M 1

Dear ITD,

Please consider alternatives suggested by the Palouse Prairie Foundation and Paradise Ridge Stakeholders group, because Palouse Prairie is a unique ecosystem that must be preserved. There is less than 1% of the original prairie remaining on the Palouse, and that which remains is threatened by invasive exotic weeds and human disturbances. The recent re-discovery of the Palouse Giant Earthworm in a prairie remnant leads one to believe that these remnants may hold the key to the survival of unique endemic species that we don't even know about yet! I am writing this letter to protect Palouse Prairie and to encourage you to widen the existing highway, or design an alternative that makes no impact on remnant Palouse Prairie. I speak for the lily-white, up-to-three-foot long earthworm that was thought to be possibly extinct up until this past May -- Now, there is hope for its continued survival, and a highway alignment should not threaten that. Thank you very much for your time and consideration.

Good Luck!

M 2

Dear Mr. Helm,
I am a resident of Latah County. I support the route alternative C2 for route 95 from Thorncreek to Moscow. My alternative preferences would be for the other C alternatives, followed by W alternatives. I do not support any of the E alternatives.
Thank you.

M 3

A suggestion has been made that W4 to the intersection of W2, then on
W2 to end is a good idea. Take a look as it makes some sense to me.
Less costly than W2, and a good compromise.

Thanks

M 4

I have reviewed the proposed changes to Highway 95 a number of times. I am definitely in favor of the eastern most route-- the one that goes over a portion of Paradise Ridge, E2. I travel to Lewiston and points south very frequently and have many times wondered why the original route for 95 didn't bear more easterly and cross over Paradise Ridge after passing the town of Genesee. I am a PhD scientist by training and also a closet ecologist. After examining the documents and data presented by the ITD, I just don't buy the
arguments that the E2 route would have the significant impacts as claimed by its opponents. It is apparent to me that there is significant development already in most of the route. There are many homes, stables, and farmed land in the route-- obviously they people who live there now or farm there now did not have to go through the procedure that the IDT did to get approval to " ruin a very rare ecological region." I think it is more a matter of those folks wanting to preserve their privacy. I don't think it is right or

democratic for a few people to be able to inconvenience the majority of the population. Unfortunately, I fear that the vocal minority may "win" simply by waving the "Earth Day" flag around again. Don't get me wrong, I contribute to a number of organizations that are proactive about REAL issues-- such as the Nature Conservancy. If the E2 route is such a tragedy, then why hasn't the Sierra Club or Nature Conservancy been actively involved.

In any event, becsuse of its obvious convenience and low impact, I definitely favor the E2 route even though it is not a popular stance in Moscow.

M 5

Hi Rosemary!
We wanted you to have a copy of the comment sheet we have submitted to Ken Helm. We have sincerely appreciated your participation in this process.
Respectfully,

To: Idaho Transportation Department
Attn: Ken Helm
Lewiston, ID 83507
cc: Rosemary Curtin

Comment on U.S. 95 Thorncreek Road to Moscow

The Eastern alignments are the *least appropriate*.

1. **Adverse *visual* impact** (adverse domination of the viewshed)
   The higher the ground the greater the area over which traffic will be visible.

2. **Adverse *traffic noise* impact over a *greater area***
   The higher the ground the greater the area over which traffic noise will be heard.

   (I dispute the implication in the Evaluation Matrix that traffic noise is relevant only to 300 feet from the source. Traffic noise is generally unwelcome and can often be heard over an area with a radius of many times that distance.)

3. **Adverse *environmental* impact**
   - ❖ crossing of identified deer, elk and moose habitat
   - ❖ negative impact on habitat of vulnerable/imperiled species
   - ❖ could destroy rare remnants of native vegetation including Palouse Prairie
   - ❖ promoting the spread of invasive species into native, endangered ecosystems (why wasn't this addressed in the Evaluation Matrix?)

We urge that all Eastern alignments be eliminated from consideration.

We own and operate a tree farm. We are ten-year residents of Latah County.
Thank you very much for welcoming public input.

