland and rare plant populations were valid. The rare plant communities that are referenced in the statement refer to those identified in the Vegetation Technical Report and therefore are accurate. While some wetlands may have rare plant communities, these wetlands are not known to fit that category. The DEIS does describe in Chapter 9, Indirect and Cumulative Effects, that the E-2 Alternative would be closer to more Palouse remnants and rare plant communities compared to the other alternatives. See General Response Weeds and Wildlife. Additional information has been added to the FEIS regarding Palouse remnants, the ecological function of CRP land, the giant Palouse earthworm, restoration projects,

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			alternative not E-2. Table 53 of the DEIS (page 176) indicates that there are supposed to be 2 county road access points along the E-2 route, however, these two access points do not show up on any of the maps in the DEIS. I can only assume those depict where E-2 leaves and reenters with the current US-95 corridor? If so, I find that to be highly misleading as these locations are not truly "county road" access points, at least not yet, and some readers may believe access to the E-2 route will actually be provided via existing county roads when it will not be. Along these same lines, the last paragraph of page 176 states that "shortened travel times" could benefit "...emergency service response, school access, bicyclists/pedestrians, and mail delivery." I believe all of these statements to be incorrect, at least as they relate to the rural residents that live along the Thorncreek to Moscow route. As mentioned above, there will be no improvement what-so- ever in these services or in travel times under the E-2 alternatives as there will be no convenient access to the route from rural locations. In some cases, especially with emergency services, the E-2 alternative could actually result in increased travel times. 2. I believe the reflection of proposed accident rates are misleading and do not accurately reflect travel patterns created if the E-2 alternative is constructed. I have concerns with how ITD has presented and	noise impacts to birds and other wildlife, and indirect and cumulative effects. CRP land is a voluntary program on private lands with no assurance of long-term preservation.

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			utilized the crash data in the DEIS. The Safety section (3.10.3) on page 111 states that, "Safety issues within the study area relate primarily to the road geometry and access onto the roadway." I'm curious how ITD has determined that "access to the roadway" is a primary safety issue based on the data presented in this section? On the following page of the DEIS, Table 29 and 30 list specifics on crash data for the past ten years (2002-2012). Table 29 indicates there were 220 total crashes along the Thorncreek to Moscow route over the last ten years. While Table 30 indicates that 22 of those crashes or (10%) were "intersection related." Of the five crash factors or types presented in Table 30 (wildlife, intersection related, head-on, negotiating a curve, and weather), intersection related is followed only by head-on as the least likely factor or type of crash. Why then does ITD downplay the significance of wildlife and weather related accidents in the Safety Technical Report and focus on one of the least likely crash types as a driver for the study? ITD states in several locations throughout the DEIS that the E-2 route will have the lowest potential crash rate of the three action alternatives. This finding is based on a safety analysis conducted by ITD and reported in the 2012 Safety Technical Report. However, what this analysis fails to take into account is that the E-2 alternative will effectively eliminate most all rural traffic (those folks living north of Eid Road) from utilizing the new highway. Those rural residents who drive back and	

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			forth to Moscow on the old US-95 route every single day will still be experiencing the narrow shoulders, inadequate corners, and 60 (or so) of the 66 access points. Even those that choose to drive south to actually utilize the new highway (as proposed in E-2), will still have to traverse the majority of Reisenauer Hill to do so. Reisenauer Hill is one of the most dangerous parts of the existing route. The presentation of crash data throughout the DEIS, both the numbers of potential future crashes and the fatalities associated with them, is misleading and not truly representative of what construction of the E-2 alternative will result in. These predictions must be tempered with the fact that all current issues and concerns associated with the no action alternative will continue to be a problem under this alternative. Therefore, I feel in order to truly predict potential crashes and fatalities associated with any of the action alternatives, but especially E-2, ITD must also include an analysis of the future predicted crashes and fatalities along the old US highway route associated with rural residential use. These figures must then be added to those predicted for the action alternatives to get a true sense of what the safety impacts will be for all people who use this travel route. This is important as the historical data includes everyone, not just those that drive through from Moscow to Genesee, Lewiston, or other points south. 3. There is very little specific information provided in the DEIS, or associated technical reports, on the	

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			elevation of the E-2 alternative as it crosses Eid Road or the design of the overpass. There is no discussion of the style and kind of overpass structure that is proposed to be built over Eid Road. Nor can I find anywhere within the DEIS how high the finished roadway will be as it crosses Eid Road and as it heads north from there. I live immediately east of the proposed overpass along Eid Road and can attest to the level and type of traffic Eid Road handles. It is very common during the spring and late summer/fall months to see large wheel tractors, combines, grain trucks, and large loaded trucks of hay traveling from farm ground to the east and west of the proposed E-2 alignment to and from US-95. These vehicles are all extremely tall and will likely not easily fit under a standard height highway overpass. I'm concerned that the E-2 alternative will effectively create a barrier to agricultural equipment movement up and down Eid Road. Currently, fields on both sides of the preferred alternative location near Eid Road are farmed. The farmer is reliant upon moving his machinery up and down Eid Road to access his fields. How will this be accomplished if his agricultural machinery will not fit under the overpass structure planned for Eid Road? This could create a potential economic hardship and be a mobility issue as well. This is not currently addressed at all in the DEIS. The viewshed analysis presented in the DEIS and associated technical reports doesn't adequately address viewshed impacts to rural residents.	

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			I live along Eid Road and my home and property are located immediately east of the proposed E-2 alignment. There is absolutely no detailed discussion anywhere in the DEIS about the nature and scale of visual impacts associated with the highway and overpass structure proposed for construction near my property. There is discussion regarding impacts to viewsheds from the top of Reisenauer Hill looking north, or from the City of Moscow looking south, but nothing regarding the very real adverse impacts to rural residents along Eid Road. My property and home have excellent uninterrupted views of the Palouse region to the west and south. The foreground of these significant viewsheds will be impacted by the planned overpass and associated elevated highway proposed through the E-2 alignment. I consider this to be a serious long-term, adverse impact on the visual qualities associated with my property and home. The second paragraph on page 181 states "A new bridge at Eid Road would create a long-term visual effect to residences." This needs to be changed to a "major long-term negative visual impact on residents" and a more detailed analysis of what these impacts are and how they will be mitigated by ITD presented. The noise effects analysis is not adequate and doesn't address noise concerns for rural residents. In reviewing the noise technical report referenced in the DEIS, it seems seven noise receptors were placed in the general vicinity of the E-2 alignment as it crosses Eid Road. However, five of these locations	

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			were placed in spots that will be destroyed if the preferred alternative is constructed. Why were these receptors placed in locations that will "displaced" if the E-2 alignment is constructed? This is a major failing in the noise study and a very convenient way to justify the following statement in the first paragraph on page 186 of the DEIS "The required and optional abatement measures were not considered feasible and reasonable for the impacted receptors which were not displaced." If the receptors had been placed in locations in the Eid Road vicinity that were not being "displaced," but will for sure be impacted by the noise generated from this elevated highway, perhaps the required abatement measures would be justified. In addition, what criteria were utilized when locations for the noise receptors were being installed in the first place? If the preferred alternative is built, it will be an elevated highway across Eid Road. Depending upon the height of this highway, the roadway will likely result in major long-term negative noise related impacts on all residences living along the first mile or so of Eid Road. The noise impacts from this alternative are not limited to homes within 300 feet of the centerline. Noise can travel great distances and drastically alter what is now a very quiet location. I see this as a major failing of the noise analysis presented in the DEIS and this should be adequately addressed and more thoroughly researched. Receptor locations must be selected based on where potential impacts from the preferred	

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			alternative will be felt, not underneath the finished roadway. Impacts to community cohesion are inaccurate and not fully addressed in the DEIS and associated technical reports. Page six of the Community Impact Assessment Update technical report provides the following definition for the community cohesion study: *The community cohesion evaluation considers any changes in the pattern of social networking within a neighborhood or community, which includes splitting neighborhoods, isolating groups, generating new development, changing property values, or separating residents from community facilities. The community cohesion evaluation also includes noise and visual impacts from a project.* The primary study cited throughout the Community Impact Assessment technical reports regarding potential impacts to community cohesion was prepared by the Citizens for a Safe Highway 95 group. This group has shown strong public support for the E-2 route, and I question whether any "studies" they have conducted can and should be viewed as unbiased. I also strongly question whether ITD should rely on the findings of any study produced by a special interest group for such a high profile project. I have lived in my home along Eid Road since 2006 and have never been contacted by any group (public or private) regarding my concerns, issues, or beliefs about any of the action alternatives reviewed in this DEIS. My home is	

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			immediately east of the overpass structure proposed under the preferred alternative, and my only contact regarding this project has been several requests from ITD to grant permission for access to my property for project related studies. The findings presented by the Citizens for a Safe Highway 95 group certainly do not reflect my beliefs regarding this issue at all. I also question whether the Citizens for a Safe Highway 95 group are experts in the field of community cohesion studies, whether they utilized a scientifically valid study design, and if their methodology and findings will hold up in court. I also question how the DEIS can state in the third paragraph on page 138 that "...none of the alternatives would cause a major disruption to community cohesion." The density of homes along the first mile or so of Eid Road makes it one, if not the most, densely occupied communities along the entire Thorncreek to Moscow route. This community is very quiet and has excellent uninterrupted views westward towards Pullman. Construction of the E-2 alternative will remove five homes, impact numerous others, and effectively cut the community in two. Using the definition provided in the Community Impact Assessment, these are exactly the kind of issues the community cohesion study was supposed to address and analyze. This is clearly not the case for the studies utilized in the analysis presented in the DEIS on which ITD is basing their findings. Implementation of the E-2 alternative would create major, long-	

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			term negative noise, visual, and community cohesion impacts for the Eid Road community. The DEIS doesn't address this concern at all. Potential impacts to property values of rural residences from the preferred alternative are not adequately addressed. It is stated in the last paragraph on page 143 of the DEIS, and numerous times throughout the associated technical reports, that property values will either not be impacted or may even increase throughout the project area under the E-2 alternative. I believe this to be absolutely untrue as it relates to the rural residences along Eid Road. The scenic qualities, including natural quietness and uninterrupted views to the west, provide value to my property. Placing an elevated freeway several hundred meters from my property line will not increase my property value. In fact, page 29 of the Community Impact Assessment Technical Report, Part 2 states "With respect to the proposed project, it is reasonable that by reducing access to a property, the value of that property may be reduced." This assertion has seemingly been ignored by ITD and is not discussed in any manner in the DEIS. As already discussed above, implementation of the E-2 alternative will provide no benefit, and in fact may actually reduce access for rural residents living north of Eid Road along the Thorncreek to Moscow corridor over the long-term. Therefore, I feel potential impacts to property values needs to be reassessed and adequately addressed in the DEIS.	

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			Issues associated with impacts to vegetation and wildlife habitat are not completely accurate or adequately addressed in the DEIS. The first sentence in the last paragraph on page 45 of the DEIS states that, "The E-2 alternative was forwarded for consideration because it had the least effect to wetlands, cultural resources and was the only alternative to not effect rare plant communities." This is absolutely not a correct statement. Table 2 on page 13 of the DEIS indicates that the E-2 route impacts 3.61 acres of wetlands while the C-3 alternative would impact less than 1 acre. The assertion that the E-2 route has no impacts to rare plant communities is also incorrect. This alternative will have the greatest impact to rare plant communities located along Paradise Ridge, and this needs to be addressed throughout the DEIS. Impacts of the E-2 alternative on Conservation Reserve Program (CRP) lands are not adequately addressed anywhere in the DEIS either. In the Citizens for a Safe 95 attachment to the Community Impacts Assessment technical report it is noted that CRP ground "...(is) less productive and poorer quality." While this may be true on a case by case basis, as a blanket statement this represents a clear lack of understanding of the focus and purpose of the CRP Program. The CRP program was created through the 1985 farm bill and was initially focused on removing erosion prone lands from production through the establishment of natural covers. However, subsequent farm bills have refocused the	

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			CRP program on the benefits of conserving lands for wildlife habitat, wetland restoration, and other resource based projects that benefit the overall conservation and preservation of natural environments. A detailed analysis of lands enrolled in the CRP program and impacts to their associated conservation benefits for all of the alternatives must be included in this DEIS. I also strongly recommend ITD hire a reputable expert to perform this study, not rely upon the findings of studies produced by special interest groups such as Citizens for a Safe Highway 95. Impacts to the pine stands along Paradise Ridge are also not adequately or accurately addressed in the DEIS. Section 4.8.5, starting on page 167 and continuing to page 168, states that "The E-2 alternative would affect 3.9 acres...that could offer potential nesting habitat for the long-eared myotis and pygmy nuthatch..." This is an incorrect statement, as the technical report produced by Melquist (page 11) states that the pygmy nuthatch already are known to exist in this stand. Also, in that same section of the DEIS (4.8.5), ITD has concluded that the loss of this 3.9 acres of habitat is "considered minor" and that there is "an abundance of habitat nearby." Who concluded this? This is blatantly incorrect and obviously not the case. In fact, the Melquist report suggests avoiding construction along the E-2 corridor for this very reason. Why is this not reflected in the DEIS? The last full paragraph on page 55 of the DEIS states the following: "The primary disadvantages of E-2	

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			compared to the other alternatives are that it would be located closer to the base of Paradise Ridge which provides moderate ungulate habitat and E-2 would also affect pine stands that are potential long- eared myotis, northern alligator lizard and pygmy nuthatch habitat." While this statement is mostly accurate, it is not complete. As mentioned above, pygmy nuthatch are already known to inhabit this pine stand. The E-2 alternative will also have adverse impacts on community cohesion, viewsheds, noise, property values, access for rural residents, rare plant communities, native and restored Palouse Prairie habitats and CRP ground. In the second to last sentence of the last paragraph on page 45, ITD also states the E-2 alternative was forwarded for consideration "...because it had the least overall effects compared to the other alternatives in the eastern corridor." Perhaps a more appropriate statement regarding the E-2 alternative would be, "the E-2 alternative will result in the most long-term adverse impacts to nearly all resources of concern studied in this DEIS when compared to those alternatives forwarded for analysis." I also really question whether the E-2 alignment actually addresses the given purpose and need for this project articulated on page 2 of the DEIS. I strongly believe the E-2 route will not "improve" safety for any of the rural residents living along the Thorncreek to Moscow route. Nearly all of us will still be required to drive the old US-95 highway on a daily basis, and while overall traffic volume on the old route will be likely be greatly	

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			reduced we'll all still have to deal with all of the route's current safety issues and the accident will likely still remain high. Based on a careful review of the DEIS and associated technical documents, I strongly support ITD's adoption of the C-3 alternative. Jason W. Lyon 1090 Eid Road, Moscow, Idaho (208) 669-1867	
L-73	Rachel JT.	Lyon	February 19, 2013 – Adam Rush, Public Involvement Coordinator ITD Office of Communications 3311 W. State Street, Boise, ID 83707 RE: Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation US-95 Thorncreek Road to Moscow. – Dear Mr. Rush, The following letter presents my comments on the recently released Draft Environmental Impact Statement (DEIS) for the Thorncreek Road to Moscow section of US Highway 95. I am concerned that the totality of environmental and social impacts associated with the E-2 route were not fully addressed in the DEIS. After a complete review of the DEIS and associated technical documents, I offer the following specific comments and concerns for your consideration: 1. Lack of access to the new highway for rural residents living along the route under the E-2 alternative.	See Response L-72.

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			issues and concerns associated with the no action alternative will continue to be a problem under this alternative. Therefore, I feel in order to truly predict potential crashes and fatalities associated with any of the action alternatives, but especially E-2, ITD must also include an analysis of the future predicted crashes and fatalities along the old US highway route associated with rural residential use. These figures must then be added to those predicted for the action alternatives to get a true sense of what the safety impacts will be for all people who use this travel route. This is important as the historical data includes everyone, not just those that drive through from Moscow to Genesee, Lewiston, or other points south. – 3. There is very little specific information provided in the DEIS, or associated technical reports, on the elevation of the E-2 alternative as it crosses Eid Road or the design of the overpass. – There is no discussion of the style and kind of overpass structure that is proposed to be built over Eid Road. Nor can I find anywhere within the DEIS how high the finished roadway will be as it crosses Eid Road and as it heads north from there. I live immediately east of the proposed overpass along Eid Road and can attest to the level and type of traffic Eid Road handles. It is very common during the spring and late summer/fall months to see large wheel tractors, combines, grain trucks, and large loaded trucks of hay traveling from farm ground to	

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			the east and west of the proposed E-2 alignment to and from US-95. These vehicles are all extremely tall and will likely not easily fit under a standard height highway overpass. I'm concerned that the E-2 alternative will effectively create a barrier to agricultural equipment movement up and down Eid Road. Currently, fields on both sides of the preferred alternative location near Eid Road are farmed. The farmer is reliant upon moving his machinery up and down Eid Road to access his fields. How will this be accomplished if his agricultural machinery will not fit under the overpass structure planned for Eid Road? This could create a potential economic hardship and be a mobility issue as well. This is not currently addressed at all in the DEIS. – The viewshed analysis presented in the DEIS and associated technical reports doesn't adequately address viewshed impacts to rural residents. – I live along Eid Road and my home and property are located immediately east of the proposed E-2 alignment. There is absolutely no detailed discussion anywhere in the DEIS about the nature and scale of visual impacts associated with the highway and overpass structure proposed for construction near my property. There is discussion regarding impacts to viewsheds from the top of Reisenauer Hill looking north, or from the City of Moscow looking south, but nothing regarding the very real adverse impacts to rural residents along	

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			Eid Road. My property and home have excellent uninterrupted views of the Palouse region to the west and south. The foreground of these significant viewsheds will be impacted by the planned overpass and associated elevated highway proposed through the E-2 alignment. I consider this to be a serious long-term, adverse impact on the visual qualities associated with my property and home. The second paragraph on page 181 states "A new bridge at Eid Road would create a long-term visual effect to residences." This needs to be changed to a "major long-term negative visual impact on residents" and a more detailed analysis of what these impacts are and how they will be mitigated by ITD presented. – The noise effects analysis is not adequate and doesn't address noise concerns for rural residents. – In reviewing the noise technical report referenced in the DEIS, it seems seven noise receptors were placed in the general vicinity of the E-2 alignment as it crosses Eid Road. However, five of these locations were placed in spots that will be destroyed if the preferred alternative is constructed. Why were these receptors placed in locations that will "displaced" if the E-2 alignment is constructed? This is a major failing in the noise study and a very convenient way to justify the following statement in the first paragraph on page 186 of the DEIS "The required and optional abatement measures were not considered feasible and reasonable for the	

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			impacted receptors which were not displaced." If the receptors had been placed in locations in the Eid Road vicinity that were not being "displaced," but will for sure be impacted by the noise generated from this elevated highway, perhaps the required abatement measures would be justified. – In addition, what criteria were utilized when locations for the noise receptors were being installed in the first place? If the preferred alternative is built, it will be an elevated highway across Eid Road. Depending upon the height of this highway, the roadway will likely result in major long-term negative noise related impacts on all residences living along the first mile or so of Eid Road. The noise impacts from this alternative are not limited to homes within 300 feet of the centerline. Noise can travel great distances and drastically alter what is now a very quiet location. I see this as a major failing of the noise analysis presented in the DEIS and this should be adequately addressed and more thoroughly researched. Receptor locations must be selected based on where potential impacts from the preferred alternative will be felt, not underneath the finished roadway. – Impacts to community cohesion are inaccurate and not fully addressed in the DEIS and associated technical reports. – Page six of the Community Impact Assessment	

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			Update technical report provides the following definition for the community cohesion study: – *The community cohesion evaluation considers any changes in the pattern of social networking within a neighborhood or community, which includes splitting neighborhoods, isolating groups, generating new development, changing property values, or separating residents from community facilities. The community cohesion evaluation also includes noise and visual impacts from a project.* – The primary study cited throughout the Community Impact Assessment technical reports regarding potential impacts to community cohesion was prepared by the Citizens for a Safe Highway 95 group. This group has shown strong public support for the E-2 route, and I question whether any "studies" they have conducted can and should be viewed as unbiased. I also strongly question whether ITD should rely on the findings of any study produced by a special interest group for such a high profile project. I have lived in my home along Eid Road since 2006 and have never been contacted by any group (public or private) regarding my concerns, issues, or beliefs about any of the action alternatives reviewed in this DEIS. My home is immediately east of the overpass structure proposed under the preferred alternative, and my only contact regarding this project has been several requests from ITD to grant permission for access to	

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			my property for project related studies. The findings presented by the Citizens for a Safe Highway 95 group certainly do not reflect my beliefs regarding this issue at all. I also question whether the Citizens for a Safe Highway 95 group are experts in the field of community cohesion studies, whether they utilized a scientifically valid study design, and if their methodology and findings will hold up in court. I also question how the DEIS can state in the third paragraph on page 138 that "...none of the alternatives would cause a major disruption to community cohesion." The density of homes along the first mile or so of Eid Road makes it one, if not the most, densely occupied communities along the entire Thorncreek to Moscow route. This community is very quiet and has excellent uninterrupted views westward towards Pullman. Construction of the E-2 alternative will remove five homes, impact numerous others, and effectively cut the community in two. Using the definition provided in the Community Impact Assessment, these are exactly the kind of issues the community cohesion study was supposed to address and analyze. This is clearly not the case for the studies utilized in the analysis presented in the DEIS on which ITD is basing their findings. Implementation of the E-2 alternative would create major, long-term negative noise, visual, and community cohesion impacts for the Eid Road community. The DEIS doesn't address this concern at all.	

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			– Potential impacts to property values of rural residences from the preferred alternative are not adequately addressed. – It is stated in the last paragraph on page 143 of the DEIS, and numerous times throughout the associated technical reports, that property values will either not be impacted or may even increase throughout the project area under the E-2 alternative. I believe this to be absolutely untrue as it relates to the rural residences along Eid Road. The scenic qualities, including natural quietness and uninterrupted views to the west, provide value to my property. Placing an elevated freeway several hundred meters from my property line will not increase my property value. In fact, page 29 of the Community Impact Assessment Technical Report, Part 2 states "With respect to the proposed project, it is reasonable that by reducing access to a property, the value of that property may be reduced." This assertion has seemingly been ignored by ITD and is not discussed in any manner in the DEIS. As already discussed above, implementation of the E-2 alternative will provide no benefit, and in fact may actually reduce access for rural residents living north of Eid Road along the Thorncreek to Moscow corridor over the long-term. Therefore, I feel potential impacts to property values needs to be reassessed and adequately addressed in the DEIS. –	

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			Issues associated with impacts to vegetation and wildlife habitat are not completely accurate or adequately addressed in the DEIS. – The first sentence in the last paragraph on page 45 of the DEIS states that, "The E-2 alternative was forwarded for consideration because it had the least effect to wetlands, cultural resources and was the only alternative to not effect rare plant communities." This is absolutely not a correct statement. Table 2 on page 13 of the DEIS indicates that the E-2 route impacts 3.61 acres of wetlands while the C-3 alternative would impact less than 1 acre. The assertion that the E-2 route has no impacts to rare plant communities is also incorrect. This alternative will have the greatest impact to rare plant communities located along Paradise Ridge, and this needs to be addressed throughout the DEIS. – Impacts of the E-2 alternative on Conservation Reserve Program (CRP) lands are not adequately addressed anywhere in the DEIS either. In the Citizens for a Safe 95 attachment to the Community Impacts Assessment technical report it is noted that CRP ground "...(is) less productive and poorer quality." While this may be true on a case by case basis, as a blanket statement this represents a clear lack of understanding of the focus and purpose of the CRP Program. The CRP program was created through the 1985 farm bill and was initially focused on removing erosion prone lands from production	

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			through the establishment of natural covers. However, subsequent farm bills have refocused the CRP program on the benefits of conserving lands for wildlife habitat, wetland restoration, and other resource based projects that benefit the overall conservation and preservation of natural environments. A detailed analysis of lands enrolled in the CRP program and impacts to their associated conservation benefits for all of the alternatives must be included in this DEIS. I also strongly recommend ITD hire a reputable expert to perform this study, not rely upon the findings of studies produced by special interest groups such as Citizens for a Safe Highway 95. Impacts to the pine stands along Paradise Ridge are also not adequately or accurately addressed in the DEIS. Section 4.8.5, starting on page 167 and continuing to page 168, states that "The E-2 alternative would affect 3.9 acres...that could offer potential nesting habitat for the long-eared myotis and pygmy nuthatch..." This is an incorrect statement, as the technical report produced by Melquist (page 11) states that the pygmy nuthatch already are known to exist in this stand. Also, in that same section of the DEIS (4.8.5), ITD has concluded that the loss of this 3.9 acres of habitat is "considered minor" and that there is "an abundance of habitat nearby." Who concluded this? This is blatantly incorrect and obviously not the case. In fact, the Melquist report suggests avoiding construction along the E-2 corridor for this very	

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			reason. Why is this not reflected in the DEIS? – The last full paragraph on page 55 of the DEIS states the following: "The primary disadvantages of E-2 compared to the other alternatives are that it would be located closer to the base of Paradise Ridge which provides moderate ungulate habitat and E-2 would also affect pine stands that are potential long- eared myotis, northern alligator lizard and pygmy nuthatch habitat." While this statement is mostly accurate, it is not complete. As mentioned above, pygmy nuthatch are already known to inhabit this pine stand. The E-2 alternative will also have adverse impacts on community cohesion, viewsheds, noise, property values, access for rural residents, rare plant communities, native and restored Palouse Prairie habitats and CRP ground. In the second to last sentence of the last paragraph on page 45, ITD also states the E-2 alternative was forwarded for consideration "...because it had the least overall effects compared to the other alternatives in the eastern corridor." Perhaps a more appropriate statement regarding the E-2 alternative would be, "the E-2 alternative will result in the most long-term adverse impacts to nearly all resources of concern studied in this DEIS when compared to those alternatives forwarded for analysis." I also really question whether the E-2 alignment actually addresses the given purpose and need for this project articulated on page 2 of the DEIS. I strongly believe the E-2 route will not "improve" safety for any of the rural residents living	

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			along the Thorncreek to Moscow route. Nearly all of us will still be required to drive the old US-95 highway on a daily basis, and while overall traffic volume on the old route will be likely be greatly reduced we'll all still have to deal with all of the route's current safety issues and the accident will likely still remain high. – Based on a careful review of the DEIS and associated technical documents, I strongly support ITD's adoption of the C-3 alternative. – Rachel JT. Lyon 1090 Eid Road Moscow, Idaho (208) 669-1967	
L—74	Bill _____ Excel Transport, Inc. (owner)	Stillman	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, – As one of the owners of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of our truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly	FHWA and ITD are very sorry to hear about the death of one of you employees, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			exclaiming from the rooftops that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a long known notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss that we should allow the continued postponement of this project. In the last ten years since the project was supposed to have begun there have been 225 accidents, 186 injuries, and 9 deaths. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to invidiously attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and put the safety of the driving public to the forefront of this argument. The State needs to take whatever steps afforded to it to bring these delaying tactics to an end. – Sincerely, Bill Stillman	
L-75	Jerry – Excel Transport, Inc. (form letter)	Kriegel	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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			Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and make the safety of the driving public the most important thing in this argument. The State needs to take whatever steps available to bring these delaying tactics to an end. Sincerely, Jerry Kriegel	

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L-76	Excel Transport, Inc. (form letter)	–	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and make the safety of the driving public the most important thing in this	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-77	Michael Alan – Excel Transport, Inc. (form letter)	Haag	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-78	R--- Excel Transport, Inc. (form letter)	O---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-79	Carmen Excel Transport, Inc. (form letter)	LaMontague	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain,	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-80	Donald R. – Excel Transport, Inc. (form letter)	Spears	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-81	Neal – Excel Transport, Inc. (form letter)	M---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-82	Walter – Excel Transport, Inc. (form letter)	---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment –	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-83	Jeff – Excel Transport,	M---	Mr. Ken Helm Idaho Department of Transportation District 2	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and

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			Sincerely, Jeff [last name illegible]	
L-84	Joe – Excel Transport, Inc. (form letter)	Fiedler	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-85	Richard C. – Excel Transport, Inc. (form letter)	Haaland	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-86	Maxine – Excel Transport, Inc. (form letter)	Thompson	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-87	Donald – Excel Transport, Inc. (form letter)	M---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-88	Excel Transport, Inc. (form letter)	–	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-89	Roger – Excel Transport, Inc. (form letter)	York	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-90	Roger – Excel Transport, Inc. (form letter)	---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule

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L-91	Jack – Excel Transport, Inc. (form letter)	Linstroth	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and make the safety of the driving public the most important thing in this	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-92	Wallace B. – Excel Transport, Inc. (form letter)	G--	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-93	Ben – Excel Transport, Inc. (form letter)	V--	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-94	Shawn – Excel Transport, Inc. (form letter)	Thompson	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-95	Levi J – Excel Transport, Inc. (form letter)	Kimball	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-96	Steve – Excel Transport, Inc. (form letter)	More	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment –	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-97	B---- –	–	Mr. Ken Helm Idaho Department of Transportation	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to

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L-98	Chad C. – Excel Transport, Inc. (form letter)	Richardson	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-99	Excel Transport, Inc. (form letter)	–	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-100	Frank – Excel Transport, Inc. (form letter)	---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-101	Mark C. and Dori K – Excel Transport, Inc. (form letter)	Jackson	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-102	Jody – Excel Transport, Inc. (form letter)	Arrington	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-103	David E. – Excel Transport, Inc. (form letter)	---	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

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L-104	Gayle L. – Excel Transport, Inc. (form letter)	Painter	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process

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L-105	Jeff – Excel Transport, Inc. (form letter)	Hilbert	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and make the safety of the driving public the most important thing in this	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

#	First Name	Name	Comment	Response
			argument. The State needs to take whatever steps available to bring these delaying tactics to an end. Sincerely, [name illegible]	
L-106	Kevin R. – Excel Transport, Inc. (form letter)	Byers	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

#	First Name	Name	Comment	Response
			correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and make the safety of the driving public the most important thing in this argument. The State needs to take whatever steps available to bring these delaying tactics to an end. Sincerely, Kevin R. Byers	
L-107	Cameron – Excel Transport, Inc. (form letter)	Solberg	Mr. Ken Helm Idaho Department of Transportation District 2 2600 Frontage Road Lewiston, Idaho 83501 Re: 95 alignment – Dear Mr. Helm, As an employee of Excel Transport and a citizen that relies on highway 95 for my livelihood, I feel it is time to for the State to take an aggressive stance to dispense with the waiting and get this alignment project pushed forward. The loss of truck driver Shane Moyer's life in the most recent incident at that location is cause for loudly exclaiming that enough is enough. His wife and children are paying the ultimate price for a road alignment that has a notorious reputation. Reisenauer hill has been the cause of too many accidents, too much pain, tragedy, and loss. We should not allow the postponement of this project. The State has options for different routes, but they are being held up by a minority of folks who care more, apparently, for wild flowers and their view than they do for	FHWA and ITD are very sorry to hear about the death of your co-worker, Shane Moyer. ITD is committed to finding a resolution to the concerns in this corridor and implementing a solution. General Response Schedule describes the next steps in the environmental process and the anticipated schedule.

#	First Name	Name	Comment	Response
			people's safety. Let them explain to the families of victims to that stretch that their loved ones safety is less important than whatever it may be that is causing this group of people to attack this necessary correction. The good of the many outweigh the good of the very few and it's time to put an end to this outrageous delay and make the safety of the driving public the most important thing in this argument. The State needs to take whatever steps available to bring these delaying tactics to an end. Sincerely, Cameron Solberg	

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APPENDIX 1. KEY AGENCY CORRESPONDENCE AND FORMS

- ITD 1502 Forms
- SHPO Concurrence Letters
- Tribal MOU
- Tribal Correspondence
- USFWS Concurrence Letters
- NRCS-CSA Farmland Conversion Forms
- EPA Scoping Letter
- IDFG Correspondence
- USACE Correspondence

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ITD 1502 (Rev. 4-06)
itd.idaho.gov

Determination Of Significance And Effect

Idaho Transportation Department – State or Tribal Historic Preservation Office

Key Number	Project Number	Project Title
9294	DHP-NH-4110(156)	US-95, Thorn Creek to Moscow, Stage 1 (Alignment W-4)

District	County	Township/Range/Section
2	Latah	refer to AHSR

Clearance Authorized Without Survey ☐ PA ☐ ER ☐ Review

Field Notes: Archaeological and Historical Services (AHS)

Determination of Eligibility

	Site Numbers	Comments
☐ No Sites		
☒ Not Eligible	Temp # US95-21	Clyde & Bond Property #2
☒ Eligible	Temp # US95-22	Deesten/Davis Farmstead

Determination of Effect

	Rationale	Sites/Comments
☐ No Historic Properties Affected	☐ They are outside the project area	
	☐ They are outside impact zones	
	☐ Final project plans will avoid them	
	☐ NR character will not be changed	

☐ No Adverse Effect to Historic Properties — Sites will be affected (See Comments section below or attached explanation)

☒ Adverse Effect to Historic Properties — Sites will be affected: **Deeston/Davis Farm (Temp Site US95-22)**

Comments: **ITD District 2 proposes to improve US-95 from approximately MP 336.5 near Thorn Creek Road to MP 343.8 just south of Moscow. Plans call for realignment of the northern portion of the 7.5 mile long highway segment and widening of the southern portion. ITD District 2 has proposed three alignment options: W-4, C-3, and E-2. This Determination of Eligibility and Effect applies only to Alignment W-4.**
An intensive-complete cultural resources survey has been completed and cultural resources identified. Two sites, the Deeston/Davis Farm (Temp # US95-22) and Clyde & Bond #2 (Temp # US95-21) properties, are located within or abutting the project APE of alignment W-4. The Clyde & Bond Property #2 has been determined Not Eligible for the NRHP. The Deeston/Davis Farmstead has been determined Eligible for the NRHP and proposed project actions will result in an Adverse Effect to this historic property. If alternative W-4 is selected ITD District 2 will mitigate for the adverse effect of their actions to the Deeston/Davis Farmstead following consultation with the Idaho SHPO. With compliance to that stipulation it is recommended that this project be allowed to proceed as planned.

☐ Project will be monitored during construction due to the potential for cultural resources

Transportation Archeologist's Signature	Date
Marc Minch	December 5, 2006

SHPO or THPO 106 Comment: I have reviewed the documentation and recommendations provided by ITD and

☑ I agree with the above determination of eligibility and effect and with the conditions of compliance.

☐ I agree with the above determinations of eligibility and effect given stipulations explained below or in the attached letter.

☐ I disagree with the above determinations of eligibility and effect as explained below or in the attached letter.

State or Tribal Historic Preservation Officer's Signature	Date
Glenda L. King	1/2/07

ITD 1502 (Rev. 4-06)
itd.idaho.gov

Determination Of Significance And Effect

Idaho Transportation Department – State or Tribal Historic Preservation Office

Key Number	Project Number	Project Title
9294	DHP-NH-4110(156)	US-95, Thorn Creek to Moscow, Stage 1 (Alignment W-4)

District	County	Township/Range/Section
2	Latah	refer to AHSR

Clearance Authorized Without Survey ☐ PA ☐ ER ☐ Review

Field Notes: **Archaeological and Historical Services (AHS)**

SHPO or THPO 4(f) *De minimis* Comment (applies only when a determination of effect results in a *No Historic Properties Affected* or *No Adverse Effect* determination under Section 106):

De minimis impacts related to historic sites are defined as the determination of either "no adverse effect" or "no historic properties affected" in compliance with Section 106 of the National Historic Preservation Act (NHPA).

☑ I understand that the FHWA Division Administrator or FTA Regional Administrator may make a *de minimis* impact finding for one or more Section 4(f) resources based on Section 106 findings in this document.

Site Temp # US95-22

State or Tribal Historic Preservation Officer's Signature	Date
Glenda L. King	1/2/07

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JAN 08 2007

DIV. OF HIGHWAYS
LEWISTON, IDAHO

INFO	D2	ACT	SIG
✓	DE		
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	LRE-TPS		
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	MTCE		
	MTC FRMN		
	ALL SHEDS		
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	ALL SUPV		

D 1502a (Rev. 4-06)
d.idaho.gov

Determination Of Significance And Effect

Idaho Transportation Department – State or Tribal Historic Preservation Office

Key Number	Project Number	Project Title
9294	DHP-NH-4110(156)	US-95, Thorn Creek to Moscow, Stage 1 (Alignment C-3)

District	County	Township/Range/Section
2	Latah	refer to AHSR

Clearance Authorized Without Survey ☐ PA ☐ ER ☐ Review

Field Notes: Archaeological and Historical Services (AHS)

Determination of Eligibility

	Site Numbers	Comments
☐ No Sites		
☒ Not Eligible	57-13693; 57-13694; 57-13695; 57-13697; 57-13696; 57-13698; 10LT245; 57-13687; 57-13689; 10LT244; 57-13688	Benson House; Clyde Farm; Geffre House; Renfrew Farm; Sinclair Residence; Deeston Farm; North-South Hwy.; Carpenter Farm; Reisenauer Farm; Paulson Memorial; Jensen Farm
☒ Eligible	57-13692	Snow Farm (house & garage)

Determination of Effect

	Rationale	Sites/Comments
☒ No Historic Properties Affected	☐ They are outside the project area	
	☐ They are outside impact zones	
	☐ Final project plans will avoid them	
	☒ NR character will not be changed	57-13692 Snow Farm (house & garage)

☐ No Adverse Effect to Historic Properties Sites will be affected (See Comments section below or attached explanation)

☐ Adverse Effect to Historic Properties Sites will be affected:

Comments: **ITD District 2 proposes to improve US-95 from approximately MP 336.5 near Thorn Creek Road to MP 343.8 just south of Moscow in Latah County. Plans call for realignment of the northern portion of this highway segment and widening of the southern portion. ITD District 2 proposes three alignment options: W-4, C-3, and E-2. This Determination of Eligibility and Effect applies only to alignment C-3.**

An intensive-complete cultural resources survey of alignment C-3 has been completed and cultural resources identified. The house and garage at the Snow Farm (57-13692), was determined Eligible for the NRHP. However, proposed project actions will result in No Effect to the Snow Farm.

Nine other properties were recorded and determined Not Eligible for the NRHP. Two historic sites, North-South Hwy (10LT245) and the Paulson Memorial (10LT244) were previously determined Not Eligible by the SHPO in 2001. One previously eligible property, the Jensen Farm (57-13688), was re-evaluated in 2006 and determined to be Not Eligible based on an ITD Architectural Historian site visit and subsequent SHPO consultation.

☐ Project will be monitored during construction due to the potential for cultural resources

Transportation Archeologist's Signature	Date
Mary Minch	December 5, 2006

TD 1502 (Rev. 4-06)
itd.idaho.gov

Determination Of Significance And Effect

Idaho Transportation Department – State or Tribal Historic Preservation Office

Key Number	Project Number	Project Title
9294	DHP-NH-4110(156)	US-95, Thorn Creek to Moscow, Stage 1 (Alignment C-3)
District	**County**	**Township/Range/Section**
2	Latah	refer to AHSR
Clearance Authorized Without Survey ☐ PA ☐ ER ☐ Review		Field Notes: Archaeological and Historical Services (AHS)

SHPO or THPO 106 Comment: I have reviewed the documentation and recommendations provided by ITD and

- ☑ I agree with the above determination of eligibility and effect and with the conditions of compliance.
- ☐ I agree with the above determinations of eligibility and effect given stipulations explained below or in the attached letter.
- ☐ I disagree with the above determinations of eligibility and effect as explained below or in the attached letter.

State or Tribal Historic Preservation Officer's Signature	Date
Glenda L. Kirby	1/2/07

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JAN 08 2007
DIV. OF HIGHWAYS
LEWISTON, IDAHO

INFO	D2	ACT	SIG
✓	DE		
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	MTLS		
✓	EPS		
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	RE-A		
	RE-B		
✓	PDE		
	LRE-TPS		
	RW		
	MTCE		
	MTC FRMN		
	ALL SHEDS		
	DBM		
	ALL SUPV		

ITD 1502 (Rev. 4-06)
itd.idaho.gov

Determination Of Significance And Effect

Idaho Transportation Department – State or Tribal Historic Preservation Office

Key Number	Project Number	Project Title
9294	DHP-NH-4110(156)	US-95, Thorn Creek to Moscow, Stage 1 (Alignment E-2)

District	County	Township/Range/Section
2	Latah	refer to AHSR

Clearance Authorized Without Survey ☐ PA ☐ ER ☐ Review

Field Notes: Archaeological and Historical Services (AHS)

Determination of Eligibility

	Site Numbers	Comments
☐ No Sites		
☒ Not Eligible	Temp # US95-11; Temp # US95-1; 10LT242;	Benson Property; Fleiger Property; Trash Scatter #3
☐ Eligible		

Determination of Effect

	Rationale	Sites/Comments
☐ No Historic Properties Affected	☐ They are outside the project area	
	☐ They are outside impact zones	
	☐ Final project plans will avoid them	
	☐ NR character will not be changed	

☐ No Adverse Effect to Historic Properties Sites will be affected (See Comments section below or attached explanation)

☐ Adverse Effect to Historic Properties Sites will be affected:

Comments: **ITD District 2 proposes to improve US-95 from approximately MP 336.5 near Thorn Creek Road to MP 343.8 south of Moscow. Plans call for realignment of the northern portion of the 7.5 mile long highway segment and widening of the southern portion. ITD District 2 has proposed three alignment options: W-4, C-3, and E-2. This Determination of Eligibility and Effect applies only to alignment E-2.**
An intensive-complete cultural resources survey of alignment E-2 has been completed and cultural resources identified. Two historic properties, the Benson Property and the Fleiger Property, were recorded and determined Not Eligible for the NRHP. One historic feature, 10LT242, was previously determined Not Eligible by the SHPO in 2001. If alignment E-2 is selected the proposed project actions will result in No Effect to historic properties. In the event that cultural resources are encountered during construction, work will cease at that location and ITD HQ Cultural Resources staff will be notified immediately.

☐ Project will be monitored during construction due to the potential for cultural resources

Highway Archeologist's Signature: [signature] Date: December 5, 2006

SHPO or THPO 106 Comment: I have reviewed the documentation and recommendations provided by ITD and

☑ I agree with the above determination of eligibility and effect and with the conditions of compliance.

☐ I agree with the above determinations of eligibility and effect given stipulations explained below or in the attached letter.

☐ I disagree with the above determinations of eligibility and effect as explained below or in the attached letter.

State or Tribal Historic Preservation Officer's Signature: Glenda L. King Date: 12/29/06

IDAHO TRANSPORTATION DEPARTMENT
P.O. Box 7129
Boise ID 83707-1129

(208) 334-8000
itd.idaho.gov

December 20, 2011

Mr. Travis Pitkin
Compliance Archaeologist
Idaho State Historical Society
State Historic Preservation Office
Statehouse Mail

RE: Project No.: DHP-NH-4110(156), Key No.: 9294
US-95, Thorn Creek to Moscow, Stage 1

Dear Travis,

On December 5, 2006, the Idaho Transportation Department (ITD) submitted an Archaeological and Historic Survey Report (AHSR) for the above captioned project to the Idaho State Historic Preservation Office (SHPO) along with three Determination of Significance and Effect (ITD Form 1502) documents – one for each proposed potential project alignment. The 1502s were signed by SHPO on December 29, 2006 and concurred with ITD's finding of No Effect for alignments C-3 and E-2, and Adverse Effect for alignment W-4. At the time, ITD noted that no final alignment had been chosen for the project and therefore it was decided to wait for that decision prior to drafting and implementing a Memorandum of Agreement (MOA) for the W-4 alternative.

As the 2006 AHSR only recorded historic properties constructed in 1959 or before, it was recently decided to update the survey by recording all properties constructed between 1960 and 1970. Field work completed this summer resulted in the recordation of three (3) additional sites that fall within that date range – see attached. None were determined Eligible for listing in the National Register of Historic Places. During the same investigation, the consultant mapped, photographed, and inventoried all properties within or adjacent to the three alignment corridors constructed after 1970 – see attached.

A final alignment has yet to be identified for the project. Once chosen, that alignment will be reported to SHPO and the completion of the Section 106 process can take place. In the meantime, ITD requests the review of the attached site recordings and a letter acknowledging SHPO's concurrence with ITD's determination of National Register eligibility.

If you have any questions, please feel free to contact me at dan.everhart@itd.idaho.gov or 334-8479.

Thank you,

Dan Everhart
ITD Architectural Historian

Enclosure

www.history.idaho.gov

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C.L. "Butch" Otter
Governor of Idaho

Janet Gallimore
Executive Director

Administration
2205 Old Penitentiary Road
Boise, Idaho 83712-8250
Office: (208) 334-2682
Fax: (208) 334-2774

Membership and Fund Development
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Office: (208) 334-2682
Fax: (208) 334-2774

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Boise, Idaho 83702-7695
Office: (208) 334-2120
Fax: (208) 334-4059

State Historic Preservation Office and Historic Sites Archeological Survey of Idaho
210 Main Street
Boise, Idaho 83702-7264
Office: (208) 334-3861
Fax: (208) 334-2775

Statewide Sites:
- Franklin Historic Site
- Pierce Courthouse
- Rock Creek Station and
- Stricker Homesite

Old Penitentiary
2445 Old Penitentiary Road
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Fax: (208) 334-3225

Idaho State Archives
2205 Old Penitentiary Road
Boise, Idaho 83712-8250
Office: (208) 334-2620
Fax: (208) 334-2626

North Idaho Office
112 West 4th Street, Suite #7
Moscow, Idaho 83843
Office: (208) 882-1540
Fax: (208) 882-1763

June 10, 2015

Dan Everhart
Architectural Historian
Idaho Transportation Department
Boise, Idaho

Re: Project No.: DHP-NH-4110(156), Key No.: 9294
US-95, Thorn Creek to Moscow, Stage 1 – Addendum A
Idaho SHPO Review No.: 2007-98

Dear Dan,

On April 22, 2015, the Idaho State Historic Preservation Office (SHPO) received an Addendum from the Idaho Transportation Department (ITD) for the project mentioned above. In 2006, ITD and SHPO concurred that alignments C-3 and E-2 would have result in no effect to historic properties, and alignment W-4 would have result in an adverse effect to historic properties. Now, the project proposes changes to realign a segment of the W-4 alignment to avoid the eligible historic properties and therefore avoid an adverse effect determination. ITD suggests the proposed new alignment of W-4 to have a No Effect to Historic Properties determination. ITD also proposes that if alignment W-4 is chosen the appropriate archaeological investigations will be conducted before any ground disturbing activities commence.

The SHPO concurs and finds a determination of **No Effect to Historic Properties** for this addendum; *overall, the project will have No Effect to Historic Properties.* Please, consider this letter the official Idaho SHPO Section 106 comment for this addendum.

If you have any further questions or comments, please contact me at jamee.fiore@ishs.idaho.gov or (208) 334-3861 x 101.

Thank you for consulting with us,

Jamee N. Fiore, MHP
Historic Preservation Review Officer
Idaho State Historic Preservation Office

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Moscow, Idaho 83843
Office: (208) 882-1540
Fax: (208) 882-1763

March 8, 2012

Dan Everhart
Architectural Historian
Idaho Transportation Department
Statehouse Mail

RE: Goodman Oil (HR 02); US-95, Thorn Creek to Moscow, Stage 1; DHP-NH-4110(156), Key 9294.

Dear Dan,

This letter is in response to your email requesting further comment about our recent determination of eligibility for the Goodman Oil Company gas station above. I have discussed our eligibility assessment for the property with our architectural historians and we offer the following in support of our determination.

In essence, the building meets Criterion C as an excellent example of "mid-century modern" architectural design – the octagonal/round form, the large glass exposure, flat roof, metal components, and cinderblock walls all are distinctive characteristics of the type, period, and method of construction of the genre. Furthermore, although a comprehensive survey of gas stations has not yet been conducted in Idaho, it is clear that this example appears to be a rare survivor of the property type (no other similar examples are known or recorded in the state inventory).

We appreciate your cooperation. If you have any further questions, please contact us.