(hard copy mailed 1/31/06)

M 6

We Believe the I.T.D. had the right plan a few years ago when you wanted the road to go over Paradise ridge, which is now E2. I think it is the least disruptive and least expensive for all concerned. The elevation over that route is very minimal in comparison to Reisenauer hill or the hill by Sherm Clydes or our house. It is going through much less productive farm land.

All in all I hope you keep your plans that were the original and go with E2.

M 7

To:Idaho Transportation Department
Ken Helm
Lewiston, ID 83501
cc: Rosemary Curtin

Subject: U.S. 95 Thorncreek Road to Moscow, Public Comment

References:
Idaho Researcher Finds Rare Giant Palouse Earthworm
http://www.newswise.com/articles/view/517681/#imagetop

IUCN RedList
http://www.redlist.org/search/search.php?freetext=Driloleirus+americanus&modifier=phrase&criteria=wholedb&taxa_species=1&redlistCategory%5B%5D=allex&redlistAssessyear%5B%5D=all&country%5B%5D=all&aquatic%5B%5D=all&regions%5B%5D=all&habitats%5B%5D=all&threats%5B%5D=all&Submit.x=97&Submit.y=13

We submit the following addendum to our previous comments.

On the afternoon of January 31, 2006 the University of Idaho released a report (please see reference) that a recently collected specimen had been confirmed as a rare Giant Palouse Earthworm (Driloleirus americanus), native to Palouse Prairie and found in Palouse Prairie remnants.

The Giant Palouse Earthworm is both very rare (see references) and very remarkable, growing to some three feet in length and one inch in diameter.

The Giant Palouse Earthworm is on the IUCN Red List, an international list of critically endangered species. The process of enrolling the Giant Palouse Earthworm on the US Fish and Wildlife Service Threatened and Endangered list is underway.

This recent finding is yet another reason why we ask that ITD's plans for U.S. 95 Thorncreek Road to Moscow be informed by the moral and soon presumably legal imperatives to avoid disturbing native Palouse Prairie remnants.

M 8

To the attention of Idaho Department of Transportation, We feel that federal and state funding designated for Highway 95 realignment from Moscow to Thorncreek Road could be better utilized through the following:

1. Keep the current nondivided Highway 95 alignment and provide passing and turning lanes. This is already a good, well maintained road, through prime agricultural land and lovely landscapes. Passing and turning lanes would remove the least amount of agriculture land from production.

2. Keep speed limits at 55 mph, and slower in areas of concern for safety, with plenty of signage and lighted speed monitors. A good example of enforced slower speeds through areas of concern is Highway 195 through Colfax, WA. The Reisenauer grade would be an example of an area of concern for safety and could be designated a 45 mph zone. The first sign at the edge of Moscow for south bound traffic could be, " If you obey the speed limits you are only 33.8 minutes from Lewiston. Increase your speed 10 mph, you save only 5 minutes."

3. Use the money saved from highway construction to hire more Highway Patrol to monitor and enforce safe driving. Building a new highway is not going to change the weather. The presence of Highway Patrol and diligent enforcement of traffic regulations does modify driving behavior. Instead of building a new highway, motorists can be encouraged to drive responsibly and traffic fines can be the maximum allowed for each offense, whether it is the first or the tenth offense.

We appreciate the opportunity to offer our thoughts on this project. We feel that good stewardship regarding our land and tax dollars is extremely important for us and for setting a precedence for future generations to use resources wisely.

M9

Attached are my comments on the progress to-date of the reports being prepared for the EIS for the HW95 Thorncreek Rd to Moscow Project. Thank you.

Comments and Concerns -- Draft Consultant Reports for the EIS Being Conducted for the Proposed Realignment of US Highway 95, Thorncreek Road to Moscow Project

General Comments

My general reactions to the conduct of the public meeting/public involvement sessions of Jan. 18-19, 2006, are that they were a major improvement over past Highway 95 public involvement meetings, especially in the breadth and detail of the information provided to the public. I commend ITD for the meeting and the professionalism with which it was organized and conducted.

That said, I do have major concerns with the substantive content of the reports, the completion and use of the Alignment Evaluation Matrix (AEM), and the selection process for choosing 3 alternatives and its results.