Sincerely,

Travis Pitkin, M.S.
Archaeologist

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Governor of Idaho

Janet Gallimore
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North Idaho Office
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Moscow, Idaho 83843
Office: (208) 882-1540
Fax: (208) 882-1763

January 23, 2012

Dan Everhart
Architectural Historian
Idaho Transportation Department
Statehouse Mail

RE: US-95, Thorn Creek to Moscow, Stage 1
DHP-NH-4110(156), key 9294

Dear Dan,

Thank you for sending additional information regarding the project referenced above. Three additional properties were recorded that were not addressed in the previous 2006 cultural resources survey report.

We agree the Ziegler House (HR 01) and the 2305 S. Main St. property (HR 16) are both Not Eligible. However, we do feel the 1963 commercial structure on the Goodman Oil Company property (HR 02) is National Register Eligible under Criterion C (Consideration g.). We feel the structure is of exceptional significance exhibiting a very rare design for Idaho.

The Goodman Oil Company property (HR 02) appears to be situated near the northern confluence of the C3, E2, and W4 alignment corridors. The location of this property may require a change in project finding for C3 or E2 alternates. The W4 alternate has previously been determined to adversely affect historic properties. We understand a final alignment has not yet been identified, and look forward to receiving additional information regarding project actions when an alignment is chosen.

We appreciate your cooperation. If you should have any questions regarding these comments please feel free to contact me at 208-334-3847 or travis.pitkin@ishs.idaho.gov.

Sincerely,

Travis Pitkin, M.S.
Archaeologist

Historical Society is an Equal Opportunity Employer.

January 28, 2002

Mr. Rob Roy Smith
Staff Attorney/Policy Analyst
Nez Perce Tribal Executive Committee
P.O. Box 305
Lapwai, ID 83540-0305

Re: Nez Perce Tribe/ITD MOU

Dear Mr. Smith:

Enclosed is the fully executed original Memorandum of Understanding between the Nez Perce Tribe and the Idaho Transportation Department for your records. We have retained copies of the MOU for our Lewiston and Boise offices.

Sincerely,

ORIGINAL SIGNED BY:

JOAN THOMPSON
District Business Manager

JT:jw\2-0039\z:\Admin\OM\WRDFILES\ADM\Nez Perce Tribe MOU.doc
Enclosure

bcc: LEGAL w/enc.
DE w/enc.
File w/enc.

Nez Perce

TRIBAL EXECUTIVE COMMITTEE
Office of Legal Counsel
P.O. BOX 305 • LAPWAI, IDAHO 83540-0305 • (208) 843-7355
FAX (208) 843-7377

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JAN 17 2002
ITD
LEGAL SECTION

January 15, 2002

Tim Thomas, Esq.
Idaho Transportation Legal Department
PO Box 7129
Boise, Idaho 83707

RE: Nez Perce Tribe/ ITD MOU

Dear Tim:

Enclosed is a signed original copy of the *Memorandum of Understanding Between the Nez Perce Tribe and the Idaho Transportation Department*. As per our conversation, it is my understanding that you will have the appropriate individuals sign and subsequently distribute copies of the MOU.

It has been a pleasure working with both you and Mr. Bywater in finalizing this agreement. The Tribe looks forward to continuing our positive working relationship with the Idaho Transportation Department.

Sincerely yours,

Rob Roy Smith
Staff Attorney/ Policy Analyst

MEMORANDUM OF UNDERSTANDING

between

THE NEZ PERCE TRIBE

and

THE IDAHO DEPARTMENT OF TRANSPORTATION

for

COORDINATION AND CONSULTATION ON TRANSPORTATION PROJECTS AND RESOURCE MANAGEMENT ISSUES

This Memorandum of Understanding ("MOU") is made between the Nez Perce Tribe ("TRIBE"), a federally recognized sovereign Indian Tribe, and the Idaho Department of Transportation ("ITD").

ARTICLE I. GOVERNMENT-TO-GOVERNMENT CONSULTATION

A. Purpose.

The purpose of this Agreement is to establish a procedure under which the TRIBE and the ITD will consult concerning construction, repair or maintenance projects ("projects") undertaken by the ITD within the Nez Perce Reservation, ceded territories and traditional use areas (collectively "Reservation"). For the purposes of this MOU, consultation is a multi-step process involving the TRIBE and ITD, leading to informed decision-making that adequately addresses the legitimate rights and interests of the TRIBE and the interests, needs and obligations of ITD. A first step towards meaningful consultation includes open, two-way information sharing early in the decision-making process and the opportunity for technical, legal and policy review and input. Consultation incorporates such input into the decision-making process in a manner that addresses the legitimate rights and interests of both parties.

B. Responsible officials.

1. The District Engineer for District 2 of the ITD shall be the responsible official for the purpose of consulting with the TRIBE on a government-to-government level for ITD projects within the Reservation. A representative from the State Transportation Board may attend such consultations when available.

2. The Chairman of the Nez Perce Tribal Executive Committee or his designee shall be the responsible Tribal government official for the purpose of consulting with ITD on a government-to-government level with respect to ITD projects.

3. The District Engineer shall designate ITD representatives responsible for maintaining contact and free flow of information in a continuing working relationship with the Tribe.

4. The Chairman of the Nez Perce Tribal Executive Committee shall designate the Tribal representative and key staff responsible for maintaining a continuing working relationship with ITD.

C. Consultation between responsible officials.

1. The parties shall initiate consultation at least once every three (3) months: (a) to discuss all proposed and ongoing projects within the Reservation, (b) to identify potential effects on tribal interests, and (c) to resolve other transportation or resource management issues of concern to either party.

2 Either party may initiate consultation for the purposes of entering into additional cooperative agreements with respect to specific projects.

3. The District Engineer shall initiate consultation when significant changes to projects that the Tribe has already commented on are being considered.

4. Consultation for other purposes may be initiated by either party.

ARTICLE II. PROJECT PLANNING AND COORDINATION

A. ITD responsibilities.

1. The District Engineer or his designee shall enter into discussions with the TRIBE to determine the level of coordination appropriate for specific projects within the Reservation at the commencement of planning with respect to the project.

2. Solicit comments from the TRIBE for projects within the Reservation.

3. Provide the TRIBE with a reasonable opportunity to review and comment on all projects proposed within the Reservation.

4. Work with the TRIBE on the proposed project before the project is opened to comments from the general public to alleviate tribal concerns prior to the comment phase.

5. Solicit comments from the TRIBE to help identify any potential impacts of ITD projects on natural resources, cultural resources or sacred sites, as well to help develop any plans to avoid or mitigate such adverse impacts; and incorporate the comments of the Tribe to the fullest extent practicable as they relate to the protection or mitigation of adverse impacts to such resources and sites.

B. TRIBE responsibilities.

1. Identify tribal representatives to work on an on-going basis with ITD representatives concerning ITD projects within the Reservation and distribute ITD project announcements to appropriate tribal staff.

2. Provide review comments to the ITD within 30 calendar days from the date of receipt of the notice, as otherwise specified in the notice, or as agreed.

3. Assist in resolving conflicts or potential effects identified during the tribal review of the proposal notices.

4. Inform the ITD of any activities on tribal lands that could affect or influence initiation or implementation of an ITD project.

5. Identify projects of mutual interest and coordinate with other entities to seek cooperative agreements.

C. Mutual responsibilities.

1. Set the date, time, and place for the quarterly consultation meeting, and other consultations as mutually agreed to.

2. At least one week prior to the quarterly consultation meeting, prepare an agenda identifying specific questions, issues of concern, and ongoing or proposed cooperative programs to be addressed.

3. Where appropriate, prepare and submit for review prior to the meeting draft cooperative agreements for discussion, negotiation and signature at the meeting.

4. Diligently work toward reaching mutually agreeable solutions in cases of conflict.

5. Work cooperatively to find creative solutions and secure tribal participation in projects, where appropriate.

ARTICLE III. GENERAL TERMS AND CONDITIONS

A. Direct contacts between the ITD and the TRIBE are in no way limited by this MOU. Such contacts are essential to promote more effective communication, coordination and consultation. The Parties recognize that each party reserves all rights, powers, and remedies now or hereafter existing in law or equity, by statute, treaty or otherwise. Nothing in this MOU shall be construed as a waiver of sovereign immunity of the TRIBE or the State of Idaho. By entering into this MOU, the Parties reserve, and do not waive, any jurisdictional or other claims authorized by law. This MOU is intended solely for the purpose of facilitating intergovernmental cooperation between the Parties and creates no rights in third parties or the right to judicial review.

B. Failure of the TRIBE to respond to any notification above shall in no way be considered a waiver or abandonment of any treaty or treaty-related right with respect to the activity or project referred to in the notification.

C. Amendments, supplements or revisions to this MOU may be proposed by any Party to the agreement and shall become effective upon formal approval by both Parties.

D. This agreement will become effective on the date of the latest signature as evidenced below.

E. Either party may terminate this agreement by providing written notice to the other party. The agreement will terminate thirty (30) days after a party receives such written notice.

Nez Perce Tribe
By:

Samuel N. Penney — 1-14-02

Samuel N. Penney (date)
Chairman

Arthur M. Taylor Jr. — 01-14-02

Arthur M. Taylor, Jr. (date)
Secretary

Idaho Department of Transportation

By:

Jim Carpenter
District Engineer, ITD District Two

1/23/02
(date)

Approved as to form:

Stephen A. Bywater
Deputy Attorney General
Idaho Transportation Department

NEZ PERCE TRIBE CONTACT LIST

Issue	Name	Telephone
Cultural Resources	Kevin Cannell	(208) 843-7313
Water Quality	Bobby Hills	(208) 843-7368
Noxious Weeds/Land Ownership	Jack Bell	(208) 843-7392
Transportation Planning	Della Cree	(208) 843-7324
Fishery Habitat/Restoration	Emmit Taylor	(208) 843-7144
Forestry Issues	John DeGroot	(208) 843-7328
Wildlife	Keith Lawrence	(208) 843-7372
General Issues	Rob Roy Smith	(208) 843-7377

Zach Funkhouser

File:DHP-NH-4110(156)

U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
IDAHO DIVISION
3050 LAKEHARBOR LANE, SUITE 126
BOISE, IDAHO 83703-6217
208-334-1843
Idaho.FHWA@fhwa.dot.gov

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DIV. OF HIGHWAYS
LEWISTON, IDAHO

July 14, 2004

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Reply To: HFO-ID.1

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	DIV ADMIN
	ASST DIV ADMIN
	TRANSP ENG
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	BR/SAFETY ENG
	FINAN MGR
	FINAN SPEC
	FINAN ASST
	STAFF ASST
	SUPP SERV CLK
	COMP SPEC
	FIELD OPS ENG
	OPS ENG 1
	OPS ENG 2
	OPS ENG 3
	OPS ENG 4
	PDP
	FILES

Mr. Samuel Penney
Tribal Chair
Nez Perce Tribe
PO Box 365
Lapwai, ID 83540

RE: Project DHP-NH-4110(156), Key #9294; US-95, Thorn Creek Road to Moscow

Dear Mr. Penney:

The above referenced project is being developed to improve the level of service and safety of US-95 from MP 337.2 at Thorn Creek Road, north of Genesee, to MP 344.0 south of Moscow in Latah County. The Idaho Transportation Department (ITD) District 2 Office in Lewiston is developing the project in cooperation with the Federal Highway Administration (FHWA). The project location is shown on the enclosed maps.

The purpose of this letter is to initiate a government-to-government relationship with the Nez Perce Tribe and to gain your input regarding this project. The FHWA's guidance on consultation with Tribal Governments on Federal-aid projects is based on the November 6, 2000 Executive Order: Consultation and Coordination with Indian Tribal Governments.

We are aware that Mr. Jim Carpenter, ITD District 2 Engineer, meets with you on a quarterly basis to brief you on projects that may be of interest to you. We would be pleased to have an FHWA representative accompany Mr. Carpenter to a forthcoming meeting to formalize our government-to-government relationship with the Tribe.

ITD District 2 is beginning the development of an Environmental Impact Statement (EIS) for this project. An archeological and historical inventory of the project area will be conducted. Under the Federal regulations of Section 106, Section 4(f) and NEPA, consideration of the possible effect of the project on

Native American Traditional Cultural Properties (TCPs) and Sacred Sites that are within or in close proximity to the project area is required. We are very interested in input from the Tribe regarding any concerns for TCPs or Sacred Sites in this project area.

For day-to-day activities and normal consultations with the Tribe, FHWA relies on ITD District 2 in Lewiston. ITD is responsible for working with the Tribe to develop information on Tribal project concerns. Mr. Jim Carpenter, ITD District 2 Engineer, may be contacted at (208) 799-4200.

Since FHWA is ultimately responsible for ensuring compliance with Federal law, including Tribal coordination, please contact Edwin Johnson, FHWA Operations Engineer, at (208) 334-9180, ext. 116, if you have any specific questions or concerns, and if you would like to meet with an FHWA representative at your quarterly meeting with ITD District 2. Please furnish us the name and telephone number of the Tribe's designated contact person for this project.

Thank you for your attention to this matter.

Sincerely,

Renee Sigel

Renee Sigel
Assistant Division Administrator

Enclosure

Hard Copy cc: Mr. Jim Carpenter, ITD District 2 Engineer,
Mr. Dennis Clark, ITD Environmental Program Manager,
Mr. Zach Funkhouser, District 2 Sr. Environmental Planner

ebj(let)-Project DHP-NH-4110(156), Key #9294.doc

File

February 23, 2012

Mr. Brooklyn Baptiste, Chair
Nez Perce Tribe Executive Committee
P.O. Box 305
Lapwai, ID 83540

Re: March 1, 2012, Quarterly MOU Meeting
Between the Nez Perce Tribe (NPT) and
The Idaho Transportation Department (ITD)

Dear Chair Baptiste:

In accordance with the provisions of our MOU, I am forwarding you the items that we would like to have placed on the agenda:

Federal and State Funded Projects/
Government to Government Coordination

Projects under contract on the Reservation:

	Award or Bid Opening	*Prime Contractor*
• US-95, S. of Cottonwood to S. of Ferdinand	10/18/11	Poe Ashalt Paving
• US-95 Lapwai Cr. Bridges	04/05/11	Wadsworth Brothers, Inc.
• SH-162, Nezperce to Four Corners	08/30/11	Knife River Construction
• US-95, Spaulding Br. Rehab	09/26/11	Penhall Construction
• SH-162, Four Corners to MP 13.1	11/08/11	Knife River Construction
• US-12 Orofino to Greer	01/10/12	Valley Paving, Inc.
• SH- 162, Red Rock Rd to Kamiah	03/06/12	TBD

Projects under construction near the Reservation:

	Award	*Prime Contractor*
• US-95, FY12 Rockfall Mitigation	08/02/11	Midwest Rockfall, Inc.

Continued...

Projects being developed within the Reservation:

	Complete Design
• US-95, End of Concrete to Ferdinand	2016
• SH-162 MP 13 to Redrock Road	2013
• US-95, Turn bays (Division & Old SH-7)	2013
• SH-7, Gilbert Grade	2014
• SH- 64, Kamiah Grade	2014
• US-12 Greer to Kamiah, Rockfall	2014
• SH-11, Greer Bridge Painting	2013
• US-95, Spaulding Bridge, Scour Mitigation	2014
• US-95 Concrete Slab Repair	2014

Projects being developed near the Reservation:

• MP 81 to Syringa, US-12	2013
• Thorn Cr. Rd to Moscow, US-95	2016
• Crooked Fork River Bridge, US-12	2013

Discussion Items:

- Programmatic Agreement on Cultural Clearances
- Left Turn bay Study
- Clearwater River Casino Interchange
- Joint Rest Area in Winchester

If you have any questions on these subjects or would like us to be prepared to address additional topics, please call me at 799-5090. We look forward to another productive and informative meeting with the NPT.

Sincerely,

ORIGINAL SIGNED BY:

JAMES F. CARPENTER, P.E.
District Engineer

JFC:kr/Z:\ADMIN\OM\WRDFILES\Office\nez perce tribe 2-23-12.docx

cc: Ms. Jan Vassar, Idaho Transportation Board
Ms. Rachel Edwards, Nez Perce Tribe
bcc: DE2 DEM2 PDE2 DTE2 RE2 A RE2 B EPS TPS2
SHA (Münch)

file

December 19, 2006

Mr. Kevin Cannell, THPO
Nez Perce Tribe
P.O. Box 365
Lapwai, ID 83540

Re: Project No. DHP-NH-4110(156); Key No. 9294
Throncreek Road to Moscow
Archeological and Historic Survey Report

Dear Mr. Cannell:

As per your request, enclosed is the referenced report for the Idaho Transportation Department's Thorncreek Road to Moscow project.

If you have questions or concerns regarding this report, please feel free to contact me at 799-5090.

Sincerely,

ORIGINAL SIGNED BY:

ZACHARY A. FUNKHOUSER
Environmenal Planner Senior

ZAF:ss/z:\Admin\OM\WRDFILES\ADM\cannell9294hist.survey.doc
Enclosure

bcc: ENV (CLARK) DE2 PDE2 EPS

FW: Thorncreek to Moscow and Silene

From : Shawn Smith <Shawn.Smith@itd.idaho.gov> Thu, Apr 12, 2012 10:06 PM
Subject : FW: Thorncreek to Moscow and Silene
To : Michelle Anderson <anderenv@q.com>

FYI

From: Clay_Fletcher@fws.gov [mailto:Clay_Fletcher@fws.gov]
Sent: Thursday, April 12, 2012 2:23 PM
To: Shawn Smith
Subject: Thorncreek to Moscow and Silene

Hi Shawn - I'm a little confused about the confusion! Yes, Zach proposed the mitigation for the Top of Lewiston Hill to Genesee Silene incident. He also saw the proposed actions as a conservation action under sec 7(a)(1) for the Thorncreek to Moscow project. Specifically, in his Addendum to the BA for this Lewiston Hill project in Proposed Mitigation Item #4, he states :

"In addition to completing mitigation actions for the impact to a Spalding's catchfly location within the project boundaries of the Top of Lewiston Hill to Genesee project, ITD also intends to acknowledge this project as mitigation for the Thorncreek Road to Moscow project under Section 7(a)1 of the ESA. The location of Renfrew easement area is within the study area for the Thomcreek Road to Moscow project and the Jensen site is adjacent to the action area. This would complete mitigation actions planned for the Spalding's catchfly impact at the Mervyn Farm's site."

As far as the Service is concerned, there was no required mitigation for the Thorncreek project. The mitigation was for the Lewiston Hill mishap but was going to be implemented in the "study area" for the Thorncreek project. In my letter of concurrence for the Thorncreek project, I included the Zach's proposed "mitigation" because it would benefit Spalding's. The NLAA determination would stand without the "mitigation."

ITD has made a good faith effort to accomplish the proposed mitigation even though the results were not quite all that we were hoping for. We are still hoping additional protective measures for Spalding's can be accomplished through formal or informal conservation easements when the opportunity is available.

If it would help for Mark and me to have a conversation about this with FHWA, please let me know.

Thanks and let me know if you have questions or need anything additional.

Clay

U.S. Fish and Wildlife Service
1387 S. Vinnell Way, Room 368
Boise, ID 83709
(208) 378-5256; fax (208) 378-5262
clay_fletcher@fws.gov

FW: FWS File 912.0301 2007-I-0368 Concurrence Letter

From : Ken Helm <Ken.Helm@itd.idaho.gov> Wed, Dec 07, 2011 09:05 AM
Subject : FW: FWS File 912.0301 2007-I-0368 Concurrence Letter 1 attachment
To : 'anderenv@q.com' <anderenv@q.com>

This was the response back from FWS. Ken

From: Clay_Fletcher@fws.gov [mailto:Clay_Fletcher@fws.gov]
Sent: Friday, December 02, 2011 8:59 AM
To: Shawn Smith
Cc: Mark_Robertson@fws.gov; Sue Sullivan; kyle.holman@dot.gov; Victoria Jewell Guerra; Ken Helm
Subject: Re: FWS File 912.0301 2007-I-0368 Concurrence Letter

Hi Shawn - Given that you describe no changes to the project or anticipated effects to the Spalding's catchfly as detailed in your original project BA, the Service agrees with the ITD's conclusion that our 2007 letter of concurrence remains valid. Reinitiation of consultation is not warranted at this time. However, if your proposed action is modified, environmental conditions change, or additional information becomes available regarding potential effects on listed species, you should verify that your conclusions are still valid.

In addition, our 2007 consultation included commitments by the ITD to proactively work towards the conservation of Spalding's catchfly and mitigate damage to an existing population (Mervyn Farm site) that occurred during construction activities associated with the Top of Lewiston Hill to Genesee project. These commitments included acquiring a conservation easement on the Renfrew property (within the Thorncreek to Moscow action area) to protect a small catchfly population and growing out and transplanting catchfly plants on the Jensen property (adjacent to the Thorncreek to Moscow action area), the Renfrew property, and the Mervyn Farm site (after rehabilitating and fencing the site). I assisted with seed collection in 2007 and know seeds were germinated at the Palouse Land Trust facility, but haven't heard anything additional in quite some time. Could you please provide me with an update on the status of these conservation efforts?

Thank you.

Clay

U.S. Fish and Wildlife Service
1387 S. Vinnell Way, Room 368
Boise, ID 83709
(208) 378-5256; fax (208) 378-5262
clay_fletcher@fws.gov

Shawn Smith
<Shawn.Smith@itd.idaho.gov>

12/01/2011 03:43 PM

To "Mark Robertson (Mark_Robertson@fws.gov)" <Mark_Robertson@fws.gov>, Sue Sullivan <Sue.Sullivan@itd.idaho.gov>
cc "'kyle.holman@dot.gov'" <kyle.holman@dot.gov>, Victoria Jewell Guerra <Victoria.JewellGuerra@itd.idaho.gov>, Ken Helm <Ken.Helm@itd.idaho.gov>
Subject FWS File 912.0301 2007-I-0368 Concurrence Letter

Re: US-95Thorncreek Road to Moscow Highway Construction Project
(Key #9294)-- Latah County, Idaho-- Concurrence
File #912.0301 2007-I-0368

Dear Mark,

In anticipation of submittal of a Draft Environmental Impact Statement (DEIS) for the above referenced project, ITD is currently reviewing and updating the previous ESA consultation for the above referenced project. Concurrence on the original Biological Assessment for the project was received from your office April 12, 2007 that the project is not likely to adversely affect Spalding's catchfly (Silene spaldingii)

As of the latest United States Fish and Wildlife Service Species list dated August 17, 2011 the only changes to listed species within Latah County, ID is the removal of the Gray wolf, (Canis lupus) which was listed as experimental non-essential.

At the time of this writing the Idaho Transportation Department has not changed the original proposed highway design and are still evaluating the three proposed alignments your office consulted on in 2007. Based on this information and the lack of substantive species change there should be no difference in the level of effect to listed species determined from the original B.A. for this project. All other components of the existing consultation remain the same and therefore, ITD believes the determination for Spalding's catchfly of "not likely to adversely affect" is still valid as originally intended and reinitiating consultation is not warranted at this time.

Shawn W. Smith

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Snake River Fish and Wildlife Office
1387 S. Vinnell Way, Room 368
Boise, Idaho 83709
Telephone (208) 378-5243
http://IdahoES.fws.gov

RECEIVED

APR 16 2007

DIV. OF HIGHWAYS
LEWISTON, IDAHO

APR 12 2007

Dennis Clark
Environmental Section Manager
Idaho Transportation Department
P.O. Box 7129
Boise, Idaho 83707-1129

Subject: US-95 Thorncreek Road to Moscow Highway Construction Project (Key #9294)—Latah County, Idaho—Concurrence
File #912.0301 2007-I-0368

Dear Mr. Clark:

This letter transmits the Fish and Wildlife Service's (Service) concurrence on the effects of the Thorncreek Road to Moscow Highway Construction Project on species listed under the Endangered Species Act of 1973, as amended. In a letter dated and received by the Service on March 16, 2007, the Idaho Transportation Department (Department) requested concurrence with the determination, documented in your Biological Assessment (Assessment), that the project is not likely to adversely affect Spalding's catchfly (*Silene spaldingii*).

The Department proposes to widen and straighten US-95, from approximately one mile south of Moscow to approximately eight miles north of Genesee, encompassing 6.5 miles of the existing highway corridor. Three alternate alignments are proposed within the two mile wide project area. None of the proposed alignments is further than 1.5 miles away from the existing US-95 right-of-way. The Department has not chosen a final alignment from among those proposed, so the action area for section 7 purposes is equivalent to the project area (i.e., encompasses all three proposed alignments).

The Department proposes to widen the existing two-lane highway to a four-lane divided highway, and realign the road as necessary to meet a 70 miles per hour design speed criteria within the project area. Standard best management practices and design criteria will be used to minimize resource impacts. Refer to the Assessment for a complete project description including design criteria.

Our concurrence that the project is not likely to adversely affect Spalding's catchfly is based on the following rationales as presented in the Assessment.

TAKE PRIDE IN AMERICA

1. Surveys of suitable habitat in the project area found only one Spalding's catchfly occurrence consisting of six plants. No Spalding's catchfly plants were found within the footprint of any of the three alignments, and therefore, no direct effects to Spalding's catchfly are anticipated.

2. The project may indirectly affect Spalding's catchfly by increasing the risk of weed establishment in areas up to one kilometer away from disturbed areas associated with highway construction. All of the proposed alignments have the potential to indirectly affect the known occurrence of Spalding's catchfly and Palouse prairie remnants capable of supporting the catchfly, although within the zone of potential weed establishment, the known occurrence is still more than 1,000 feet from the closest alignment. This distance, combined with the Department's roadsides management direction, reduces the risk of weed establishment resulting from highway construction and use. Furthermore the Department is responsible for controlling and managing noxious weeds on all property under its jurisdiction.

3. The Department will benefit Spalding's catchfly by working proactively to conserve and restore Spalding's catchfly in the project area. These efforts will include establishing a conservation easement to protect the known occurrence, conducting additional surveys for Spalding's catchfly, and working to establish additional catchfly populations (seed collection, propagation, and planting out in suitable habitat).

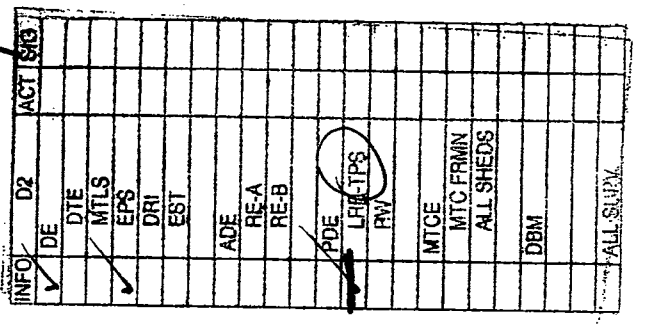
This concludes informal consultation on the proposed project under section 7 of the Act. If the proposal addressed in this letter is modified, environmental conditions change, or additional information becomes available regarding potential effects on listed species, you should verify that your conclusions are still valid.

Thank you for your interest in the conservation of threatened and endangered species. Please contact Clay Fletcher at (208) 378-5256 if you have questions concerning these comments.

Sincerely,

for Jeffery L. Foss, Field Supervisor
Snake River Fish and Wildlife Office

cc: ITD, Lewiston (Smith)
IDFG, Lewiston (Hennekey)



U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service

NRCS-CPA-106
(Rev. 1-91)

FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS

PART I *(To be completed by Federal Agency)*	3. Date of Land Evaluation Request **12/3/06**	4. Sheet **1** of **1**
1. Name of Project **Thorncreek Rd. to Moscow ph 2**	5. Federal Agency Involved **FHWA**	
2. Type of Project **Transportation**	6. County and State **Latah County, Idaho**	
PART II *(To be completed by NRCS)*	1. Date Request Received by NRCS **11/20/06**	2. Person Completing Form **Ed Haagen**
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form). YES ☑ NO ☐	4. Acres Irrigated **0**	Average Farm Size **494**
5. Major Crop(s) **Winter Wheat**	6. Farmable Land in Government Jurisdiction Acres: %	7. Amount of Farmland As Defined in FPPA Acres: **266,300** % **38**
8. Name Of Land Evaluation System Used **LESA**	9. Name of Local Site Assessment System	10. Date Land Evaluation Returned by NRCS **11/27/06**

PART III *(To be completed by Federal Agency)*	Maximum Points	Alternative Corridor For Segment ____ Corridor W4	Corridor C3	Corridor E2	Corridor
A. Total Acres To Be Converted Directly		159	102	158	
B. Total Acres To Be Converted Indirectly, Or To Receive Services		0	0	0	
C. Total Acres In Corridor		159	102	158	
PART IV *(To be completed by NRCS) Land Evaluation Information*					
A. Total Acres Prime And Unique Farmland		47	25	51	
B. Total Acres Statewide And Local Important Farmland		105	70	95	
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted		0	0	0	
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value		0	0	0	
PART V *(To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)*		79	79	79	
PART VI *(To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))*					
1. Area in Nonurban Use	15	14	14	14	
2. Perimeter in Nonurban Use	10	9	8	10	
3. Percent Of Corridor Being Farmed	20	19	17	11	
4. Protection Provided By State And Local Government	20	20	20	20	
5. Size of Present Farm Unit Compared To Average	10	10	10	10	
6. Creation Of Nonfarmable Farmland	25	10	13	17	
7. Availablility Of Farm Support Services	5	5	5	5	
8. On-Farm Investments	20	20	20	20	
9. Effects Of Conversion On Farm Support Services	25	0	0	0	
10. Compatibility With Existing Agricultural Use	10	3	2	4	
TOTAL CORRIDOR ASSESSMENT POINTS	160	110	109	111	
PART VII *(To be completed by Federal Agency)*					
Relative Value Of Farmland (From Part V)	100	79	79	79	
Total Corridor Assessment (From Part VI above or a local site assessment)	160	110	109	111	
TOTAL POINTS *(Total of above 2 lines)*	260	189	188	190	

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES ☐ NO ☑

5. Reason For Selection:

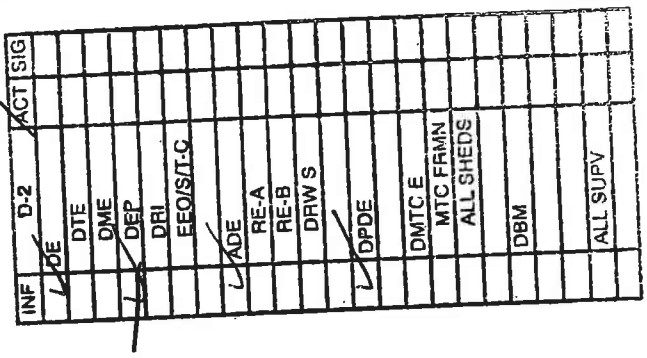
See Attached Remarks For Each Alternative

Signature of Person Completing this Part: **Ed Haagen** DATE **12/3/06**

NOTE: Complete a form for each segment with more than one Alternate Corridor

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

March 8, 2004



Reply To
Attn Of: ECO-088

Mr. Russell L. Jorgenson
Federal Highway Administration
Idaho Division Office
3050 Lakeharbor Lane, Suite 126
Boise, Idaho 83703

RECEIVED
MAR 12 2004
DIV. OF HIGHWAYS
LEWISTON, IDAHO

Ref: 03-084-FHA

Dear Mr. Jorgenson:

The Environmental Protection Agency (EPA) has received the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the proposal to improve **US 95 Thorn Creek to Moscow, Idaho**. While we intend to participate in the resource agency scoping meeting and field trip planned for this spring as well as subsequent opportunities for interaction, we feel there is value in offering comments prior to the meeting, at the earliest possible stage, to enable project proponents to incorporate them into project planning. These comments are submitted pursuant to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The following is not a comprehensive list of issues that should be addressed in the environmental analysis, but it includes those that we think should be emphasized based on the limited information we currently have about the project and the affected area:

High value habitats – need for avoidance, minimization of impacts and context sensitive design. From phone conversation and the Notice of Intent we understand that the subject corridor for this EIS is a 6.1 to 7.4 mile subset of the larger 20.8 mile corridor studied in the *Top of Lewiston Hill to Genesee and Genesee to Moscow Environmental Assessment (EA)*. While we do not have a description of the subject segment for this EIS, we anticipate that high value Palouse prairie habitat, wetlands, and streams are in the project area and may be affected by the proposed project. The EA (p. 22) states that remnants of Palouse prairie occur mostly on steep slopes and in marshy areas. An occurrence of Spalding's catchfly (*Silene spaldingii*), proposed as threatened under the Endangered Species Act (ESA), has been documented in habitat surveys for the EA. According to the U.S. Fish and Wildlife Service (USFWS), the threatened Ute ladies' tresses (*Spiranthes diluvialis*), and the threatened water howellia (*Howellia aquatillis*), may also occur in the EA project area. White tail deer, chukar, Hungarian partridge, bobwhite and California quail, waterfowl, and several species of concern, including ring-necked snake, northern alligator lizard, wolverine, fisher, long-eared myotis, fringed myotis, Northern goshawk, Northern pygmy owl, and pygmy nuthatch also occur in the EA project area.

Based on the above information, it will be important to use extraordinary sensitivity, or Context Sensitive Design, in the design and placement of the roadway to ensure that the natural values and functions of the area, as well as any identified social, cultural, historical, and/or scenic values, remain intact. One of the most critical aspects of applying context sensitive design is the

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preservation of ecological connectivity (see explanation below). This can best be achieved using avoidance and minimization of impacts – which are the first and second priorities for mitigating impacts – through sensitive planning, alternatives analysis, siting and design. Compensatory mitigation is appropriate only for truly unavoidable impacts that cannot be further addressed through improved siting and design when an action alternative is selected.

We anticipate that avoidance of sensitive, rare, and/or high value terrestrial and aquatic habitats will be the most significant environmental need for this proposed project. Maintaining habitat connectivity and providing for safe and effective movement of wildlife and aquatic species will be a necessity.

Ecological connectivity. The roadway alternatives will, to varying degrees, potentially fragment habitats, create a barrier to wildlife movement, result in wildlife roadkill, and sever other aspects of ecological connectivity in the project area. The EIS should provide an analysis of the alternatives with respect to ecological connectivity needs and impacts, and include adequate mitigation measures to avoid and minimize the impacts. The EIS should include this analysis and propose mitigation for both terrestrial and aquatic ecosystem processes, habitats, and species in consultation with the resource agencies.

For terrestrial species, this will involve identifying habitat linkages (movement corridors) that need to be preserved or re-established, safe wildlife crossings/structures under or over the roadway that accommodate the species residing in the area, and fencing that effectively prevents wildlife entry onto the roadway and that funnels them to safe crossing locations/structures. These actions provide for the safety of both wildlife and motorists.

Ecological connectivity is a broader concept, however, than wildlife movement in the landscape. It includes the connections and interactions between land and water, the transfer of water, wood, soil, nutrients, genes, species, and so on. For example, ecological connectivity is impaired when a stream is channelized and separated from its flood plain; when shoreline structures or bank armoring block sediment flows and shoreline enrichment processes; when dams are built or culvert installation block fish passage; when wetland fills or impervious surface prevent ground water aquifer recharge; when hillslope cuts breach seepage areas, springs, or underground aquifers; when aquatic habitat hydrological alterations and development interfere with surface water/ground water interactions and riverine hyporheic zones; and so on. Environmental impact assessments need to focus much more on identifying these connections and the consequences of severing them; project design should incorporate the means to preserve them.

Aquatic resources. Road construction may affect aquatic resources: (1) additional human use in and around streams as well as construction of and additional runoff from impermeable road surfaces will adversely impact water quality; (2) wetlands and riparian areas located adjacent to the road may be encroached upon and their hydrologic function altered; and (3) road encroachment may degrade the habitat for fish and other aquatic biota. For any impacts that cannot be avoided through siting and design, the NEPA document should describe the types, location, and estimated effectiveness of best management practices (BMPs) applied to minimize and mitigate impacts to aquatic resources.

To meet the requirements of the Clean Water Act, the NEPA document must identify all water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters. If there are Clean Water Act 303(d)-listed waterbodies, the NEPA document must additionally state whether a Total Maximum Daily Load (TMDL) has been developed for the streams and the pollutant(s) of concern. Provisions for antidegradation of water quality apply to streams where water quality standards are presently being met.

Wetlands and riparian areas. The proposed road construction may affect the functions, structure, and hydrologic flow of any impacted riparian areas and wetlands. The NEPA document should describe riparian areas, including widths, types of vegetation, and functional values and integrity. The document should provide wetland determinations, estimated acreage, types, and ecological functions of wetlands in the planning area. Also, the document should address in detail the potential loss of riparian and wetland functions and diminished water quality under each of the action alternatives.

The proposed activities may require a CWA Section 404 permit, both for in-stream and wetland alterations. For wetlands, section 404(b)(1) guidelines state that impacts to wetlands are to be (1) avoided, (2) minimized, and (3) mitigated. The NEPA document should discuss in detail how planning efforts conform with decision-making direction specified in Section 404(b)(1) guidelines. FHWA must show, under Section 404, that they have avoided impacting the wetlands to the extent possible. The NEPA document should discuss alternatives that would not impact wetlands before proceeding to minimization/mitigation measures. Wetland mitigation measures should be designed to replace wetland functions lost as a result of the project. Wetland functional assessments should be used to demonstrate the adequacy of the wetland mitigation efforts.

Endangered, threatened, candidate, sensitive species. If the proposed project activities could affect species listed under the Endangered Species Act as threatened or endangered, the NEPA document should include the Biological Assessment and the associated FWS or NMFS Biological Opinion or formal concurrence for the following reasons:

- NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made.

- The CEQ Regulations for Implementing NEPA strongly encourage the integration of NEPA requirements with other environmental review and consultation requirements (40 CFR 1502.25).

- The Endangered Species Act (ESA) consultation process can result in the identification of mandatory, reasonable, and prudent alternatives that can significantly affect project implementation.

Since both the Biological Assessment and the NEPA document must evaluate the potential impacts of the project on listed species, they can jointly assist in analyzing the effectiveness of project alternatives and mitigation measures. EPA recommends that the final NEPA decision document not be completed prior to the completion of ESA consultation. If the

consultation process is treated as a separate process, the federal agency risks FWS and/or NMFS identification of additional significant impacts, new mitigation measures, or changes to the preferred alternative. If these changes have not been evaluated in the original NEPA document, a supplement to the document would be necessary.

In addition to federally listed endangered and threatened species, there may also be state listed species, candidate state or federal species, and other sensitive or declining plant and animal species and their habitats in the project area. We recommend that the state Natural Heritage Program, the state and federal fish and wildlife agencies, and other appropriate authorities on the conservation of biological diversity be contacted to identify these species and their habitats. The EIS should disclose these sensitive species and habitats, and the alternatives presented should reflect all possible measures to avoid and minimize disturbance or harm to them.

Invasive species. Ground disturbing activities create opportunity for establishment of non-native invasive species. In compliance with NEPA and with the Executive Order 13112, analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We urge that disturbed areas be revegetated using native species, including a native grass and forb mixture to ensure adequate coverage to prevent establishment of invasive plants, and that there be ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasives in areas disturbed by project activities.

Indirect/secondary, and cumulative effects. In addition to the direct impacts to the natural and human environment, secondary and cumulative impacts should be analyzed and disclosed. Examples include increased and induced vehicle miles traveled (VMT); induced growth and development and its associated terrestrial and aquatic habitat losses, fragmentation, and alterations, water and air quality effects, fish and wildlife mortality and disturbance effects, and other impacts that are likely to result. The affected environment for each resource category should be adequately described to establish past impacts, and existing baseline conditions and stresses to those resources, so that the added effects can be discerned.

Cultural resources. The intact, high value habitats in the project area may also have significant cultural value for Native Americans, such as the Nez Perce, Colville, and Coeur d'Alene Tribes. Impacts to tribal cultural resources and historic and archeological resources need to be disclosed in the EIS.

Under NEPA, the scope of cultural resource analysis should include direct and indirect impacts to traditional resource rights, historic buildings, historic districts, archeological sites, Native American traditional places, sacred sites, environmental justice issues, and traditional ways of life. The following is a list of specifics that we believe should be addressed in the EIS for a complete analysis of cultural resources:

- sacred sites (see Executive Order 13007);
- traditional cultural properties or landscapes;
- hunting, fishing, gathering areas (including impacts to ecosystems that support animals and plants that are or once were part of the tribes' traditional resource areas);

- access to traditional and current hunting, fishing, and gathering areas and species (berries, root foods, basket weaving materials, fire wood, elk, deer, trout, and any other species of concern to the tribes);
- changes in hydrology or ecological composition of springs, seeps, wetlands, and streams, that could be considered sacred or have traditional resource use associations;
- travel routes that were historically used, and travel routes that may be currently used;
- historic properties, districts, or landscapes;
- cultural uses of the natural environment, the built environment, and human social institutions;
- unique characteristics of the geographic area such as proximity to historic or cultural resources (40 CFR 1508.27(b)(3));
- the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (40 CFR 1508.27(b)(8) in accordance with the National Historic Preservation Act (NHPA);
- Potential disproportionate or adverse environmental impacts to low income and minority populations (see E.O. 12898); such impacts may be cultural, for example, impacts on a culturally important religious, subsistence, or social practice should be addressed;
- impacts to Indian Sacred Sites. E.O. 13007 requires that federal agencies minimize damage to sacred sites on federal land, and avoid blocking access to such sites by traditional religious practitioners.

EPA recommends conducting ethnographic interviews and compiling ethnohistoric information about the area. EPA also recommends close consultation with the tribes (see E.O. 13175), and the appropriate State Office for archaeology and historic preservation.

We recommend that NHPA Section 106 review be conducted during the preparation of the DEIS and that consultation be initiated with affected and potentially affected tribes and Native American descendants. Consultation to resolve adverse effects should be coordinated with public comment on the DEIS, with the results reported in the Final EIS. Any Memorandum of Agreement (MOA) developed under Section 106, or the final comments of the Advisory Council on Historic Preservation (ACHP), should be addressed in the ROD. The Section 106 MOA should be fully executed before the ROD is issued, and the ROD should provide for implementation of the MOA's terms.

Social/cultural effects and Environmental Justice. We recommend conducting community impact assessments for communities that are most affected by the proposed project. The Federal Highway Administration (FHWA) publication, *Community Impact Assessment: A Quick Reference for Transportation* [publication No. FHWA-PD-96-036, HEP-30/8-96(10M)P], is available as guidance, and pertinent websites can also provide information. Historic resources and the full range of tribal treaty resources, as discussed above, should be addressed. Formal consultation should be conducted regarding both their natural and cultural resources affected by the proposed project. Useful references include:

- http://www.npi.org/nepa/index.html regarding NEPA and cultural resources;
- http://www.epa.gov/compliance/resources/publications/ej/ips_consultation_guide.pdf includes the document, *Guide on Consultation and Collaboration with Indian Tribal Governments and the Public Participation of Indigenous Groups and Tribal Members in*

Environmental Decision Making.

- Executive Orders:
  - E.O. 13175, Consultation and Coordination with Tribes;
  - E.O. 13007, Indian Sacred Sites;
  - E.O. 12898, Environmental Justice.

In compliance with NEPA and with E.O. 12898 on Environmental Justice, actions should be taken to conduct adequate public outreach and participation that ensures the public and Native American tribes truly understand the possible impacts to their communities and trust resources. Environmental Justice communities and tribes must be effectively informed, heard, and responded to regarding the project impacts and issues affecting their communities and natural and cultural resources. The information gathered from the public participation process and how this information is factored into decision-making should be disclosed in the EIS.

The U.S. has a unique relationship with tribal governments, which requires that federal government plans, projects, programs and activities assess impacts on tribal trust resources. Agencies shall assess all impacts to tribal trust resources and include those impacts in the agencies' environmental documents. In accord with the Executive Memo of April 29, 1994, on Government-to-Government Relations with Native American Tribal Governments, each federal agency shall consult to the greatest extent practicable and to the extent permitted by law, with tribal governments prior to taking actions that affect federally-recognized tribal governments.

Air Toxics. There is heightened concern for human health from projects that result in air toxics emissions and particulate matter from mobile sources, particularly diesel exhaust. The EIS should disclose the human health effects of air toxics and particulate matter from mobile sources, and identify any sensitive receptor locations for the project. For receptor locations, we recommend that hotspot analysis be conducted for these pollutants, and that construction mitigation measures be included. We have enclosed a list of potential mitigation measures to reduce emissions during construction.

We appreciate the opportunity to offer these comments and look forward to working collaboratively on the project with FHWA and all interested and affected parties. Please contact me at 206/553-2966 or somers.elaine@epa.gov, if you have questions or would like to discuss these comments.

Sincerely,



Elaine Somers
NEPA/309 Environmental Review
Geographic Unit

Enclosure

December 21, 2010

Mr. Dave Cadwallader
Clearwater Regional Supervisor
Idaho Department of Fish & Game
3316 16th Street
Lewiston, ID 83501

Re: Project No. DHP-NH-4110(156); Key No. 09294
Transmittal of *Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow*

Dear Mr. Cadwallader:

The Idaho Transportation Department ("ITD") appreciates the past assistance provided by the Idaho Department of Fish and Game ("IDFG") to assess potential wildlife impacts relating to the US-95 Thorncreek Road to Moscow project.

In follow-up to prior discussions with and comments received from IDFG, ITD transmits herewith the report prepared by Western Ecosystems Technology entitled *Assessment of Potential Big Game Impacts and Mitigation Associated with Highway Alternatives from Thorncreek Road to Moscow*. The enclosed report concludes that "[g]iven the marginal quality habitat and limited observations of moose and elk in the area, there is no evidence that suggests the E-2 alternative would have measurable impacts on either species. Accordingly, mitigation for direct habitat loss, indirect habitat loss, or loss of connectivity for moose or elk is not warranted." However, the Report recommends future monitoring of vehicular-wildlife collisions to determine whether future mitigation might be warranted in Sections of E-2 (in the event E-2 is selected as the preferred alignment). ITD also transmits ITD's *Safety Evaluation*, which explains implementation of the monitoring recommendation.

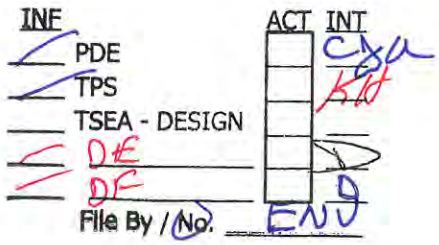
Thank you again for your assistance. Please feel free to contact me at (208) 799-5090, should you have any questions.

Sincerely,

ORIGINAL SIGNED BY:
KENNETH G. HELM, Project Manager
Thorncreek Road to Moscow

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Enclosure

bcc: DE2 PDE2 DTE2 EP



#9294

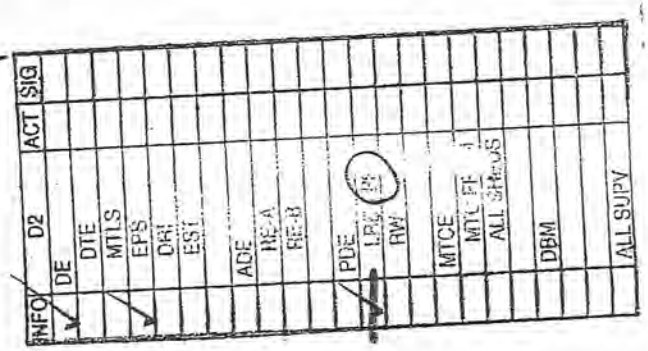
IDAHO DEPARTMENT OF FISH AND GAME
CLEARWATER REGION
3316 16th Street
Lewiston, Idaho 83501

C.L. "Butch" Otter/Governor
Cal Groen/Director

October 26, 2007

RECEIVED
NOV 06 2007
DIV. OF HIGHWAYS
LEWISTON, IDAHO

Mr. James Carpenter, District Engineer
Idaho Transportation Department
District 2
P.O. Box 837
Lewiston ID 83501



Dear Jim:

In December or 2006, at your request, IDFG submitted to you a Wildlife Assessment for the proposed US95 Thorncreek to Moscow highway improvement project. Clearwater Region IDFG staff prepared this report in the spirit of interagency cooperation and to enhance protection of fish and wildlife in our region.