This document addresses the consultants' reports and their use in the Alignment Evaluation Matrix (AEM). I address the process for and results of eliminating some alternatives from further consideration in a separate document.

My general reactions to the consultant reports are that a number of them are incomplete, inconclusive, and in some cases biased, use faulty or no data, and represent selective "cherry-picking" of environmental factors to consider in the matrix. A number of the values and ratings in the AEM also are not consistent with the actual findings of direct, indirect and cumulative effects stated in the relevant reports.

Also, I am particularly concerned that ITD and its consultants have presented an inaccurate and invalid set of findings by ignoring the presence of a major population center – the city of Moscow, ID – on the north edge of ITD's defined study area; any valid depiction of the impacts of this project's alternative routes has to include the large population in this city that would be affected by this project.

Context-sensitive design of highways and the Environmental Impact Assessment process, as specified by the National Environmental Policy Act, require this full and complete consideration of all impacts and their extent; but the current project studies and analyses essentially treat the project area as if it were in "out in the middle of nowhere," rather than coming through a set of hills on the edge of a valley ("Paradise Valley") in which a major community lies, and potentially over one of the valley's key landmarks, Paradise Ridge.

In short, the consultants completing these reports need to: (1) present their reports in a similar, consistent format, especially in terms of having an executive summary at the beginning of each report that highlights its main findings; (2) equally important, ensure their summary is clear in documenting how the results in their reports are consistent with the ratings/values/levels specified in the Alignment Evaluation Matrix; many are not now, and would not be defensible; (3) take into account the context of the current study area and the adjacent community of the city of Moscow for their data collection and interpretation; and (4) document the practical, pragmatic implications of the various alternatives' impacts, especially in terms of the cumulative effects and consequences of the phenomena they are documenting. I provide detailed comments below indicating some of these deficiencies are not addressed.

You can choose to ignore my concerns about these reports, but should you have to defend them, I consider that you have been alerted here to their shortcomings, and in many cases, their inconclusiveness for selecting three alternative routes for further consideration and ultimately a preferred alternative for the EIS.

Key Concerns

Several examples are provided here of major problems in the studies conducted.

In the case of Ungulate Wildlife, the Alternative Evaluation Matrix (AEM) shows that there are no populations of ungulate wildlife affected by the eastern corridors, yet the wildlife consultant notes in

his report (pp. 16, 17, 20) that cumulative effects are not a factor on the western routes and that collective impacts diminish from the east to the west. However, at the Jan. 2006 public meeting he admitted that the size of this population in terms of number of animals is unknown; and likely impacts on specific numbers also are unknown. An unknown number of animals divided by an unknown number of animals can only provide an unknown proportion – thus, stating that the eastern routes (Alt. E) will have "no population effect" in the matrix has no basis in any reliable or valid data, and this AEM rating cannot be empirically supported by what is merely conjecture.

Also, the AEM indicates that no sites of impacts of plants (under the criterion of "Conservation Data Center Plant Survey") that are on the eastern corridors would be affected. This is not consistent with the results reported in the Conservation Data Center Plant Survey report, which states on p. 15 that all the Alt. E routes intercept or adjoin areas of native plant communities, that these areas are suitable habitat for silene species, and that highways are the main vector for weeds – the key threat to these habitats.

An index that reflects distance of alternative routes from different kinds of sites, the relative value or importance of those sites, and the likelihood of, say, infestation from a highway, would provide a more valid and precise depiction of plant impacts. As it is now, for example, a route that intersects or adjoins a site of key importance (and thus would have a greater likelihood of affecting, say, Palouse Prairie) is not shown to have any greater impact than one that is several miles from a less important site. This binary approach to documenting impacts on plants (yes/no) is inadequate and provides biased results.

The noise analysis only accounts for built-structures close to the routes, and not for ambient noise that will be greater for, say Alt. E2 (with a grade for trucks to climb out of Moscow and to brake down into Moscow); clearly, this route would be louder and noisier for a great many homes located on the hills overlooking this route than for other alternative routes. Highway noise now can be heard from several miles away, and impacts of increased noise on the numerous residents of south Moscow need to be more accurately and validly represented.

Also, a value for road ice conditions should not be included in the AEM matrix until more complete, long-term, and valid data are collected; it is inaccurate to suggest that there are more road ice days (158 days) on the lower elevation routes to the west (Alt. W and C), as now depicted in the AEM, than those on the eastern Alt. E routes (128 days), where winter ice, snow, and fog are much more common and long-lasting. Further, the worst cases, and duration of these, in terms of undesirable weather conditions – not just averages – need to be provided, which would document that the E routes have more snow and ice; as is, the report shows these routes have 30 percent more precipitation than the W and C routes.

In addition, data used now are from an aberrant year – central Idaho has received more snow and ice, particularly at higher elevations like Paradise Ridge, in the last three weeks than was the case all last winter, which the current weather data represent.

Finally, the socio-economic evaluation criteria are incomplete in that they do not consider any impacts on a major population center just to the north of the project and contiguous with it -- the city of Moscow ID. As the FHWA's own Community Impact Assessment **H**andbook notes: "**The community impact study area typically includes communities within and immediately surrounding the project study area** (emphasis added.)"

Many specific criteria and categories of socio-economic impacts should be considered from a total community standpoint (including Moscow) that are currently being ignored. These kinds of impacts include: social and psychological aspects, including social values and quality of life, as well as visual and land use impacts in terms of aesthetics (the present visual analysis, according to the consultant, are weighted and thus biased to the relatively few persons living in the rural areas of the study area); other impacts such as compatibility with existing plans, use of public services and facilities (such as schools, recreation facilities, places of worship, and natural areas of special significance to the community) are not accounted for.

In particular, the Environmental Justice analysis and report are faulty in suggesting no "disproportionate impacts on minorities and lower-income populations." Data are not presented that clearly establish this conclusion. As this report's Table 14 shows, the Hidden Village/Benson Park area would be adversely affected by C and/or E alternatives in a number of ways, including safety, relocation, noise, and visual impacts. However, this is inconclusive for the purpose of this analysis: the key issue here is whether the total number of lower-income residents across the study area (including all other low-income residents) represents a disproportionate amount of total residents so affected in the study area. This fact is not available from this report, and without an accounting of low-income people per total population affected by each route, the Environmental Justice analysis as presented is inconclusive and invalid.

The following specific comments address more specifically problems with and shortcomings of the draft reports.

Specific Comments:

Weather Analysis report: The findings of the Weather Analysis should indicate that the timing and seasonality of differences in both moisture and temperature between higher elevation and lower elevation sites are critical. Variations in temperature in the context of season and elevation require specification, in that it is often significantly cooler in lower elevations during warmer seasons (e.g., low-lying frost pockets in the fall) that pose less danger for highway travel, and significantly colder conditions in higher elevations during the winter that pose much greater threats for safe highway travel. As noted above, the worst cases, and duration of these, in terms of undesirable weather conditions – not just averages – need to be provided, which would document that the E routes have more snow and ice. Significantly for highway safety, anyone living in Moscow, including Dr. Qualls, has looked up at Paradise Ridge and observed that it is clear or only raining in Moscow at the same time that it is snowing or icy on the Ridge (this phenomenon occurred just days before the ITD meeting – on Jan. 16 and 17, 2006 -- when the ridge was covered in a sheet of ice, and the next day snowfall, while other locations to the north and west were not).

An understanding of long-term trends for "typical" weather on the different routes needs to be accurately documented in this report, and incorporated in the Safety Analysis as well; as it is, this report does not adequately assess the indirect impacts of weather for highway maintenance, snow removal, policing, and the like. The Weather Analysis also is incomplete in the context of cumulative effects: this past year was an abnormally dry and hot year, and any analysis of weather needs to take a longer-term perspective, as the Weather Analysis report recognizes but does not accomplish. Major variations in conditions on a ridge route (Alt. E) would result in people driving too fast for conditions, resulting in higher accident rates and thus less safety.

As it is, this analysis is incomplete and invalid for choice of safe route alternatives. Further, the differences just noted above need to be accounted for in the Safety Analysis.