Furthermore, at ITD's request, our Wildlife Assessment recommended mitigations for impacts of the proposed highway on wildlife and wildlife habitat. Our recommendations were not an exhaustive list of the potential options available for mitigation, and were not intended to be limiting. Instead, our goal was for our recommendations to stimulate considerable thought and discussion between our agencies that would ultimately lead to appropriate and effective protections and enhancements for wildlife as part of the Thorncreek to Moscow highway project.

In May, we received a request from ITD for additional information regarding the Wildlife Assessment and our recommended mitigations (ITD, Funkhouser letter, May 3, 2007). IDFG responded to your request (IDFG, Cadwallader letter, June 23, 2007) Then, Dave Cadwallader, IDFG Region 2 Supervisor, and Ray Hennekey, Region 2 Environmental Staff Biologist, met with yourself, and ITD's Zack Funkhouser and Ken Helm on August 2 to further discuss our mitigation recommendations and attempt to resolve differences in outlook and approach to mitigation.

ITD informed us at the meeting that most of the mitigations we had recommended in the Wildlife Assessment were acceptable to ITD. However, there were two glaring exceptions: First, ITD was concerned about the cost of, and not convinced of the need to construct passage structures for big game, as recommended by Melquist in an independent contract report to ITD. IDFG had offered support for Melquist's recommendations in the Wildlife Assessment.

Second, and apparently most problematic from ITD's perspective, was IDFG's recommended mitigation to replace wildlife habitat that would be lost to the highway footprint. Our recommendation in the Wildlife Assessment, which included a 300 meter disturbance zone on either side of the highway, was for

replacement of habitat at a 1:1 (acres replacement/acres lost) ratio for the central and western alignments and at a 2:1 ratio for the eastern alternative, where both direct and indirect wildlife impacts will be greatest. In our August meeting, you made it very clear that ITD does not feel that it has any responsibility to mitigate for wildlife or habitat unless ESA species are involved. Furthermore, you stated that replacement of lost habitat at the rates we recommended would stymie the project because of the added cost of purchasing land or easements for wildlife habitat. In essence, ITD rejected this mitigation recommendation out of hand.

IDFG acknowledged the potential cost of the recommended mitigation and, though we believe mitigation is necessary and appropriate, stated our shared interest in completing the US95 improvements. Therefore, in lieu of the habitat replacement ratios we initially proposed, IDFG offered to develop a baseline funding proposal for a "bank" or trust to be funded by ITD as mitigation for habitat loss. The proposed fund would be used to provide funding for purchases of easements or habitat, for habitat improvements in the Palouse region, or for other activities that would benefit wildlife. IDFG also agreed that wildlife passage structures for big game were not necessary and might not be effective. At the August meeting, ITD accepted those offers and agreed to consider a baseline funding proposal that IDFG would prepare. Therefore, we submit the following,

IDFG's alternative mitigation proposal:

> ITD will deposit $500,000 for the western alignment (W4, 185 acres at 1:1) or $325,000 for the central alignment (C3, 125 acres at 1:1) or $750,000 for the eastern alignment (E2, 185 acres at 1.5:1) into a fund that will be used to acquire, protect or enhance wildlife habitat or to fund other activities to benefit wildlife in the Palouse Ecoregion (ecoregion as defined in the Idaho CWMS). The fund will be administered by IDFG.[1] Other details (*e.g.*, where the fund will be housed, etc.) will be made pending ITD acceptance of this recommendation.

IDFG believes this to be a very reasonable alternative to our original mitigation proposal – we think the bank can be used to provide meaningful protection for wildlife and habitat at less than 1 percent of the total project cost and at a fraction of what the original IDFG mitigation proposal would have cost ITD. In addition, we made several substantive concessions to arrive at this alternative proposal. These include:

- calculating the value based only on the actual new highway footprint – we did not include the 300 meter disturbance zone we included in our previous recommendations;
- calculating alternative E2 acres replacement at 1.5:1 acre lost, instead of 2:1 as originally proposed; and
- IDFG withdrew support for construction of the 2-3 big game passage structures recommended by Melquist.

[1] The values were calculated based on an approximate average current selling price of $2600 per acre for prime agricultural land in Latah County in the vicinity of the project. Based on our research of current real estate values, recent sales, and other agencies' calculations for purchase for easement, the selling price for prime farmland is approximately $2600/acre. Non-prime agricultural land in the project, which sells for slightly less, makes up a very small percentage of the total area effected and was calculated at the same rate. Also, differences expected from including lesser value non-prime land at the same rate is more than compensated by using a median value that did not include the current development value of farmland, which was determined to be approximately $4500/acre. Also, more costly residential land values were not included. All development value and residential property was included in the total at the $2600/acre rate. An additional compensation was to round up to a nice even number to arrive at the amounts identified.

In closing, we feel it is important to repeat one additional mitigation recommendation we have made in the Wildlife Assessment and at every other opportunity: We recommend avoidance of the eastern alignment. It has been IDFG's position from the start – a position supported by recommendations from the other resource agencies – that the eastern alternative will have the greatest direct and indirect impacts to wildlife and other resources. Avoidance of impact is the primary mitigation tool available. We recommend avoidance of alternative alignment E2.

Please consider these recommendations in the spirit of cooperation in which we offer them. We make this proposal as a good faith effort to engage ITD in continuing negotiations to develop meaningful and effective mitigations for impacts of the US95 Thorncreek project to wildlife. We hope you give this proposal serious consideration.

Please contact me or Ray Hennekey at the Clearwater Regional Office if you have any questions regarding this proposal.

Sincerely,

Dave Cadwallader
Clearwater Regional Supervisor

DC/rh/cs

C: Bart Butterfield, NRPB

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JUN 28 2007

DIV. OF HIGHWAYS
LEWISTON, IDAHO

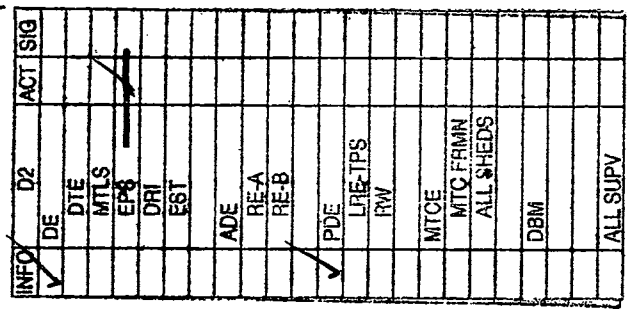
ACTION # 07-0351

IDAHO DEPARTMENT OF FISH AND GAME
CLEARWATER REGION
3316 16th Street
Lewiston, Idaho 83501

June 23, 2007

C.L. "Butch" Otter / Governor
Cal Groen / Director

Mr. James Carpenter, District Engineer
Idaho Transportation Department
District 2
P.O. Box 837
Lewiston ID 83501



Dear Mr. Carpenter:

This is in response to your May 3, 2007 letter requesting additional information related to the General Wildlife Assessment for the proposed US95 Thorncreek to Moscow highway improvement project prepared by IDFG Region 2 for ITD.

At ITD's request, Fish and Game's Wildlife Assessment recommended mitigations for impacts from the proposed highway on wildlife and wildlife habitat. Your May 3 letter asks IDFG to provide examples of other projects for which the Department has determined mitigations were necessary to offset impacts to wildlife.

The most recent example of mitigation for highway impacts to wildlife is from ITD's US95 Copeland to Canada highway project. Mitigation for that project included three wildlife underpasses and more than $100,000 for pre- and post construction monitoring of wildlife. In addition, habitat lost to new highway footprint was mitigated by a cash payment which will be used to benefit wildlife; for instance, to purchase an easement.

Mitigation for lost wildlife habitat is also received for projects other than highway development. For example, recently negotiated mitigations for the Hells Canyon Complex include a minimum of 24,000 acres for terrestrial mitigation, representing a habitat replacement ratio of 2 acres replaced for each acre lost.. The Department also routinely recommends mitigation for housing developments. One recently completed negotiation in Ada County resulted in replacement of habitat lost to a housing development at an approximately 2:1 ratio, including permanent habitat protection easements within the project boundary and a conservation easement nearby and in similar habitat.

As you can see, mitigation for impacts to wildlife habitat is not at all uncommon; expressing mitigation as a ratio of habitat lost vs. habitat replaced is typical; and the mitigation ratios we have recommended for the US95 Thorncreek to Moscow Project are consistent with mitigation received for other projects.

Your second request was for Fish and Game to provide deer, elk and moose data to support or suggest that crossing structures adjacent to Paradise Ridge would (a) be required by the effects of the project, or (b) be used by wildlife in the corridor. You also asked for data IDFG might have to support Wayne Melquist's recommendations for wildlife crossing structures.

Fish and Game has big game survey data for the project area; however, we have not collected data to determine whether crossing structures are required by the effects of the Thorncreek project or whether crossing structures recommended by Melquist would be used by wildlife. If you wish, IDFG would be pleased to discuss an arrangement with ITD that would allow us to collect new data geared specifically to answer those questions.

IDFG's mitigation recommendations in the US95 Thorncreek to Moscow Project Wildlife Assessment were not an exhaustive list of the potential options for mitigation. There are many mitigations that could be used to ameliorate the effects of the project on wildlife. It was Fish and Game's intention from the outset to provide recommendations that would stimulate considerable thought and discussion between our agencies that would lead to effective protections and enhancements for wildlife as part of the Thorncreek to Moscow highway project.

We invite you to meet with us at the Clearwater Regional Office on July 26, from 8-4 to begin to identify a suite of wildlife mitigations for the US95 Thorncreek to Moscow Project that will satisfy both our agencies' needs. Please contact me to confirm your availability for that date or to set another date if you have a conflict. I suggest that it would be best if you can provide us with alternative mitigation proposals at least a week in advance of that meeting so that our conference can be as productive as possible.

Sincerely,

Dave Cadwallader
Clearwater Regional Supervisor

DC/rh/

c: Tracey Trent
Dennis Clark, ITD Boise

May 3, 2007

Mr. Dave Cadwallader, Regional Supervisor
Idaho Department of Fish and Game
3316 16th Street
Lewiston, ID 83501

Re: Project No. DHP-NH-4110(156); Key No. 9294
Thorncreek Road to Moscow
General Wildlife Assessment

Dear Mr. Cadwallader:

The Idaho Transportation Department has received the General Wildlife Assessment prepared by Ray Hennekey dated December 14, 2006. The assessment recommends several mitigations identified by the IDFG report and the Large Ungulate Report prepared by Wayne Melquist. Both have been reviewed by ITD District Two, Headquarters and our Legal Section, as well as the Federal Highway Administration. ITD feels this process may set precedent for future ITD/IDFG interaction and for this reason, we would like to involve our ITD and your IDFG headquarters offices. Please have your headquarters office review your report and discuss it with Dennis Clark, Environmental Section Supervisor for ITD. Dennis can be reached at (208) 334-8203.

To consider our response to the recommendations made by the IDFG assessment and to document our decision making process, ITD would like to request additional information:

- Please provide information regarding the development of conservation easement mitigation ratios applied to the Thorncreek Road to Moscow project. We are specifically seeking other IDFG projects or reports where this method has been applied or other development or infrastructure projects in which a similar method was used for mitigation development and implementation. Also, any data or information regarding completed projects including mitigation results.

- Please provide any deer, elk or moose population data that supports or suggests that crossing structures adjacent to Paradise Ridge would be required by the effects of the project or utilized by species that exist within the corridor. The Melquist ungulate report identifies crossings as recommended, but not required by population effects of the U.S. 95 project. Please provide any data IDFG has which supports the recommendation for wildlife crossing structures.

Continued...

Thank you for your attention to this letter, we look forward to working with IDFG in addressing these issues.

Sincerely,

ORIGINAL SIGNED BY:

ZACHARY A. FUNKHOUSER
Environmental Planner Senior

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ENV (Clark)
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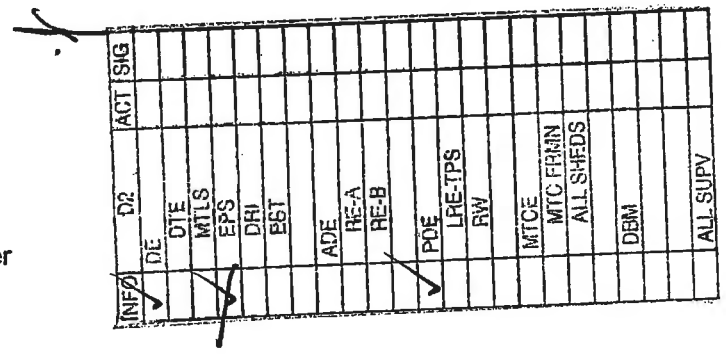
IDAHO FISH & GAME
CLEARWATER REGION
1540 Warner Avenue
Lewiston, Idaho 83501-5699

Dirk Kempthorne / Governor
Steven M. Huffaker / Director

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JUN 22 2005

DIV. OF HIGHWAYS
LEWISTON, IDAHO



June 20, 2005

Mr. Zachary Funkhouser, Environmental Planner
Idaho Department of Transportation
PO Box 837
Lewiston, Idaho 83501

Dear Zach:

Re: BIOLOGICAL EVALUATION OF POTENTIAL IMPACTS OF CORRIDOR ALTERNATIVES FROM THORNCREEK ROAD TO MOSCOW ON LARGE UNGULATES.

Thank you for the opportunity to review the Biological Evaluation of the Potential Impacts of Corridor Alternatives from Thorncreek Road to Moscow on Large Ungulates (BE). The BE evaluates and compares potential impacts of various construction alternatives for US Route 95 to deer, elk and moose.

The report (BE) has limited value as a tool for selecting construction alternatives based on impacts to large ungulates. The BE is based on a cursory assessment of available habitat and a largely windshield survey of the possible presence and use of potentially effected habitat by deer, elk and moose in the vicinity of three selected alternative alignments. The BE is also based on a review of the literature regarding deer, elk and moose biology and potential impacts of highways on those species.

Based on our own knowledge and experience, the general observations in the BE about big game presence in the study area are probably accurate, and we generally support the recommendations for mitigation. We tend to agree that impacts would range, in declining order of impact to large ungulates, from the eastern-most alternative to the western-most alternative. On the same basis, we can generally accept the recommendations for mitigation in the BE, although we'll look forward to working with ITD to develop specific mitigations, locations for wildlife passage structures, etc. when alternatives are narrowed down and more detailed plans can be developed.

We have some concerns about the BE and some of the conclusions reached regarding impact to deer, elk and moose.

First, the BE would be markedly improved by providing a more rigorous and scientifically sound evaluation of current deer, elk and moose in the project area to support conclusions and recommendations. The evaluation would be greatly enhanced with actual site-specific data to support conclusions. (Please note that the BE states that population data is not available for deer, moose and elk. IDFG has conducted elk surveys in the vicinity of the project and can provide

data on elk in subunits where populations may be affected by the project. Moose are not a focus during aerial surveys, but incidental observations of moose are recorded as well.)

The BE concludes that the project will not have population level impacts on deer, elk or moose. This tends to minimize potential impacts to large ungulates as a result of the highway and to infer that mitigation would have limited value. We are inclined to agree that population level impacts are unlikely, at least for large ungulates. However, less than population level impacts are important and should be assessed in a BE. Further, we wish to emphasize that population level impacts are not a prerequisite for mitigation. Any impacts that affect moose, deer or elk or otherwise diminish the resource deserve mitigation.

The BE states that a cumulative impacts analysis was done, then draws conclusions about project impacts and potential mitigation based on that analysis. However, the BE provides no evidence that the kinds of data on which such an analysis would depend was reviewed and evaluated (*e.g.,* current/projected land ownership, current projections for and potential changes in residential growth and development as a result of new highway construction, cumulative impacts of retaining existing portions of the highway in addition to new construction, etc.). Therefore, it appears that a cumulative effects analysis was not done. Conclusions in the BE that the project will not have long-term population-level impacts are highly suspect as a result.

We were disturbed by the inference in the BE that the impacts from the highway project are acceptable because future residential development would eventually destroy habitat and displace big game even if the road is not constructed. Anticipated future impacts to wildlife from residential development in no way minimize impacts from the highway project or make impacts from the highway merely acceptable. Similarly, it is inappropriate to imply that mitigation for the highway might be unnecessary or ineffective because of potential impacts from future development. Anticipated residential growth in the region in no way reduces ITD's obligation to mitigate for both immediate and long-term impacts from the highway, including mitigation for projected changes or increases in residential development to which the highway improvements will contribute.

Because future residential growth is likely to be unavoidable, we repeat our original recommendation to purchase of easements or fee-title of key existing habitats for wildlife as partial mitigation for the project, regardless of alternative selected.

Thanks again for the opportunity to review and comment on this BE and to be involved so early in the process. We look forward to continuing to work with you to develop similar evaluations of US 95 Thorncreek Road to Moscow project impacts to fish, wildlife and habitat.

Sincerely,

Cal Groen
Clearwater Regional Supervisor

CG/rh/ss

IDAHO FISH & GAME/ITD MEETING FOR KEY NO. 9294 - THORNCREEK ROAD TO MOSCOW
MAY 29, 2014, 10:00 - 12:30 PST @ ITD District 2 Map Room Conference Room

Attendees:
David B. Kuisti, PE, D2 District Engineer
Ray Hennekey, IDFG Acting Regional Supervisor
Ken Helm, D2 Senior Transportation Planner
Shawn Smith, D2 Senior Environmental Planner
Michelle Anderson, Anderson Environmental Consulting
Curtis Arnzen, PE, D2 Project Development Engineer

Meeting Minutes:

1. Introductions

2. Purpose of Meeting:
    a. To discuss ITD responses to IDFG DEIS comment letter dated March 25, 2013.
    b. To respond to meeting request in IDFG letter dated June 27, 2013
    c. To discuss potential mitigation measures to be considered in the Final EIS.

3. Discussion on IDFG DEIS Comments:
    a. Response Letter to IDFG DEIS Comments.
    See attached preliminary letter from ITD showing ITD Responses to IDFG Comments on the DEIS for US-95 Thorncreek to Moscow project.

    Michelle Anderson and ITD referred to the sections of the IDFG DEIS comment letter and discussed the preliminary responses presented in ITD's response letter. Feedback regarding various sections in the letter was solicited.

    Michelle Anderson explained that ITD and FHWA met with USFWS, Latah County Conservation District, and NRCS regarding the restoration projects planned for the area. As acknowledged by IDFG, all alternatives avoid directly impacting the Palouse Prairie remnants but would have indirect effects to the remnants. Michelle explained that ITD and the noted agencies are trying to coordinate restoration efforts to be as far from the alignments as possible and would be concentrated up on the ridge. Weed control mitigation measures were described.

    Regarding the Mitigation MOU, IDFG and ITD agreed that a MOU is not necessary. Mitigation items will be clearly described in the FEIS. ITD will not make any commitment to monitor wildlife crashes beyond what is currently done. ITD also indicated that wildlife crash collisions would be monitored after the project is complete using the same method that wildlife crashes are monitored today.

Several topics in the comment letter and responses which referred to semantics, corrections to references to the General Wildlife Assessment and citations (use of indicator species versus representative species, habitat generalists and other topics noted in the letter), were touched upon lightly, but not discussed in great depth. These clarifications are made in the FEIS and will be reviewed in greater detail by IDFG.

The group discussed the rationale for emphasis on the Sawyer Report, and that additional explanation is presented in the FEIS. Michelle noted that additional detail regarding indirect effects to wildlife, including fragmentation, noise, and cumulative effects are included in Chapter 6 of the FEIS.

In response to the comments regarding wildlife collisions, Michelle and Curtis explained that the existing US-95 would have lower crash rates because traffic volumes would be reduced to a tenth of the existing volumes resulting in fewer wildlife collisions. Severity of wildlife crashes versus intersection related crashes was also briefly discussed by ITD. Curtis explained that the Safety Analysis was revised to include the analysis of the existing US-95. The cumulative crash predictions on both the proposed alternative and the portion of existing US-95 that will remain after the construction of a proposed alternative will be presented in the revised safety analysis and the FEIS.

Ray suggested IDFG review the relevant sections of the FEIS to determine if the modifications sufficiently addressed their concerns and to ensure mitigations were adequately developed and described. That would also give ITD and IDFG a chance to resolve questions or concerns about mitigation prior to submittal of the FEIS. Ray suggested that IDFG be afforded an opportunity to preview applicable sections of the FEIS prior to its official submittal and ITD agreed to his request.

b. Mitigation Items:
The potential mitigation measures shown in the IDFG's DEIS comment letter and the ITD response to comments were discussed.

Regarding culverts and passage structures: The group discussed that passage structures for big game were suggested early in the project development but were determined not to be warranted for this project. At the time, it was a newly emerging concept. Since then, studies on statewide priorities and the effectiveness of these structures have been released.

Michelle explained that there are mitigation measures from Rudiger's study on oversizing culverts that have been added. Ken explained that all the culverts will

be much larger than existing culverts. The group discussed sizing and general locations.

It was agreed that ITD will add a commitment to the FEIS to consult with the IDFG before final design about specific design details as they pertain to wildlife, including size and location of the culvert or passage structure. Other wildlife mitigation measures described below will also be included in this consultation. Specific decisions on design detail cannot be made until final design information is known about the selected alternative.

Regarding Short-Eared Owls: The ITD will commit to consulting with the IDFG about possible installation of special reflective posts or delineators near the highway.

Regarding Bats: IDFG clarified that the intent of their bat mitigation comment was to discourage bats from roosting under bridges and other highway structures not to encourage them to roost in these locations. ITD had misunderstood the comment so the clarification will be made in the response letter. Roosting facilities will be installed as far away from the highway as possible to help prevent bat and car collisions.

Michelle also briefly reviewed the last miscellaneous comments regarding surveys and quality of tributaries. Shawn discussed the Cow Creek Mitigation site, which will replace the functions and values of the wetlands impacted by the project and will include several different habitat features. Ray stated that there are general wildlife habitat impacts due to the footprint of the new alignment and the indirect effects to wildlife. The group discussed that the E-2 alternative would affect better habitat (such as the pine stand) than the other alternatives, and the mitigation measures should reflect that. Michelle explained that the table in Chapter 9 lists specific measures only applicable to the E-2 Alternative and there are many specific to E-2. More mitigation items have also been added to the table (culvert sizing, owl reflective posts, etc). IDFG was not able to discuss any of the added mitigations because they have not had an opportunity to review them.

4. Discussion on the June 27, 2013 IDFG letter:

   Ray Hennekey stated IDFG is no longer seeking establishment of a Palouse ecoregion trust fund to mitigate for wildlife impacts as a result of the Thorncreek to Moscow Project.

   Ray also emphasized that IDFG still prefers Alternative C3 because that alternative would have the least impact to resources.

ITD indicated that the ITD Study with Utah State University regarding wildlife-vehicle collisions would be forwarded to IDFG once it is complete.

5. What is next:

   ITD will revise the FEIS to eliminate mention of the MOU and will list and describe the mitigation measures. A mitigation measure will be added that ITD will coordinate with IDFG during the design process, when an action alternative has been selected. ITD will work with IDFG regarding the selection, design and location of wildlife mitigation measures (such as passage structures, culverts, owl reflectors and bat roosts etc).

   ITD will compile notes from this meeting and forward a signed copy to Ray Hennekey for his review. ITD will ask Ray to sign the meeting notes to indicate that he reviewed the minutes once he agrees with the minutes.

   ITD will provide Ray Hennekey with a draft copy of the relevant sections of the FEIS for his review.

   ITD will continue completing the final requirements of the FEIS and submit it for FHWA review when ready. This is anticipated in the near future.

6. Closing/Wrap-up

Reviewed By: _____ 6/11/14
Ray Hennekey, Acting Regional Supervisor, IDFG Clearwater Region — Date

Reviewed By: _____ 6-19-14
David B. Kuisti, PE, D2 District Engineer — Date

Shawn Smith <Shawn.Smith@itd.idaho.gov> May 15, 2014 12:45 PM

To: Dave Ellis <Dave.Ellis@itd.idaho.gov>, Ken Helm <Ken.Helm@itd.idaho.gov>
Cc: Michelle Anderson <anderenv@q.com>
FW: US 95, Cow Creek Mit Site - TLH2M EIS and subsequent construction projects (UNCLASSIFIED)



FYI.

-----Original Message-----
From: Braspennickx, Nicholle M NWW [mailto:Nicholle.M.Braspenn@usace.army.mil]
Sent: Thursday, May 15, 2014 12:40 PM
To: Shawn Smith; Victoria Jewell Guerra
Subject: US 95, Cow Creek Mit Site - TLH2M EIS and subsequent construction projects (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Hello !