Safety Analysis report: The kinds of differences in moisture and temperature also need to be accounted for in the Safety Analysis, which currently is a simplistic approach that does not adequately consider the differences in weather patterns for varying characteristics of different route alternatives. This analysis is inadequate and provides unrealistic results. In particular, its failure to consider differences in weather-related safety and its arbitrary use of "numbers of turns" are not defensible.

This situation is not acceptable for a project whose primary goal, along with increasing traffic capacity, is to increase highway safety. Safe driving conditions will vary considerably depending on the route selected for realignment – and a comprehensive, valid analysis would show that Alt. E routes are significantly less safe than other alternatives.

As it is now, this analysis simply uses average accident per mile of roadway and estimates numbers of accidents based on route distance. It is not credible to assume a higher-elevation route characterized by a micro-climate of conditions of fog, snow and ice, and the accompanying impacts of high winds, will result in the same average number of accidents than a lower-elevation route not characterized by these conditions.

Specifically, the cumulative impacts of weather on Paradise Ridge, for example, will mean that Alternatives C3 and the E routes will have more variations in temperature and moisture leading to conditions of fog, snow and ice, and these alternatives will be less safe. This is common sense, yet the AEM ratings show the E routes to be safer in terms of projected number of accidents; this finding is neither credible nor valid.

Assessing cumulative effects also is needed in the Safety Analysis, particularly the consideration of the impacts of continued traffic on the existing Highway 95, if it becomes a county road, in addition to traffic on a new alternative such as an Alt. E route. Also, as noted above, this analysis needs to adequately assess the indirect and cumulative impacts of weather for highway safety, including its implications for road maintenance, snow removal, policing, and the like.

As noted above, the Weather Analysis also is incomplete in this context of cumulative effects: any analysis of weather needs to take a longer-term perspective and must be incorporated in the Safety analysis and report.

Wildlife report: The Wildlife report needs to be clearer about the direct and indirect effects of the different routes on white-tailed deer, elk, and moose. On p. 15, the report mixes its discussion of impacts and mitigation without being clear that the easternmost routes (E) without suitable wildlife crossings would be much less safe than other alternative routes. This is the ultimate conclusion and recommendation, but needs to be clear at the appropriate place in the report.

The Alternative Evaluation Matrix (AEM), in contrast, shows that there are no populations of ungulate wildlife affected by the eastern corridors. Yet the wildlife consultant admits that the size of this population in terms of number of animals is unknown; and likely impacts on specific numbers also is unknown. An unknown number of animals divided by an unknown number of animals can only provide an unknown proportion – thus, stating that the eastern routes (Alt. E) will have "no population effect" in the matrix has no basis in any reliable or valid data, and this AEM rating cannot be empirically supported by what is merely conjecture. As noted above, there is no basis for assessing impacts on ungulate populations for the Alt. E routes.

Visual Impact Analysis report: The Visual Impact Analysis and the report presenting its results are among the most professional of those provided for this project.

However, a major flaw in this analysis is that it needs to account for differences in the extent of development required for each alternative route and the extent of the impact. As it is now, the current analysis assumes that all of the alternatives have the same visual impact, and that each viewpoint represents the same number of people and duration involved in their viewing of an alternative route. These assumptions are not defensible: for example, Alt. E2, running over the shoulder of Paradise Ridge, would be seen by hundreds of households living in the hills of south Moscow, and this alternative would require a truck-escape ramp, major cuts (nearly 128 ft. at one point) and fills (83 ft. at one point, as high as the Wall of China), and a major bridge spanning Eid Road (approximately 4 stories high); the cumulative effects of these impacts means that this alternative would have much greater visual impacts than other alternative routes.

The claim that by ITD engineers that they cannot specify the design requirements for the routes (e.g., needed truck escape-ramps, etc.) is not credible. These engineers have had a year to apply standards to the routes and determine their specific requirements – if they can now specify heights of cuts and fills in great detail (see, for example, Figure 2 on p. 9 of the Environmental Justice report), they can specify where ramps, for example, are needed.

The Visual Analysis needs to be re-done, accounting for the true characteristics of the routes (e.g., escape-ramps, etc.) and their visual impacts.

Further, as it is now, this visual analysis is biased towards people living in the rural areas, where the viewpoints are more evenly distributed -- in effect, the views of these relatively few residents are weighted more by hundreds of orders of magnitude than those of the many residents of the ridges to the north overlooking the project area.

In sum, this analysis, while it represents a good start, is inadequate and has produced results that are biased against more visually intrusive routes, and biased towards rural residents -- when there are many hundreds of residents living on the ridges of south Moscow who also would be significantly impacted.

Noise report: A similar set of concerns applies to the analysis in the Noise report; it is not defensible to make a claim that there is no difference in the ambient noise generated by these different routes. This noise analysis is inadequate and has produced unrealistic results.

The current noise analysis only accounts for built-structures close to the routes and does not account for ambient noise that will be greater for, say Alt. E2 (with a grade for trucks to climb out of Moscow going south, and for those going north, to brake down into Moscow); clearly, this route that would be louder and noisier, especially given that a great many homes are located on the hills overlooking this route. Highway noise now can be heard from HW95 several miles away, and impacts on the numerous residents of south Moscow as well as elsewhere need to be more accurately and validly represented for all the alternative routes.

To conduct a defensible noise analysis, noise sensors should be positioned at varying distances away from the current highway and readings of sound volume taken; then these data should be averaged based on certain distances from the highway, and finally, applied to the number of structures (including houses on the ridges in south Moscow) within certain distances from the various alternative

routes, thereby providing a cumulative, weighted, and thus representative indicator of noise impact for each route.

This is the basic approach taken in the visual pact analysis (except here we're obviously dealing with noise, not views), and it is not defensible to apply it there and not here in the case of noise impacts – although again the weighting of impacts should be representative of all community residents, not just rural residents, as noted above.

Community Profile and Induced Development report: One related problem to the above points is that there is no comprehensive assessment of all community impacts of the alternative routes, specifically the impacts on residents of the city of Moscow. As has been pointed out to ITD several times, the Federal Highway Administration itself produced a handbook in 1996 for conducting this kind of assessment entitled, "Community Impact Assessment: A Quick Reference for Transportation," and legislation makes it clear that, as this handbook points out, impacts on communities adjacent to a project are to be assessed, just as Moscow is adjacent to the Highway 95 realignment project; as stated in Ch. 2 of the handbook:

"Study Area -- What is the scope of the geographic area to be examined?

Each technical analysis (i.e., air quality, traffic, and wetlands) may have its own individual study area. **Community impact analysts should identify a geographic region which incorporates the communities expected to be affected by the project based on scoping, public involvement, and interagency coordination.** This should include the project study area, and may extend beyond it. **The community impact study area typically includes communities within and immediately surrounding the project study area** (emphasis added.)"

ITD explicitly recognizes the centrality of the city of Moscow, Idaho, in this project: ITD has included this city as part of the community profile presented in this report, and has been holding its scoping sessions and public involvement meeting in this community*; but this report now* ***limits its assessment of current socio-economic conditions and characteristics of the study area to a focus primarily on "induced development."***

As the executive summary of the "Community Profile and Induced Development" report now states, "the overall objective of this section is to answer the question: How would the U.S. 95 Thorncreek to Moscow project affect the location, pattern, and pace of residential, commercial, industrial development in the area?"

ITD apparently chooses not to conduct a comprehensive assessment of other kinds of impacts to this community of the alternative routes, in violation of federal statutes and FHWA directives. The community profile report only selectively addresses the following kinds of impacts on Moscow residents, as also listed in the FHWA handbook:

What questions help identify community impacts?

Impact Category		
Social and Psychological Aspects	**Physical Aspects**	**Visual Environment**

Changes in Population Will the project cause redistribution of the populations or an influx or loss of population? **Community Cohesion and Interaction** How will the project affect interaction among persons and groups? How will it change social relationships and patterns? **Isolation** Will certain people be separated or set apart from others? **Social Values** Will the project cause a change in social values? **Quality of Life** What is the perceived impact on quality of life?	**Barrier Effect** Is a wall or barrier effect created (such as from noise walls or fencing)? **Sounds** Will noise or vibration increase? **Other Physical Intrusions** Will dust or odor increase? Will there be a shadowing effect on property?	**Aesthetics** Will the community's aesthetic character be changed? **Compatibility with Plans** Is the project compatible with community goals? Has aesthetics surfaced as a community concern?