Many months ago - perhaps even a year ago? ITD D2 asked the Corps to confirm whether the Cow Creek Mitigation site (deemed successful as meeting its success criteria by the Corps Regulatory Division (RD) on August 19, 2010)... would suffice to also provide compensatory mitigation for the remaining ThCr2M Project(s).

The Corps RD scoured all our files... NWW No. 2004-0600013, KN 7769, and NWW No. 2004-0600046, KN 09294. We also scoured the pre-application information (original mitigation plans), the monitoring plans, and other information.

As far as the Corps RD can determine, the Cow Creek Mitigation Site is to serve as compensatory mitigation for all projects involved w/ US 95, Top of Lewiston Hill to Moscow, including the remaining US 95, Thorn Creek to Moscow, EIS portion of the project.

In conversations w/ Mr. Shawn Smith - we both agree that should the Corps determine a shortfall in compensatory mitigation at the time of permitting for the remaining project(s).... perhaps ITD could then avail itself of a local mitigation bank for the difference.

Yours Truly,

Nicholle Braspennickx
Regulatory Project Manager
208-345-2287

Classification: UNCLASSIFIED
Caveats: NONE

APPENDIX 2. LIST OF PREPARERS AND REVIEWERS

Name	Responsibility/Role	Education	Experience
US DEPARTMENT OF TRANSPORTATION - Federal Highway Administration (FHWA), Idaho Division			
Ross Blanchard	Project Review	B.S. Civil Engineering	20 years
Kyle Holman	Project Review	B.S. Civil Engineering	8.5 years
John Perry	Project Review	B.S. Civil Engineering	23 years
Paul Ziman	Project Review	B.S. Civil Engineering	26 years
Brent Inghram	Project Review	B.S. Environmental Planning/ Management M.S. Geological Engineering	32 years
IDAHO TRANSPORTATION DEPARTMENT (ITD)			
Ken Helm	Project Management	A.S. Drafting Technology	37 years
Zach Funkhauser	Project Management / NEPA Review	B.S. Biology	14 years
Shawn Smith	Project Management / NEPA Review	B.S. Biology	12 years
Curtis Arnzen	Project Development Engineer / Safety	B.S. Civil Engineering	16 years
Dave Couch	Traffic Control / Safety	B.S. Civil Engineering	26 years
Ron Perkins	Professional Land Surveyor/GIS	2.5 years Civil Engineering Education	18 years
Mark Munch	Cultural Resource Review	M.A. Anthropology	18 years
Paul Frei	Traffic Control / Safety	A.S. Drafting Technology	25 years
Manny Todhunter	Floodplain Assessment	B.S. Civil Engineering	42 years
Dave Ellis	Highway Design	A.S. Drafting Technology	38 years
Dan Everhart	Architectural History Review	B.A. Museum Studies and History	11 years
Vicky Jewell Guerra	NEPA Policy, Process and Review	B.S. Environmental M.B.A Environmental Emphasis	25 years
US ARMY CORPS OF ENGINEERS (USACE)			
Nicholle Braspennickx	NEPA Review/Wetland and Water of US	B.S. Biology	24 years
ANDERSON ENVIRONMENTAL CONSULTING (AEC) LLC			
Michelle Anderson	NEPA Review/EIS Primary Technical Writer	B.A. Biology	20 years
Suzanne Pattinson	EIS Technical Writer/GIS Analyst	B.S. Natural Resources	9 years
TECHNICAL REPORT AUTHORS			
Russell Qualls ID State Climatologist	Weather Report	Ph.D. Civil and Environmental Engineering	26 years
Ed Haagen	Farmland Report	B.S. Agricultural Soils	37 years

Name	Responsibility/Role	Education	Experience
Private Consultant			
Shelly Gilmore Resource Planning Unlimited	Wetlands Technical Reports	B.S. Natural Resource Administration	22 years
Miguel Gaddi HDR	Community Impact Assessment Technical Reports	M.S. Urban and Regional Planning	17 years
Kris Horton Bionomics	Traffic Noise Report	B.S. Animal Science	12 years
David Aizpitarte Bionomics	Traffic Noise Report	B.S. Bacteriology, MBA	27 years
Juanita Lichthardt	Rare Plant Inventory Report/ Biological Assessment	B.A. Biology, M.A. Biology	28 years
Wayne Melquist	Wildlife Inventory Report / Biological Assessment	B.S. Biology, M.S. Zoology Ph.D. Wildlife Resources	44 years
William Ruediger	Wildlife Report	B.S. Wildlife Management M.S. Forest Management	42 years
Hall Sawyer	Wildlife Report	B.S. Wildlife Biology M.S. Zoology Ph.D. Zoology and Physiology	19 years
Stan Gough	Archaeological / Architectural Report	B.A. Anthropology M.S. Geology	37 years
Ann Sharley	Archaeological / Architectural Report	B.A. Anthropology M.A. Historic Preservation	22 years
Dale Ralston	Hydrogeologic Report	B.S. Civil Engineering M.S. Hydrology Ph.D. Civil Engineering -Water Resources	51 years
Rosemary Curtain RBCI Incorporated	Public Involvement	B.S. Economics and Political Science M.A. Public Policy	16 years

APPENDIX 3. LIST OF AGENCIES, ORGANIZATIONS AND PERSONS RECEIVING THE DEIS AND FEIS

The FEIS has been transmitted to persons, organizations, and agencies that made substantive comments on the DEIS or requested a copy. A notice of availability was published in the Federal Register and local newspapers. The FEIS is available for public review at the following locations.

Public Viewing Locations

The following are locations where hard copies of the DEIS may be viewed:

Federal Highway Administration
Idaho Division
3050 Lakeharbor Lane, Suite 126
Boise, ID 83703

Genesee Public Library
140 East Walnut Street
Genesee, ID 83832

Idaho State Library Main Office
325 W State St.
Boise, ID 83702

Idaho State Library
Northern Field Office
1420 S. Blaine Ste. B
Moscow, ID 83843

Idaho Transportation Department
District 2
2600 Frontage Rd.
Lewiston, ID 83501-0837

Idaho Transportation Department
Headquarters
3311 W. State St.
Boise, ID 83703

Latah County Library
110 South Jefferson St.
Moscow, ID 83843

Lewiston Library
428 Thain Rd.
Lewiston, ID 83501

Moscow Chamber of Commerce
411 S. Main Street
Moscow, ID 83843

Moscow City Hall
206 East Third Street
Moscow, ID 83843

Moscow Public Library
110 South Jefferson St.
Moscow, ID 83843

The document and technical reports may also be downloaded or viewed electronically through project website at: www.itd.idaho.gov/Projects/D2/ and select "US-95 Thorncreek to Moscow Phase I."

In addition, the following agencies have also received a copy:

Department of Interior
Office of Environmental Policy &
Compliance
Main Interior Building, MS 2342
1849 C Street NW;
Washington, DC 20240

Carla Fromm
Environmental Protection Agency
Region 10- Idaho Office
950 W. Bannock St., Suite 900
Boise, ID 83702

Elaine Somers
US Environmental Protection Agency
1200 Sixth Street
Seattle WA 98101

US Environmental Protection Agency
Office of Federal Activities, EIS Filing
Ariel Building; South Oval Lobby
Mail Code 2252-A
1200 Pennsylvania Avenue, NW
Washington DC 20460

Nez Perce Tribal Executive Committee
Nez Perce Tribe
P.O. Box 365
Lapwai, ID 83540

Clay Fletcher
U.S. Fish & Wildlife Service
1387 S. Vinnel Way, Suite 368
Boise, ID 83709

Idaho Department of Fish & Game
3316 16th Street
Lewiston ID 83501

Idaho State Historic Preservation Officer
210 West Main Street
Boise, ID 83702-7264

Advisory Council on Historic Preservation
1100 Pennsylvania Ave NW, Suite 809
Washington, DC 20004

Cindy Barrett
Idaho Department of Environmental Quality
1118 "F" Street
Lewiston ID 83501

City of Lewiston
P.O. Box 617
Lewiston ID 83501

City of Moscow
P.O. Box 9203
Moscow, ID 83843

City of Genesee
P.O. Box 38
Genesee, ID 83832

Ronald Wittman
Nez Perce County Commissioner
P.O. Box 896
Lewiston, ID 83501

Tom Strochein
Latah County Commissioner
P.O. Box 8068
Moscow, ID 83843

APPENDIX 4. SPECIES OF GREATEST CONSERVATION NEED; CONSERVATION RANKING DESCRIPTIONS

Global Rank (GRANK) and State Rank (SRANK) - Idaho Natural Heritage Program
The network of Natural Heritage Programs and Conservation Data Centers--which currently consists of installations in all 50 states, several Canadian provinces, and several Latin American and Caribbean countries--ranks the rangewide (GRANK or global rank) and state (SRANK or state rank) status of plants, animals, and plant communities on a scale of 1 to 5. The rank is primarily based on the number of known occurrences, but other factors such as habitat quality, estimated number of individuals, narrowness of range of habitat, trends in populations and habitat, threats to the element, and other factors are also considered. The ranking system is meant to exist alongside national and state rare species lists because these lists often include additional criteria (e.g., recovery potential, depth of knowledge) that go beyond assessing threats to extinction.

Components of Ranks:
G = Global rank indicator; denotes rank based on rangewide status.
T = Trinomial rank indicator; denotes global status of infraspecific taxa.
S = State rank indicator; denotes rank based on status within Idaho.
1 = Critically imperiled because of extreme rarity or because some factor of its biology makes it especially vulnerable to extinction (typically 5 or fewer occurrences).
2 = Imperiled because of rarity or because other factors demonstrably make it very vulnerable to extinction (typically 6 to 20 occurrences).
3 = Rare or uncommon but not imperiled (typically 21 to 100 occurrences).
4 = Not rare and apparently secure, but with cause for long-term concern (usually more than 100 occurrences).
5 = Demonstrably widespread, abundant, and secure.
U = Unrankable.
H = Historical occurrence (i.e., formerly part of the native biota; implied expectation that it might be rediscovered or possibly extinct).
X = Presumed extinct or extirpated.
Q = Indicates uncertainty about taxonomic status.
? = Uncertainty exists about the stated rank.
NR = Not ranked.
NA = Conservation status rank is not applicable.

Examples of Use:
G4T2 = Species is apparently secure rangewide, but this particular subspecies or variety is imperiled.

S2S3= Uncertainty exists whether the species or subspecies should be ranked S2 or S3.

State Ranks Specific to Long Distance Migrants (Bats and Birds):

A = Accidental (occurring only once or a few times) or casual (occurring more regularly although not every year) in Idaho; a few of these species might have bred on one or more of the occasions when they were recorded.

B = Breeding population.

M = Only applies when migrant occurs in an irregular, transitory, and dispersed manner. Occurrences cannot be defined from year-to-year.

N = Nonbreeding population.

Examples of Use:

S4N = Fairly common winter resident.

S1B,S5N = Rare breeder but a common winter resident.

S2B,SMN = Rare breeder and uncommon spring and fall transient with lesser numbers remaining as local and irregular (in location) winter residents.

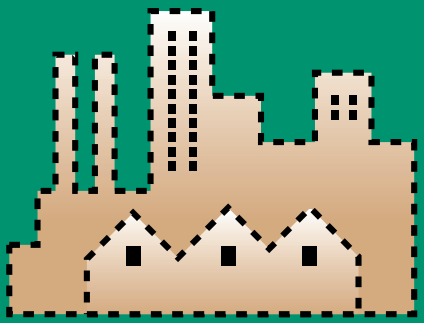
Sources: Accessed April 24, 2012.

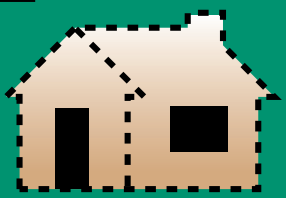
APPENDIX 5. UNIFORM RELOCATION ACT SUMMARY

IDAHO TRANSPORTATION DEPARTMENT

RIGHT OF WAY

RELOCATION SERVICES



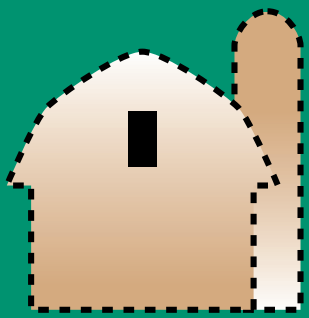


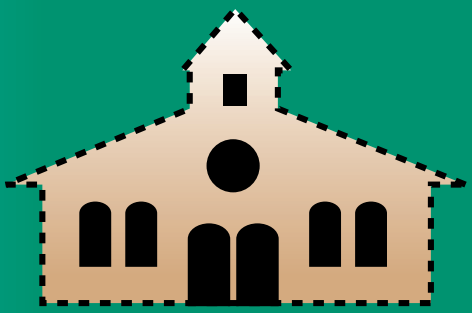
Business

Residential

Farm

Non-Profit





The Idaho Transportation Department (ITD) is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. ITD assures that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any ITD service, program, or activity. The department also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the department will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

Costs associated with this publication are available from the transportation department in accordance with Idaho Code Section 60-202. 2500/05/2006

Dear Fellow Idahoans:

The following tells you about the relocation program benefits available if you have to move from the path of a federally funded project. To ease the problems of finding a new place to live, to do business or to farm, the Idaho Transportation Department provides two programs:

THE RELOCATION ASSISTANCE PROGRAM
THE RELOCATION PAYMENTS PROGRAM

This booklet is a general description of these programs. It explains who is eligible for the benefits available and how they may be obtained. Please become familiar with the parts that apply to you; it may save time and possible misunderstandings later.

If you are to be displaced, you will be personally contacted by a Relocation Agent. The programs will be fully explained and you will be advised how to utilize them to your best advantage. You will be supplied with the forms needed to claim your payments and offered assistance in filling them out. It is the responsibility of the Relocation Agent to assist you and give you complete, factual relocation information.

IDAHO TRANSPORTATION DEPARTMENT

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DECLARATION OF POLICY

Department of Transportation Policy: The United States Secretary of Transportation stated in the Department's "Replacement Housing Policy" in DOT Order 5620.1 dated 6/24/70, the following guidelines:

It is the policy of the Department of Transportation that no person shall be displaced by the Department's federal and federally-assisted construction projects unless and until adequate replacement housing has already been provided for or is built. To accomplish this policy, the following three principal points must be carried out:

a. Specific written assurance that adequate replacement housing will be available or provided for (built if necessary) will be required before the initial approval of endorsement of any project.

b. Construction will be authorized only upon verification that replacement housing is in place and has been made available to all affected persons.

c. All replacement housing must be fair housing—open to all persons regardless of race, color, religion, sex, or national origin. This is in addition to the requirement that replacement housing must be offered to all affected persons regardless of their race, color, religion, sex, or national origin.

If you feel that the housing is not fair housing, then you should register a complaint with the Human Rights Commission, Statehouse, Boise ID 83720, Phone Number 208-334-2873.

SOME IMPORTANT DEFINITIONS

Displaced Person: A "displaced person" is any person (individual, family, corporation, partnership, or association) who moves and /or moves personal property as the result of the acquisition of the real property, or as the result of a written notice from the Idaho Transportation Department to vacate the real property that is needed for a project. In the case of a partial acquisition, the Idaho Transportation Department shall determine if a person is displaced as a direct result of the acquisition. Relocation benefits will vary upon the type and length of occupancy.

Relocation Claim: A formal application for relocation assistance payment is required, using forms provided by the Relocation Agent. The claim form must be received by the Idaho Transportation Department no more than 18 months after the displacement date or when payment is received from the State whichever is later.



Business: Any lawful activity, with the exception of a farm operation, conducted primarily for the purchase, sale, lease and/or rental of personal and/or real property, and/or for the manufacture, processing, and/or marketing of products, commodities, and/or any other person property; or for the sale of services to the public; or solely for the purpose of this Act, an outdoor advertising display or displays, when the display(s) must be moved as a result of the project; or a legal entity purposefully engaged in a legal, not-for-profit activity ("nonprofit organization").

Farm: Any lawful activity conducted solely or primarily for the production of one or more agricultural products or commodities including timber for sale or home use and customarily producing such products or commodities in sufficient quantity to be capable of contributing materially to the operator's support.

Nonprofit Organization: A "business" that is licensed and/or registered, when required by local or federal authority, for operation on a not-for-profit basis and exempt from federal income taxes.

Comparable Replacement Dwelling: A comparable replacement dwelling must be "decent, safe, and sanitary," and should be functionally equivalent to your present dwelling.

Functionally Equivalent: The term functionally equivalent means that the comparable replacement dwelling performs the same function, provides the same utility. While a comparable replacement dwelling need not possess every feature of the displacement dwelling , the principal features must be present.

THE RELOCATION ASSISTANCE & PAYMENT PROGRAM

What it does: The Idaho Transportation Department will give you assistance in finding a new place to live or in which to do business. A Relocation Agent is assigned to each highway project for this purpose. The Relocation Agent will have lists of properties being offered for sale or rent that are in suitable condition, price, or rental range for you and your family. Information concerning available properties, typical real estate purchase and leasing costs, available public housing and the services offered by other agencies in the area will also be available.

How Soon Will I Have to Move? You will receive at least ninety (90) days notice in writing of the date you have to move. This notice usually will not be given until the State has acquired the property.

What is the Relocation Payments Program? The Relocation Payments Program is designed to help pay the expenses encountered in moving when homes, businesses, farms, and nonprofit organizations must be relocated to make room for a highway project. Two different kinds of payments are involved:

1. Moving Expenses

Most owners and tenants of homes, mobile homes, businesses, farms, and nonprofit organizations displaced by a project will be eligible to receive payment for their actual and reasonable expenses in moving themselves, their family, business, farm operation, or other personal property, and in searching for a replacement business or farm location. Also, payment will be made for actual direct losses of tangible personal property as a result of moving or discontinuing a business, farm operation, or nonprofit organization.

2. Replacement Housing Payments (R.H.P.)

a. **Replacement Housing Supplements**
Long term owner-occupants of homes, unable to purchase comparable replacement housing at price levels equal to what they received from the State for their homes, may be eligible to receive a *Supplemental Payment*.

b. **Rent Supplements**
Tenants and short-term owner-occupants of residential units, unable to rent comparable residential units at price levels equal to the rent they are paying at the time they move, may be eligible to receive a *Supplemental Payment*.

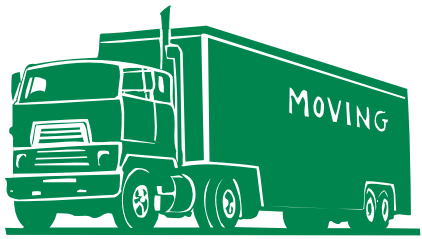
Payments received under the Relocation Assistance Program will not be considered as income for the purpose of any income tax; nor as income or resources for the purpose of determining eligibility for assistance from the State Department of Health and Welfare. Nor are such payments considered as income for the purpose of determining the eligibility of any person for assistance under the Social Security Act or any other Federal law.

The following pages explain these payments in greater detail. If you have any questions not covered here, please feel free to ask. Copies of the rules and regulations governing the administration of the Relocation Assistance Program may be obtained from the Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, Idaho, 83707-1129.

MOVING EXPENSES – RESIDENTIAL

What are Moving Expenses? Moving costs or moving expenses include the costs of:

1. Transportation of displaced person and personal property
2. Dismantling
3. Disconnecting
4. Crating, Uncrating
5. Packing, Unpacking
6. Loading
7. Insuring
8. Temporary Storage
9. Unloading
10. Reinstalling of personal property, including service charges in connection with such reinstalling; temporary lodging while being moved; and transportation of eligible persons.
11. Replacement value of personal property lost, stolen, or damaged.



Moving expenses do not normally include any addition, improvements, alterations or other physical changes in or to any structure in connection with moving personal property, except when required by law.

Who May Receive Moving Expenses? Dwelling occupants, business and farm operators, and nonprofit organizations may be eligible to claim these expenses.

Moving Expenses-Limit on Distance: Payments for moving are limited to a straight-line distance of 50 miles. Any additional mileage charges must be paid by the person being moved.

Storage and Temporary Lodging Costs-Limit on Time: If it is necessary for a person to store personal property or obtain temporary lodging, the Idaho Transportation Department will pay reasonable and necessary storage charges for no more than twelve (12) months and reasonable temporary lodging costs while goods are in transit.

The Relocation Agent must approve plans for storage and temporary lodging ***IN ADVANCE***. Be sure to make this contact before moving.

Can I Move in Advance of Purchase of My Dwelling or Place of Business? *Do Not Move In Advance.* In order to be eligible for any benefits described in this brochure, you must be in lawful occupancy at the start of negotiations for the property to be acquired by the State, or have been ordered in writing to vacate your present residence or business.

If you own or rent a residential dwelling, you may be eligible for a fixed payment based on "Room Count," or the "Actual Cost" of moving your household goods. You may choose the best method for you.

Option 1: **What Does Fixed Payment "Room Count" Mean?** The "Room Count" method has nothing to do with actual costs of moving and requires no proof of expenses. It is particularly suitable for occupants who wish to move themselves. The payments are based on the number of rooms of furniture or personal belongings. If you are the owner of a dwelling or are renting an unfurnished dwelling (you own the furniture) and:

If the Certified Number of Rooms is:	Your Moving Payment will be:
1	$400
2	$550
3	$700
4	$850
5	$950
6	$1050
7	$1150
8	$1250
For Each Additional Room Add:	$100

If you are renting a furnished house, apartment or sleeping room (you do not own the furniture) your payment will be $300 for the first room and $50 for each additional room.

How to Claim the "Room Count" Payment: A few days before you move, you must notify your Relocation Agent so the agent can count and certify the number of rooms for which you can be paid.

Which Claim Form to Use for "Room Count" Payment?

1. After you have moved, fill out the claim form provided by the Relocation Agent. Your Relocation Agent will assist you in completing the form if needed.
2. Mail the form to the Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, ID 83707-1129

When to Claim Payment: You should file a claim for your "Room Count" moving costs as soon as you have moved. The claim must be filed within eighteen (18) months after you vacate the displacement dwelling.

Option 2: **What does "Actual Cost" mean?** Instead of the "Room Count" method, you may choose the "Actual Cost" method which provides for payment of actual reasonable expenses of moving up to 80 kilometers (50 miles), by a licensed commercial mover.

If you choose the "Actual Cost" method, your Relocation Agent will give you a letter authorizing the move and you must do the following:

1. Contact a licensed commercial mover;
2. Move, pay the mover, and get receipted bills;
3. Fill out the claim form provided. Attach the paid bills from the moving company and others to the claim form. Your Relocation Agent will assist you, if needed;
4. Mail to the Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, ID 83707-1129.

When to Claim "Actual Cost" move Expenses: You should file your claim as soon as you have moved and paid the mover. The claim must be filed within eighteen (18) months after you complete your move.



When May I Expect payment? You should receive payment within thirty (30) days after your moving cost claim is approved.

What About Mobile Home Residents in an Established Mobile Home Park or Elsewhere? Owner-Occupants may be eligible for the "Actual Cost" of moving such homes to new sites.

Tenants of mobile homes or owner-occupants who move only their personal property will be allowed moving payments the same as occupants of other dwellings.

If the displaced person owns some or all of the furniture, Option 1 will apply with the room count based on quantities of household furniture, equipment, and personal property "common" to a permanent dwelling.

A few days before you move, your Relocation Agent must certify the number of rooms to be moved.

1. After you have moved, fill out the claim form provided.
2. Mail the form to the Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, Idaho, 83707-1129.
3. The claim must be filed within eighteen (18) months after you move.

REPLACEMENT HOUSING PAYMENTS

Owner-occupants and tenants who are displaced from houses, apartments, mobile homes, or sleeping rooms may be eligible for a Replacement Housing Payment in addition to moving costs.

There are three (3) kinds of payments:

1. Housing Supplement
2. Rent Supplement
3. Down Payment Supplement

These supplemental payments are to assure that all displaced persons will have enough money to buy or rent replacement housing which is at least as good as they had before and which also meets Decent, Safe, and Sanitary (D.S.& S.) standards.