Impact Category (Continued)		
Land Use	**Economic Conditions**	**Mobility and Access**
Land-Use Patterns Will there be loss of farmland? Does it open new areas for development? Will it induce changes in land use and density? What changes might be expect? **Compatibility with Plans** Is the project consistent with local land use plans and zoning?	**Business and Employment Impacts** Will the proposed action encourage businesses to move to the area, relocate to other locations within the area, close, or move outside the area? **Short-term Impacts** How is the local economy affected by construction activities? Are there both positive (jobs generated) and negative (detours and loss of access) impacts? **Business Visibility**	**Pedestrian and Bicycle Access** How does the project affect non-motorist access to businesses, public services, schools, and other facilities? Does the project impede or enhance access between residences and community facilities and businesses? Does it shift traffic? **Public Transportation** How does the project affect access to public transportation?

	Will the proposed action alter business visibility to traffic-based businesses? How will visibility and access changes alter business activity? **Tax Base** What is the effect on the tax base (from taxable property removed from base, changes in property values, changes in business activity)? **Property Values** What is the likely effect on property values caused by relocations or change in land use?	**Vehicular Access** How does the project affect short- and long-term vehicular access to businesses, public services, and other facilities? Does it affect parking availability?

Impact Category (Continued)		
Provision of Public Services	**Safety**	**Displacement**
Use of Public Facilities Will the proposed action lead to or help alleviate overcrowding of public facilities (i.e., schools and recreation facilities)? **Displacement of Public Facilities** Will the project result in relocation or displacement of public facilities or community centers (e.g., places of worship)?	**Pedestrian and Bicycle Safety** Will the proposed action increase or decrease the likelihood of accidents for non-motorists? **Crime** Will the proposed action increase or decrease crime? **Emergency Response** Will there be changes in emergency response time (fire, police, and emergency medical)?	**Effect on Neighborhoods** What are the effects on the neighborhood from which people move and into which people are related? **Residential Displacements** How many residences will be displaced? What type(s)-- multi-unit homes, single family, rural residential, others? Are there residents with special needs (disabled, minority, elderly residents)? **Business and Farm Displacement** How many businesses

		and farms will be displaced? What type(s)? Do they have unique characteristics, such as specialty products or a unique customer base? **Relocation Sites** Are there available sites to accommodate those displaced?

For example, just one item above, "Compatibility with Plans," is actually alluded to in the consultant's report, where elements of the city of Moscow's Comprehensive Plan are mentioned that have a direct relationship to the alternatives presented: for example, on page 25, under the Motor Vehicle Implementation Policies, the report states that "It is a priority of the city to develop a west U.S. Highway 95 bypass. It is important that a corridor for the bypass and be identified before land development occurs. The alternative to a western bypass the U.S. lacked Highway 95 and is in eastern bypass. However, several factors make the Western alignment and more logical choice." When a regional approach is taken to highway routing, it makes sense that a western alternative would be selected and developed to provide the beginning of this bypass. Unfortunately, ITD has refused to address this issue and take the common-sense approach.

In addition, the Community Profile report notes the goal in the Moscow Comprehensive Plan "to ensure a decent and safe housing in sufficient quantity to accommodate the various housing needs of present and future residents of Moscow;" one objective here is: "to maintain a proper environment for residential purposes in all residential zones, free from unnecessary noise, traffic, air pollution, and other nuisances." Furthermore, on the same page, the report notes that "Community Design includes the following goals, objectives, and policies that are relevant to the proposed project;" it then specifies the goal: "Create a pleasant and interesting environment within the city of Moscow that is attractive to its residents and visitors;" and an objective here is: "to develop attractive entrances to the city along major streets." In all of these cases, a context-sensitive design would call for an alternative route that minimizes the increased visual impacts and noise, and also reduced aesthetics and quality of life that would characterize some routes more than others.

In sum, this analysis is inadequate and needs to consider a full range of social and community impacts, such as those indicated above. Additionally, as the report notes (p. 34), an EIS must study the *"reasonably foreseeable effects"* of various alternatives, and *this is lacking here, and also as noted previously throughout all of these reports*.