• Housing Supplement

What is a Housing Supplement? An owner-occupant of a dwelling may be eligible to receive a payment representing the difference, if any, between the price the Idaho Transportation Department paid for the displacement dwelling and the price to purchase a functionally equivalent dwelling. This is not extra compensation for the improvement acquired by the Department, but a supplement to assist in purchasing a substitute home.

Who is Eligible for a Housing Supplement? To be eligible for a Housing Supplement, a displaced person must:

1. Have actually owned and occupied the displacement dwelling for at least one hundred-eighty (180) days before the Idaho Transportation Department made its first offer; and

2. Purchase and occupy a Decent, Safe, and Sanitary dwelling within one (1) year after receiving final payment for the displacement dwelling unit acquired by the Idaho Transportation Department.

How Will the Amount of This Payment be Determined?

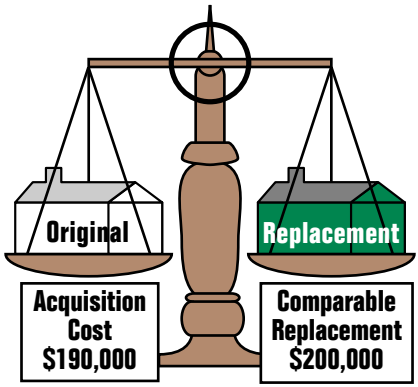
1.) — A study will be made by the Idaho Transportation Department to find the market selling price of a Decent, Safe, and Sanitary dwelling functionally equivalent to your own.

If the price paid to you for your dwelling is lower than the price found by the study, the difference is the maximum Housing Supplement. The final amount of the supplement will be computed from the amount actually paid for the replacement home but normally not more than the maximum.

2.) — If the dwelling you owned and occupied was mortgaged for not less than one hundred-eighty (180) days before the State's first offer to purchase, you may be entitled to an increased interest payment if the mortgage on the replacement dwelling has a higher rate of interest than the mortgage on the displacement dwelling.

3.) — You may also receive reimbursement for reasonable expenses incurred for title search, recording fees, and other closing costs connected with the purchase of the replacement dwelling, but not including prepaid expenses.

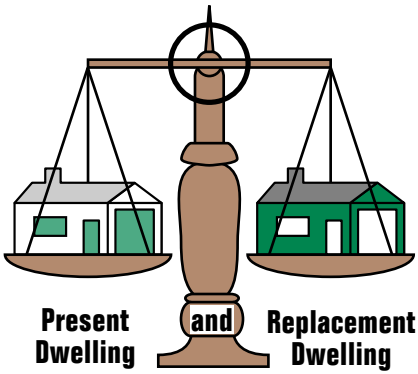
The total supplemental payment for replacement housing (the total of 1,2 & 3 above) normally cannot exceed $22,500.



COMPARABLE

Price Differential Payment may be any amount up to $10,000

A written statement of the maximum amount of the housing supplement, if any (Part 1 of this payment), will be given to you at the time the Idaho Transportation Department purchases your property. The amount for Parts 2 and 3, if any, will depend on the details of the purchase of a replacement home. The total cannot normally exceed $22,500.



are functionally similar

What is Meant by Comparable Replacement Dwelling? A comparable replacement shall be "functionally equivalent" to the displacement dwelling, providing the same utility. While a comparable replacement dwelling need not possess every feature of the displacement dwelling the principal features must be present.

Be Careful! The Idaho Transportation Department is required by law to certify that the home you purchase and occupy is Decent, Safe, and Sanitary in order for you to be eligible for the supplement.

On request, the Idaho Transportation Department will inspect any dwelling you may wish to purchase to determine whether or not it qualifies you for supplemental payments.

When Can I File a Claim? You may file a claim for the supplement payment any time after you have purchased and occupied a Decent, Safe, and Sanitary dwelling. However, you must file your claim no later than eighteen (18) months after the date on which you were required to vacate the displacement dwelling.

If You Prefer to Rent Rather Than Buy: If you are a displaced home owner who is qualified for a Housing Supplement but plan to rent rather than buy, you may qualify for a Rent Supplement payment.

How Will the Amount of the Rent Supplement be Determined? The Rent Supplement which normally cannot exceed $5,250, will be forty-two (42) times the difference between:

1. The amount necessary to rent a Decent, Safe, and Sanitary replacement dwelling functionally equivalent to the displacement dwelling; and

2. The fair rental value of the displacement dwelling.

• Rent Supplement

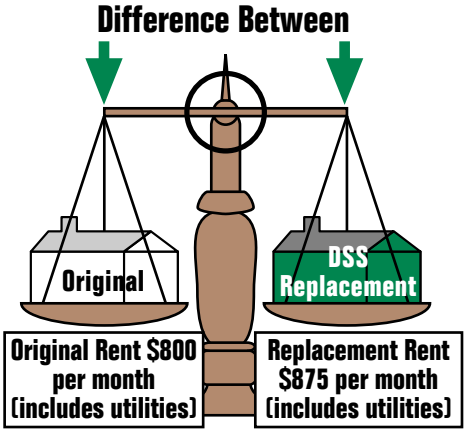
What Are Rent Supplements? Eligible tenants and short-term owner-occupants who choose to rent rather than to buy may qualify for a Rent Supplement if the fair rental value of the displacement dwelling is less than the amount required to rent an available, functionally equivalent, Decent, Safe, and Sanitary replacement dwelling.

How Will the Amount of the Payment be Determined? The Rent Supplement, which normally cannot exceed $5,250, will be forty-two (42) times the difference between:

1. The base rent for a replacement dwelling; and
2. The base rent for your current dwelling.

The amount of rent used in 1 above shall be the lesser of:

1. The amount computed by the State as necessary to rent a replacement dwelling; or
2. The rent the displaced person actually pays for a replacement dwelling.



COMPARABLE

Total Rental Assistance Up to 42 Months - $3,150

Such Rental Supplements, when added to your present rent payments, will enable you to rent qualifying housing for up to forty-two (42) months.

What Must I Do to Qualify? You must rent and occupy a Decent, Safe, and Sanitary dwelling within one year after you vacate the displacement dwelling acquired by the State.

On request, the Idaho Transportation Department will have an inspection made of any dwelling you may wish to rent to determine whether it qualifies you for supplemental rent payments.

Who Determines the Amount of the Rent Supplement? The amount necessary to rent Decent, Safe, And Sanitary accommodations functionally equivalent to the displacement dwelling will be determined by the Idaho Transportation Department from a study of available accommodations in your community or surrounding area.

When Can I File a Claim? You may file a claim for the supplement payment any time after you have rented and occupied a Decent, Safe, and Sanitary dwelling. However, you must file your claim no later than eighteen (18) months after the date on which you vacate the displacement dwelling.

• Down Payment Supplement

What Are Down Payment Supplements?

Eligible tenants and short-term owner-occupants who choose to buy rather than to rent may receive a Down Payment Supplement. The payment, not to exceed $5,250, will be the amount normally required as a down payment on a comparable dwelling if such purchase were financed by a conventional mortgage.



The Down Payment Supplement will be limited to the lesser of:

1. Required down payment for a comparable dwelling; or
2. Required down payment for a replacement dwelling; or
3. Amount computed as rent supplement; or
4. Actual down payment made on a replacement dwelling.

Subject to the above limits, your payment may include reimbursement for reasonable expenses incurred for title search, recording fees, and other closing costs connected with the purchase of the replacement dwelling.

What Must I Do to Qualify? To receive a Down Payment Supplement, you must purchase and occupy a Decent, Safe, and Sanitary dwelling within one (1) year after:

1. *For a Tenant*, the date you vacate the acquired dwelling; or
2. *For an Owner-Occupant*, the latter of:
   the date you receive final payment or
   the date you vacate the acquired dwelling.

DECENT, SAFE, AND SANITARY DWELLING

What is Meant by a Decent, Safe, and Sanitary Dwelling? A qualifying house, apartment, or mobile home is one that meets Decent, Safe, and Sanitary standards which are described as follows:

1. Conforms to local housing, and occupancy codes for existing structures;

2. Has continuing and adequate supply of potable water;

3. Has kitchen with hot and cold water and sink with sewage connections. Must have areas for stove and refrigerator with available utility connections;

4. Has adequate heating system which will maintain a minimum temperature of 21°C (70°F) in the living area under normal weather conditions;

5. Has a separate, well-lighted and ventilated bathroom that provides privacy to the user; contains a sink, bathtub or shower stall, and a toilet; all in good working order and properly connected to appropriate sources of water and sewage drainage system;

6. Has an adequate and safe wiring system for lighting and other electrical services;

7. Is structurally sound, weather tight, in good repair and adequately maintained;

8. Has a safe unobstructed exit leading to a safe open space at ground level;

9. Meets the following standards of habitable floor space:
   a. 14 square meters (150 square feet) for the first occupant; and
   b. At least 9 square meters (100 square feet) for each additional occupant, or 7 square feet (70 square feet) if a mobile home.

Habitable floor space means the part used for sleeping, living, cooking, and dining, and does not include closets, pantries, bathroom, service or utility rooms, hallways, foyers, unfurnished attics, storage spaces, cellars, and similar spaces. In addition, the floor space must be divided into sufficient rooms to be adequate for the family. All rooms must be adequately ventilated.

A qualifying sleeping room is one which is located in a building which meets the minimum requirements of items 1,4,6,7, and 8 listed above and meets the following additional requirements:

1. Has 9 square meters (100 square feet) of floor space for the first occupant and 5 square meters (50 square feet) of floor space for each additional occupant;

2. Has available lavatory and toilet facilities that provide privacy, including a door that can be locked, if facilities are separate from the room.

Who May Be Eligible? A *long-term owner-occupant* is one who has owned and occupied a dwelling for at least one hundred-eighty (180) days before the State made its first written offer. As a long-term owner-occupant, you may be eligible for a Housing Supplement if you buy or a Rent Supplement if you rent.

A short-term owner-occupant is one who has owned and occupied a dwelling for less than one hundred-eighty days, but not less than ninety (90) days from the State's first written offer. As a short-term owner-occupant, you may be eligible for a Down Payment Supplement if you buy or a Rent Supplement if you rent.

A *tenant* who has legally occupied a dwelling for not less than ninety (90) days before the State's written offer to purchase the property, may be entitled to a Down Payment Supplement if the tenant buys, or a Rent Supplement if the tenant rents.

CLAIMING SUPPLEMENTAL PAYMENTS

How to Claim Payment for Replacement Housing Supplement or Rent Supplement:

You will be advised personally of the benefits for which you may be eligible under the Relocation Assistance Program.

1. A form letter will also notify you of the amount of either of the foregoing supplements to which you may be entitled. Fill out the claim forms provided. Your Relocation Agent will assist you if needed.

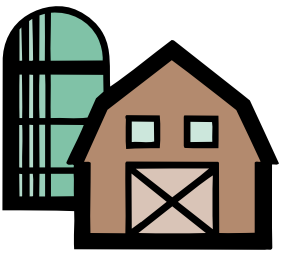
2. Mail to: Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, Idaho, 83707-1129. Remember: The time limit for filing a claim is eighteen (18) months after you vacate the displacement dwelling.

3. Upon receipt of your claim, your Relocation Agent will certify that you have moved to a Decent, Safe, and Sanitary dwelling and submit your claim for processing.

When May I Expect Payment of Either Claim? You should receive payment within thirty (30) days after your claim is approved.

MOVING EXPENSES–BUSINESS, FARM, OR NONPROFIT

If you are a Business Operator, Farm Operator, or Nonprofit Organization, you may be eligible for an "Actual Cost" moving payment or an "Agreed Self Move" expense payment, or a "Displaced Business" (Farm Operation or Nonprofit Organization) payment depending upon the particular circumstances of your case. You may choose the method best for you.



What is a "Business Operator"? The term business operator means any person involved in any lawful activity, except a farm operation, conducted primarily:

1. For the purchase, sale, lease and/or rental of personal and/or real property, and/or for the manufacture, processing, and/or marketing of products, commodities, and/or any other personal property; or
2. Primarily for the sale of services to the public; or
3. By a nonprofit organization

Some moving and related expenses may be payable when outdoor advertising displays are required to be moved.

What is a "Farm Operator"? A farm operator is any person who conducts any activity solely or primarily for the production of one or more agricultural products or commodities, including timber, for sale or home use and in sufficient quantity as to contribute materially to the operator's support. This means that the farm operation contributes at least one-third of the operator's income.

What if Only Part of My Business or Farm Operation Must be Moved? If only part of your business or farm must be moved, you may be eligible to receive the actual cost of moving personal property of the business or farm out of the area required for the highway.

• "Actual Costs" Move

Most displaced businesses, farms, or nonprofit organizations can claim:

1. Actual reasonable and necessary costs of moving inventory, machinery, office equipment, and similar business related personal property, up to a distance of 80 kilometers (50 miles). There is no dollar limit on this amount, but every dollar claimed must be supported by a receipted bill.

2. Actual direct loss of tangible personal property as a result of moving or discontinuing a business, farm operation, or nonprofit organization, but not to exceed the cost of moving the item.

3. Purchase of substitute personal property subject to certain limitations.

4. Actual reasonable expenses in looking for a replacement business or farm site, not to exceed $2,500.

5. Certain actual reestablishment expenses, not to exceed $10,000.

When to Claim Actual Moving Costs: You should file your claim as soon as you have moved and paid the mover. The claim must be filed within eighteen (18) months after removal of the personal property, or the date the business operation vacated the premises, whichever is later.

How to Claim Payment for Your Moving Costs: Fill out the claim form provided. Your Relocation Agent will assist you if needed. Attach the paid bills from the moving company and any others to the claim form. Mail to: Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, Idaho, 83707-1129.

If you choose the "Actual Cost" method, you must do the following:



1. Prepare the certified inventory of the items to be moved;
2. Have your Relocation Agent obtain two estimates from licensed moving companies;
3. Provide your Relocation Agent with reasonable advance written notice of the approximate move date;
4. Move, pay the mover, get receipted bills;
5. Prepare the certified inventory of the items that were moved;
6. Fill out the claim form provided. Attach the paid bills from the moving company and any others to the claim form. Your Relocation Agent will assist you if needed.
7. Mail to: Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, Idaho, 83707-1129.

When May I Expect Payment? You should receive payment within thirty (30) days after your moving cost claim is approved.

Instead of "Actual Cost" payments, some businesses, farms, or nonprofit organizations may elect to receive an "Agreed Self Move" payment or a "Displaced Business (Farm Operation or Nonprofit Organization)" payment.

• Agreed Self Move

What is the "Agreed Self Move Expense"? This is an alternate procedure applicable only to businesses, farms, or nonprofit organizations who wish to move through their own efforts and utilizing their own equipment. It is an amount negotiated between the State and the business, farm, or nonprofit organization, not to exceed the lower of two estimates obtained by the State.

How Does the "Agreed Self Move" Payment Work?

1. *Before you are ready to move*, advise your Relocation Agent, you are interested in a Self Move. Prepare a certified inventory of the items to be moved.

2. The State will obtain two estimates from licensed moving companies and/or specialists (depending on the nature of the items to be moved).

3. You will then be contacted for the purposes of negotiating an agreed amount to cover the cost of moving through your own efforts. Upon reaching an agreement, you will be authorized to move.

4. Upon completion of your move, prepare a certified inventory of the items that were moved. Then advise your Relocation Agent you have moved. Fill out the claim form provided. It must be filed within eighteen (18) months after the move is completed. Your Relocation Agent will assist you, if needed.

5. Your claim will be reviewed and approved on the basis upon which you and the State previously agreed.

• Fixed Payment ("in lieu")

What is a "Fixed Payment" for Moving Expenses (in lieu)? Instead of "Actual Cost" or the "Agreed Self Move" moving expense payments, and Re-establishment expense payment, you may ask to be paid an amount equal to the average annual net earnings of the business or farm. Expect that such payment shall not be less than $1,000 nor more than $20,000. Nonprofit organizations are also eligible for a fixed payment. However, such payment is calculated differently than business and farm operations. Contact your Relocation Agent for more specific information.

What qualifies a Business for the Fixed Payment ("in lieu")? For a business to be eligible, the Idaho Transportation Department must determine that:

1. The business owns or rents personal property which must be moved in connection with such displacement, and for which an expense would be incurred in such move, and the business vacates or relocates from its displacement site; and

2. The business cannot be relocated without substantial loss of patronage, as measured by a substantial decrease in the dollar volume of business; and

3. The business is not part of a commercial enterprise having at least three other establishments which are not being acquired and which are engaged in the same or similar business; and

4. The business contributes materially to the income of the displaced owner; and

5. The business is not operated at a displacement dwelling for the purpose of renting such dwelling or site to others.

What qualifies a Farm Operation for the Fixed Payment? For a farm to be eligible to choose this option:

1. The farm operator must have discontinued or relocated his entire farm operation at the present location; or

2. The partial acquisition caused a substantial change in the nature of the farm operation.

What Are Average Annual Net Earnings? Average annual net earnings are one-half of any net earning of the business or farm operation, before Federal, State or Local income taxes, during the two taxable years immediately preceding the taxable year in which the business or farm operation is displaced.

How Are Average Annual Net Earnings Determined? You may support earnings by submitting copies of State or Federal income tax returns or a certified financial statement.

For the purposes of this allowance, these net earnings will include compensation paid by the business or farm to the owner or the owner's family during the two-year period. In the case of a corporation, net shall include compensation paid to the spouse or dependents of the owner of a majority interest in the corporation.

Example:

	2002	**2003**	**2004**
	Annual Net Earnings $25,000.00	Annual net Earnings $28,000.00	Year Displaced
Average -	$26,500.00 = Fixed Payment		

How to Claim a "Fixed Payment" Moving Expense: Fill out the claim form provided. Your Relocation Agent will assist you, if needed.

Mail to: Idaho Transportation Department, Right of Way Section,
P.O. Box 7129, Boise, Idaho, 83707-1129.

When May I Expect Payment? You should receive payment within thirty (30) days after your claim is approved.

• Re-Establishment Expenses

What is a Re-establishment Expense? A business, farm, or non-profit organization may be eligible to receive up to $10,000 for certain kinds of actual expenses necessary to re-establish the business or farm operation. Eligible expenses must be reasonable and necessary. The agency will determine the limits of the various kinds of expenses. The expenses may include, but are not limited to the following:

- Repairs or improvements to the replacement property as required by code or ordinance.
- Modification to the replacement property to accommodate the business operation.
- Construction and installation costs for exterior signing.
- Advertisement of replacement location.
- Estimated increased costs of operation during the first two (2) years at the replacement site.

• Some Ineligible Relocation Expenses:

1. The cost of moving items not considered to be personal property.
2. Loss of good will, profits, or trained employees.
3. Personal injury.
4. Legal fees for any appeal of your relocation benefits.
5. Costs for storage on property already owned by you.

ADVERTISING SIGNS

If you have a sign that has to be moved from the right of way, the Relocation Agent will obtain two bids from licensed sign companies. The bids will contain the depreciated reproduction cost of the sign and estimated cost of moving the sign. The lesser of the two is the amount of compensation you will receive to move your sign.

How to Claim a Sign Moving Expense: Fill out the claim form provided. Your Relocation Agent will assist you, if needed.



Mail to: Idaho Transportation Department, Right of Way Section, P.O. Box 7129, Boise, Idaho, 83707-1129.

When May I Expect Payment? You should receive payment within thirty (30) days after your claim is approved.

APPEAL

What if a Person is Denied a Payment or Believes it Should be Greater? If you have been denied a payment or eligibility for assistance you believe you should receive, you should write to the District Engineer at the District Office address shown on page 20. You must make your appeal within sixty (60) days from the date you received notice of the State's initial determination. Your letter should state all the facts as to why you disagree with the State's determination. The District Engineer will promptly and carefully review the facts of the case and notify you of the decision within a few days.

If you are still dissatisfied after this first review of your case, you may appeal to the Chief Engineer of the Idaho Transportation Department, the address is: Idaho Transportation Department, P.O. Box 7129, Boise, Idaho, 83707-1129.

This appeal must be made within thirty (30) days after receiving the decision from the District Engineer. The Chief Engineer will set up an appeal hearing to review all pertinent facts. You have the right to be represented by legal counsel at the hearing solely at your expense. You also have the right to review and copy all non-confidential material pertinent to your appeal. The Chief Engineer will notify you in writing of the appeal results.

An alien not lawfully present in the United States shall not be eligible to receive relocation payments or any other assistance provided under 49 CFR Part 24 of the Uniform Act.

IDAHO TRANSPORTATION DEPARTMENT DISTRICT OFFICES

District No. One
600 West Prairie
Coeur d'Alene, ID
83815-8767
Phone: (208) 772-1200

District No. Two
PO Box 837
(2600 North and South Highway)
Lewiston, ID
83501-0837
Phone: (208) 799-5090

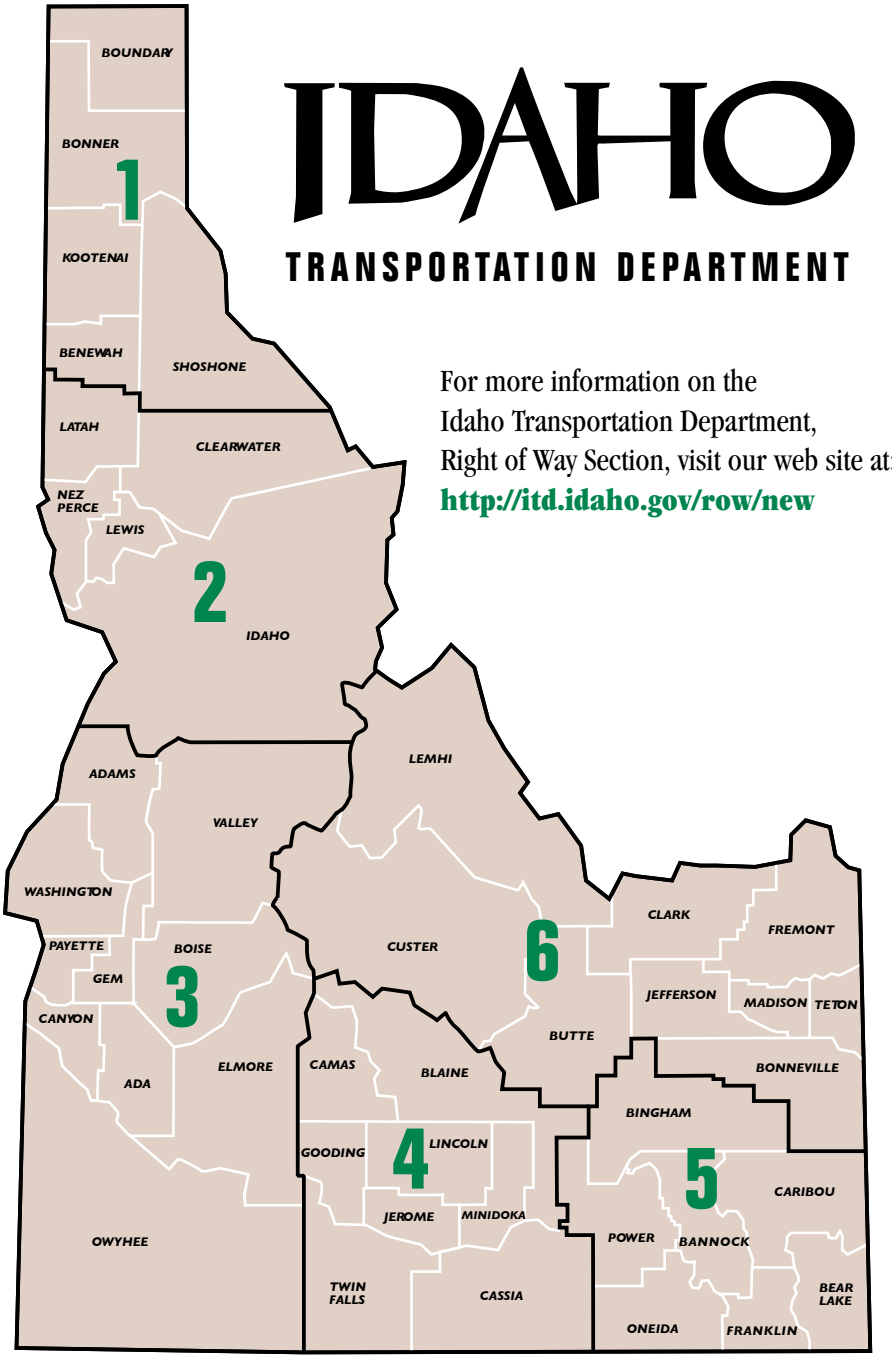
District No. Three
PO Box 8028
(8150 Chinden Blvd.)
Boise, ID
83707-2028
Phone: (208) 334-8300

District No. Four
PO Box 2-A
(216 Date Street)
Shoshone, ID
83352-0820
Phone: (208) 886-7800

District No. Five
PO Box 4700
(5151 South 5th Street)
Pocatello, ID
83205-4700
Phone: (208) 239-3300

District No. Six
PO Box 97
(206 North Yellowstone)
Rigby, ID
83442-0097
Phone: (208) 745-7781

Administrative District Boundaries



IDAHO

TRANSPORTATION DEPARTMENT

For more information on the
Idaho Transportation Department,
Right of Way Section, visit our web site at:
http://itd.idaho.gov/row/new


IDAHO
TRANSPORTATION DEPARTMENT

APPENDIX 6. HORIZONTAL AND VERTICAL ALIGNMENT CALCULATIONS

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ALIGNMENT ALTERNATE W-4
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

BEGIN ALIGNMENT W-4	**Station: 43+71.58 – Elevation 2770.92**
Grade:	**1.32% (Station 43+71.58 – Station 70+00.00)**
Length of Grade (Feet):	**2624.43**

Vertical PC:	**Station 70+00.00 – Elevation 2806.30**
Vertical PT:	**Station 80+00.00 – Elevation 2830.37**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**3.49% (Station 80+00.00 – Station 93+00.00)**
Length of Grade (Feet):	**1300.00**

Vertical PC:	**Station 93+00.00 – Elevation 2875.83**
Vertical PT:	**Station 113+00.00 – Elevation 2861.80**
Vertical Curve Length (Feet):	**2000.00 (Crest Vertical Curve)**
PEAK ELEVATION FOR W-4 – APPROX. STATION 101+30 – ELEVATION 2890.39.	
Reisenauer Hill - Approx. Station 105+00.	

Grade:	**-4.90% (Station 113+00.00 – Station 150+00.00)**
Length of Grade (Feet):	**3700.00**

Vertical PC:	**Station 150+00.00 – Elevation 2680.50**
Vertical PT:	**Station 160+00.00 – Elevation 2646.00**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**
Eid Road - Approx. Station 156+00.	

Grade:	**-2.00% (Station 160+00.00 – Station 177+00.00)**
Length of Grade (Feet):	**1700.00**

Vertical PC:	**Station 177+00.00 – Elevation 2612.00**
Vertical PT:	**Station 187+00.00 – Elevation 2598.07**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**-0.79% (Station 187+00.00 – Station 205+00.00)**
Length of Grade (Feet):	**1800.00**
Jacksha Road - Approx. Station 195+00	

Vertical PC:	**Station 205+00.00 – Elevation 2583.93**
Vertical PT:	**Station 215+00.00 – Elevation 2590.97**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**
Leave Existing US-95 - Approx. Station 210+00	

ALIGNMENT ALTERNATE W-4
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

Grade:	**2.19% (Station 215+00.00 – Station 233+00.00)**
Length of Grade (Feet):	**1800.00**

Vertical PC:	**Station 233+00.00 – Elevation 2630.45**
Vertical PT:	**Station 243+00.00 – Elevation 2647.66**
Vertical Curve Length (Feet):	**1000.00 (Crest Vertical Curve)**

Grade:	**1.25% (Station 243+00.00 – Station 245+00.00)**
Length of Grade (Feet):	**200.00**
Structure over Snow Road – Approx. Station 244+00.	

Vertical PC:	**Station 245+00.00 – Elevation 2650.16**
Vertical PT:	**Station 255+00.00 – Elevation 2642.30**
Vertical Curve Length (Feet):	**1000.00 (Crest Vertical Curve)**

Grade:	**-2.82% (Station 255+00.00 – Station 265+00.00)**
Length of Grade (Feet):	**1000.00**

Vertical PC:	**Station 265+00.00 – Elevation 2614.10**
Vertical PT:	**Station 275+00.00 – Elevation 2617.00**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**3.40% (Station 275+00.00 – Station 310+00.00)**
Length of Grade (Feet):	**3500.00**

Vertical PC:	**Station 310+00.00 – Elevation 2736.00**
Vertical PT:	**Station 330+00.00 – Elevation 2736.14**
Vertical Curve Length (Feet):	**2000.00 (Crest Vertical Curve)**

Grade:	**-3.39% (Station 330+00.00 – Station 375+00.00)**
Length of Grade (Feet):	**4500.00**

Vertical PC:	**Station 375+00.00 – Elevation 2583.78**
Vertical PT:	**Station 385+00.00 – Elevation 2562.55**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**-0.86% (Station 385+00.00 – Station 397+17.35)**
Length of Grade (Feet):	**1217.35**
Tie into Existing US-95 (Near Grain Elevators) – Approx. Station 387+00	
END ALIGNMENT W-4:	**Station: 397+17.35 – Elevation 2555.50**

ALIGNMENT ALTERNATE W-4
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

BEGIN ALIGNMENT W-4	**Station: 43+71.58**
Bearing Direction:	**N 18° 53' 53" W**
Length (Feet):	**161.28 (Station 43+71.58 – Station 45+32.85)**

PC:	**Station 45+32.85**
PT:	**Station 50+77.35**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Feet):	**1° 15' 33"**
Curve Length (Feet):	**544.50**

Bearing Direction:	**N 12° 02' 29" W**
Length (Feet):	**2588.49 (Station 50+77.35 – Station 76+65.84)**

PC:	**Station 76+65.84**
PT:	**Station 86+51.95**
Curve Radius (Feet):	**2910.00**
Degree of Curve (Feet):	**1° 58' 08"**
Curve Length (Feet):	**986.11**

Bearing Direction:	**N 7° 22' 28" W**
Length (Feet):	**1225.25 (Station 86+51.95 – Station 98+77.20)**

PC:	**Station 98+77.20**
PT:	**Station 117+49.72**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Feet):	**2° 48' 31"**
Curve Length (Feet):	**1872.52**

Reisenauer Hill - Approx. Station 105+00.

Bearing Direction:	**N 45° 13' 02" W**
Length (Feet):	**716.48 (Station 117+49.72 – Station 124+66.20)**

PC:	**Station 124+66.20**
PT:	**Station 137+68.97**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Feet):	**2° 48' 31"**
Curve Length (Feet):	**1302.77**

Bearing Direction:	**N 8° 37' 39" W**
Length (Feet):	**599.66 (Station 137+68.97 – Station 143+68.63)**

ALIGNMENT ALTERNATE W-4
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

PC:	**Station 143+68.63**
PT:	**Station 154+97.79**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Feet):	**2° 48' 31"**
Curve Length (Feet):	**1129.16**

Bearing Direction:	**N 40° 20' 29" W**
Length (Feet):	**755.62 (Station 154+97.79 – Station 162+53.41)**
Eid Road - Approx. Station 156+00.	

PC:	**Station 162+53.41**
PT:	**Station 173+05.69**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Feet):	**1° 15' 33"**
Curve Length (Feet):	**1052.28**

Bearing Direction:	**N 53° 35' 32" W**
Length (Feet):	**1460.53 (Station 173+05.69 – Station 187+66.22)**

PC:	**Station 187+66.22**
PT:	**Station 246+96.55**
Curve Radius (Feet):	**5580.00**
Degree of Curve (Feet):	**1° 01' 37"**
Curve Length (Feet):	**5930.33**
Jacksha Road - Approx. Station 195+00.	
Leave Existing US-95 - Approx. Station 210+00.	
Structure over Snow Road – Approx. Station 244+00.	

Bearing Direction:	**N 7° 18' 03" E**
Length (Feet):	**5575.80 (Station 246+96.55 – Station 302+72.35)**

PC:	**Station 302+72.35**
PT:	**Station 343+72.04**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Feet):	**1° 15' 33"**
Curve Length (Feet):	**4099.70**

Bearing Direction:	**N 58° 55' 34" E**
Length (Feet):	**3465.78 (Station 343+72.04 – Station 378+37.82)**

PC:	**Station 378+37.82**
PT:	**Station 387+22.32**
Curve Radius (Feet):	**1040.00**
Degree of Curve (Feet):	**5° 30' 33"**
Curve Length (Feet):	**884.50**
Tie into Existing US-95 (Near Grain Elevators) – Approx. Station 387+00.	

ALIGNMENT ALTERNATE W-4
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

Bearing Direction:	**N 10° 11' 50" E**
Length (Feet):	**995.04 (Station 387+22.32 – Station 397+17.35)**
END ALIGNMENT W-4:	**STATION 397+17.35**

ALIGNMENT ALTERNATE C-3
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

BEGIN ALIGNMENT C-3	**Station: 43+71.58 – Elevation 2770.92**
Grade:	**1.23% (Station 43+71.58 – Station 60+50.00)**
Length of Grade (Feet):	**1678.42**

Vertical PC:	**Station 60+50.00 – Elevation 2791.53**
Vertical PT:	**Station 65+50.00 – Elevation 2798.65**
Vertical Curve Length (Feet):	**500.00 (Sag Vertical Curve)**

Grade:	**1.62% (Station 65+50.00 – Station 71+00.00)**
Length of Grade (Feet):	**550.00**

Vertical PC:	**Station 71+00.00 – Elevation 2807.54**
Vertical PT:	**Station 79+00.00 – Elevation 2827.69**
Vertical Curve Length (Feet):	**800.00 (Sag Vertical Curve)**

Grade:	**3.42% (Station 79+00.00 – Station 97+00.00)**
Length of Grade (Feet):	**1800.00**

Vertical PC:	**Station 97+00.00 – Elevation 2889.32**
Vertical PT:	**Station 107+00.00 – Elevation 2882.50**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**
PEAK ELEVATION FOR C-3 – APPROX. STATION 101+20 – ELEVATION 2896.46.	
Reisenauer Hill – Approx. Station 105+00.	

Grade:	**-4.79% (Station 107+00.00 – Station 120+00.00)**
Length of Grade (Feet):	**1300.00**

Vertical PC:	**Station 120+00.00 – Elevation 2820.28**
Vertical PT:	**Station 130+00.00 – Elevation 2773.07**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**-4.66% (Station 130+00.00 – Station 155+00.00)**
Length of Grade (Feet):	**2500.00**

Vertical PC:	**Station 155+00.00 – Elevation 2656.68**
Vertical PT:	**Station 165+00.00 – Elevation 2645.33**
Vertical Curve Length (Feet):	**1000.00 (Crest Vertical Curve)**
Eid Road – Approx. Station 156+00.	
Leave Existing US-95 – Approx. Station 165+00.	

Grade:	**2.39% (Station 165+00.00 – Station 185+00.00)**
Length of Grade (Feet):	**2000.00**

ALIGNMENT ALTERNATE C-3
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

Vertical PC:	**Station 185+00.00 – Elevation 2693.07**
Vertical PT:	**Station 195+00.00 – Elevation 2693.10**
Vertical Curve Length (Feet):	**1000.00 (Crest Vertical Curve)**

Grade:	**-2.38% (Station 195+00.00 – Station 207+50.00)**
Length of Grade (Feet):	**1250.00**

Vertical PC:	**Station 207+50.00 – Elevation 2663.35**
Vertical PT:	**Station 217+50.00 – Elevation 2656.45**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**1.00% (Station 217+50.00 – Station 222+50.00)**
Length of Grade (Feet):	**500.00**
Structure over Zeitler Road – Approx. Station 220+00.	

Vertical PC:	**Station 222+50.00 – Elevation 2661.45**
Vertical PT:	**Station 232+50.00 – Elevation 2677.45**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**2.20% (Station 232+50.00 – Station 240+00.00)**
Length of Grade (Feet):	**750.00**

Vertical PC:	**Station 240+00.00 – Elevation 2693.99**
Vertical PT:	**Station 250+00.00 – Elevation 2726.94**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**4.39% (Station 250+00.00 – Station 265+00.00)**
Length of Grade (Feet):	**1500.00**

Vertical PC:	**Station 265+00.00 – Elevation 2792.76**
Vertical PT:	**Station 275+00.00 – Elevation 2789.70**
Vertical Curve Length (Feet):	**1000.00 (Crest Vertical Curve)**

Grade:	**-5.00% (Station 275+00.00 – Station 295+00.00)**
Length of Grade (Feet):	**2000.00**
Tie into Existing US-95 (Clyde Hill) – Approx. Station 285+00.	

Vertical PC:	**Station 295+00.00 – Elevation 2689.70**
Vertical PT:	**Station 305+00.00 – Elevation 2646.20**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**-3.70% (Station 305+00.00 – Station 310+00.00)**
Length of Grade (Feet):	**500.00**

ALIGNMENT ALTERNATE C-3
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

Vertical PC:	**Station 310+00.00 – Elevation 2627.70**
Vertical PT:	**Station 320+00.00 – Elevation 2599.20**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**-2.00% (Station 320+00.00 – Station 325+00.00)**
Length of Grade (Feet):	**500.00**

Vertical PC:	**Station 325+00.00 – Elevation 2589.20**
Vertical PT:	**Station 335+00.00 – Elevation 2574.20**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Grade:	**-1.00% (Station 335+00.00 – Station 343+00.00)**
Length of Grade (Feet):	**800.00**

Vertical PC:	**Station 343+00.00 – Elevation 2566.20**
Vertical PT:	**Station 347+00.00 – Elevation 2562.93**
Vertical Curve Length (Feet):	**400.00 (Sag Vertical Curve)**

Grade:	**-0.63% (Station 347+00.00 – Station 351+00.00)**
Length of Grade (Feet):	**400.00**

Vertical PC:	**Station 351+00.00 – Elevation 2560.40**
Vertical PT:	**Station 355+00.00 – Elevation 2557.47**
Vertical Curve Length (Feet):	**400.00 (Crest Vertical Curve)**

Grade:	**-0.83% (Station 355+00.00 – Station 357+37.06)**
Length of Grade (Feet):	**237.063**
END ALIGNMENT C-3:	**Station: 357+37.06 – Elevation 2555.50**

ALIGNMENT ALTERNATE C-3
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

BEGIN ALIGNMENT C-3	**Station: 43+71.58**
Bearing Direction:	**N 18° 53' 53" W**
Length (Feet):	**161.28 (Station 43+71.58 – Station 45+32.86)**

PC:	**Station 45+32.86**
PT:	**Station 50+77.36**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Right):	**1° 15' 33"**
Curve Length (Feet):	**544.50**

Bearing Direction:	**N 12° 02' 29" W**
Length (Feet):	**2588.49 (Station 50+77.36 – Station 76+65.85)**

PC:	**Station 76+65.85**
PT:	**Station 86+51.96**
Curve Radius (Feet):	**2910.00**
Degree of Curve (Right):	**1° 58' 08"**
Curve Length (Feet):	**986.11**

Bearing Direction:	**N 7° 22' 28" E**
Length (Feet):	**1225.25 (Station 86+51.96 – Station 98+77.21)**

PC:	**Station 98+77.21**
PT:	**Station 117+49.73**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Left):	**2° 48' 31"**
Curve Length (Feet):	**1872.52**

Reisenauer Hill - Approx. Station 105+00.

Bearing Direction:	**N 45° 13' 02" W**
Length (Feet):	**716.48 (Station 117+49.73 – Station 124+66.21)**

PC:	**Station 124+66.21**
PT:	**Station 137+68.98**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Right):	**2° 48' 31"**
Curve Length (Feet):	**1302.77**

Bearing Direction:	**N 8° 37' 39" W**
Length (Feet):	**599.66 (Station 137+68.98 – Station 143+68.64)**

ALIGNMENT ALTERNATE C-3
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

PC:	**Station 143+68.64**
PT:	**Station 154+97.80**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Left):	**2° 48' 31"**
Curve Length (Feet):	**1129.16**

Bearing Direction:	**N 40° 20' 29" W**
Length (Feet):	**548.84 (Station 154+97.80 – Station 160+46.65)**
Eid Road - Approx. Station 156+00.	

PC:	**Station 160+46.65**
PT:	**Station 174+58.06**
Curve Radius (Feet):	**2040.00**
Degree of Curve (Right):	**2° 48' 31"**
Curve Length (Feet):	**1411.41**
Leave Existing US-95 - Approx. Station 165+00.	

Bearing Direction:	**N 0° 42' 01" W**
Length (Feet):	**4905.32 (Station 174+58.06 – Station 223+63.38)**
Structure over Zietler Road – Approx. Station 220+00.	

PC:	**Station 223+63.38**
PT:	**Station 237+01.43**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Right):	**1° 15' 33"**
Curve Length (Feet):	**1338.05**

Bearing Direction:	**N 16° 08' 57" E**
Length (Feet):	**3920.44 (Station 237+01.43 – Station 276+21.87)**

PC:	**Station 276+21.87**
PT:	**Station 284+14.21**
Curve Radius (Feet):	**7660.00**
Degree of Curve (Left):	**0° 44' 53"**
Curve Length (Feet):	**792.34**

Bearing Direction:	**N 10° 13' 21" E**
Length (Feet):	**7322.85 (Station 284+14.21 – Station 357+37.06)**
Tie into Existing US-95 (Clyde Hill) - Approx. Station 285+00.	
END ALIGNMENT C-3:	**STATION 357+37.06**

ALIGNMENT ALTERNATE E-2
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

BEGIN ALIGNMENT E-2	**Station: 43+71.58 – Elevation 2770.92**
Grade:	**1.32% (Station 43+71.58 – Station 67+50.00)**
Length of Grade (Feet):	**2378.42**

Vertical PC:	**Station 67+50.00 – Elevation 2803.01**
Vertical PT:	**Station 82+50.00 – Elevation 2843.44**
Vertical Curve Length (Feet):	**1500.00 (Sag Vertical Curve)**

Grade:	**4.08% (Station 82+50.00 – Station 100+00.00)**
Length of Grade (Feet):	**1750.00**

Vertical PC:	**Station 100+00.00 – Elevation 2914.76**
Vertical PT:	**Station 130+00.00 – Elevation 2909.83**
Vertical Curve Length (Feet):	**3000.00 (Crest Vertical Curve)**
Reisenauer Hill and leave Existing US-95– Approx. Station 108+00.	

Grade:	**-4.40% (Station 130+00.00 – Station 133+00.00)**
Length of Grade (Feet):	**300.00**

Vertical PC:	**Station 133+00.00 – Elevation 2896.62**
Vertical PT:	**Station 141+00.00 – Elevation 2875.38**
Vertical Curve Length (Feet):	**800.00 (Sag Vertical Curve)**

Grade:	**-0.96% (Station 141+00.00 – Station 144+00.00)**
Length of Grade (Feet):	**300.00**
Structure over Eid Road – Approx. Station 142+00.	

Vertical PC:	**Station 144+00.00 – Elevation 2872.66**
Vertical PT:	**Station 152+00.00 – Elevation 2882.99**
Vertical Curve Length (Feet):	**800.00 (Sag Vertical Curve)**

Grade:	**3.49% (Station 152+00.00 – Station 160+50.00)**
Length of Grade (Feet):	**850.00**

Vertical PC:	**Station 160+50.00 – Elevation 2912.66**
Vertical PT:	**Station 185+50.00 – Elevation 2930.19**
Vertical Curve Length (Feet):	**2500.00 (Crest Vertical Curve)**

Grade:	**-2.09% (Station 185+50.00 – Station 192+50.00)**
Length of Grade (Feet):	**700.00**

ALIGNMENT ALTERNATE E-2
VERTICAL ALIGNMENT
THORNCREEK TO MOSCOW

Vertical PC:	**Station 192+50.00 – Elevation 2915.58**
Vertical PT:	**Station 212+50.00 – Elevation 2927.17**
Vertical Curve Length (Feet):	**2000.00 (Sag Vertical Curve)**

Grade:	**3.25% (Station 212+50.00 – Station 220+00.00)**
Length of Grade (Feet):	**750.00**

Vertical PC:	**Station 220+00.00 – Elevation 2951.53**
Vertical PT:	**Station 260+00.00 – Elevation 2929.74**
Vertical Curve Length (Feet):	**4000.00 (Crest Vertical Curve)**

PEAK ELEVATION FOR E-2 – APPROX. STATION 237+20 – ELEVATION 2979.34.

Grade:	**-4.34% (Station 260+00.00 – Station 340+00.00)**
Length of Grade (Feet):	**8000.00**

East / West Power Line – Approx. Station 261+50.

Vertical PC:	**Station 340+00.00 – Elevation 2582.78**
Vertical PT:	**Station 350+00.00 – Elevation 2557.60**
Vertical Curve Length (Feet):	**1000.00 (Sag Vertical Curve)**

Tie into Existing US-95 (Near Grain Elevators) – Approx. Station 347+00.

Grade:	**-0.70% (Station 350+00.00 – Station 352+99.57)**
Length of Grade (Feet):	**299.57**
END ALIGNMENT E-2:	**Station: 352+99.57 – Elevation 2555.50**

ALIGNMENT ALTERNATE E-2
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

BEGIN ALIGNMENT E-2	**Station: 43+71.58**
Bearing Direction:	**N 18° 53' 53" W**
Length (Feet):	**163.02 (Station 43+71.58 – Station 45+34.60)**

PC:	**Station 45+34.60**
PT:	**Station 50+76.68**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Feet):	**1° 15' 33"**
Curve Length (Feet):	**542.08**

Bearing Direction:	**N 12° 04' 19" W**
Length (Feet):	**2307.60 (Station 50+76.68 – Station 73+84.27)**

PC:	**Station 73+84.27**
PT:	**Station 80+99.50**
Curve Radius (Feet):	**2910.00**
Degree of Curve (Feet):	**1° 58' 08"**
Curve Length (Feet):	**715.22**

Bearing Direction:	**N 2° 00' 37" E**
Length (Feet):	**2031.16 (Station 80+99.50 – Station 101+30.66)**

PC:	**Station 101+30.66**
PT:	**Station 121+65.81**
Curve Radius (Feet):	**5580.00**
Degree of Curve (Feet):	**1° 01' 37"**
Curve Length (Feet):	**2035.15**

Reisenauer Hill and leave Existing US-95– Approx. Station 108+00.

Bearing Direction:	**N 22° 54' 27" E**
Length (Feet):	**636.48 (Station 121+65.81 – Station 128+02.29)**

PC:	**Station 128+02.29**
PT:	**Station 142+81.31**
Curve Radius (Feet):	**5580.00**
Degree of Curve (Feet):	**1° 01' 37"**
Curve Length (Feet):	**1479.02**

Structure over Eid Road – Approx. Station 142+00.

Bearing Direction:	**N 7° 43' 15" E**
Length (Feet):	**9913.03 (Station 142+81.31 – Station 241+94.34)**

ALIGNMENT ALTERNATE E-2
HORIZONTAL ALIGNMENT
THORNCREEK TO MOSCOW

PC:	**Station 241+94.34**
PT:	**Station 257+09.49**
Curve Radius (Feet):	**4550.00**
Degree of Curve (Feet):	**1° 15' 33"**
Curve Length (Feet):	**1515.15**

Bearing Direction:	**N 11° 21' 31" W**
Length (Feet):	**2989.28 (Station 257+09.49 – Station 286+98.77)**
East / West Power Line – Approx. Station 261+50.	

PC:	**Station 286+98.77**
PT:	**Station 300+75.36**
Curve Radius (Feet):	**5580.00**
Degree of Curve (Feet):	**1° 01' 37"**
Curve Length (Feet):	**1376.60**

Bearing Direction:	**N 25° 29' 37" W**
Length (Feet):	**3698.50 (Station 300+75.36 – Station 337+73.86)**

PC:	**Station 337+73.86**
PT:	**Station 348+69.75**
Curve Radius (Feet):	**1760.00**
Degree of Curve (Feet):	**3° 15' 20"**
Curve Length (Feet):	**1095.89**
Tie into Existing US-95 (Near Grain Elevators) – Approx. Station 347+00.	

Bearing Direction:	**N 10° 10' 57" E**
Length (Feet):	**429.82 (Station 348+69.75– Station 352+99.57)**
END ALIGNMENT E-2:	**STATION 352+99.57**