Finally, the Environmental Justice analysis and report are faulty in providing no conclusive evidence about "disproportionate impacts on minorities and lower-income populations." Data are not presented that clearly establish this conclusion, and the report only notes in its conclusions that "the eastern alignments have a moderate adverse effect and mitigation would be needed". As this report's Table 14 shows, the Hidden Village/Benson Park area would be adversely affected by C and/or E alternatives in a number of ways, including safety, relocation, noise, and visual impacts. However, this is not

conclusive for the purpose of this analysis: the key issue here is whether the total number of lower-income residents across the study area (including *all* low-income residents) represents a disproportionate amount of *total* residents so affected in the study area. This fact is not available from this report, and *without an accounting of low-income people per total population affected by each route, the Environmental Justice analysis as presented is inconclusive and invalid*. Of particular concern, for example, are the Alt. E routes requiring relocation of 2 – 5 residences in Hidden Village/Benson Park area that presumably would be lower-income; similar relocations of lower-income residences on other routes need to be analyzed for relative proportionality and the results included in this report.

Conclusion

In closing, I would emphasize that stakeholders like the Paradise Ridge Defense Coalition expect that *ITD's consultants will correct and complete the above reports and provide full, adequate, conclusive and accurate assessments* of *all of the impacts of all of the alternatives* under consideration for this project -- as is anticipated in Federal law like the National Environmental Policy Act and in the rules, regulations, and protocols of key agencies, such as the Federal Highway Administration and the Environmental Protection Agency.

M 10

ITD Comments-Thorn Creek to Moscow

February 2, 2006

The following alignments are in my order of preference beginning with the best and ending with the worse.

C-3 I like this route the best. It seems to have the most positive characteristics and the least negative ones. It is one of the shortest, the cheapest, and the least conspicuous. It uses much of the existing highway, but shortens and improves it.

From an environmental stand point it is good, impacting the least prime farmland: having little effect on ungulates, Palouse prairie, and conservation species: and the least wet lands impact. It has the least flood plain hits, and the high number of tributary crossings is irrelevant since the existing highway already crosses them and the existing highway is going to remain. It will clean up 11 hazardous waste sites.

It impacts the least amount of archeological acreage and no historical sites and requires the least amount of right of way acreage.

It displaces only 3 residences, that is about average, and the 15 homes and 19 businesses that will be affected by noise are already being affected by the noise of the existing highway.

I think the climate for this route is good.

C-1 This route is very similar to C-3 except for a small section. It has many of the same attributes, but it is a little longer, and displaces more homes. However, these homes are all already located on the highway, so I assume the effect for them is not too big of a deal or they would not have chosen to live next to the

highway in the first place. I do question the mileage on this route. I don't understand how the existing highway can be 6.8 miles long and to straighten it and improve it will increase the length to 7.5 miles. It seems to me it should shorten it if you straighten it out some. Perhaps this was an error.

C-2 Again this route is very similar to C-3 and C-1 with many of the same attributes. I think this is a fine route too. . Perhaps it is better to go along the side of Clyde hill, but I would rather see the new highway stay in its present location rather than build a new location for it, although the new location for this option is rather short.

W-4 Again this route is very similar to C-3, C-1, and C-2 with many of the same attributes. I think this is a fine route too. I do not see the big advantage to going over the top of Clyde Hill. It seems to me it only increases the amount of land that needs to be purchased and moves the highway farther from its existing location.

W-2 If you feel that you absolutely have to relocate the entire highway and not use any of the existing highway for some absurd reason, then this seems like the best choice to me. I feel it has the least amount of negative attributes and the most positive ones.

W-3 I recommend elimination of this option. I think it is too long and too visible from all around the surrounding area. There are better choices available. I would prefer you to use more of the existing highway rather than build a new one.

W-1 I recommend elimination of this option. I think it is too long and too visible from all around the surrounding area. There are better choices available. I would prefer you to use more of the existing highway rather than build a new one.

E-1 I recommend elimination of this option. I think it has too much environmental impact and is too visible from all around the surrounding area. I also feel the weather is preferable in the lower, more sheltered locations. I would prefer you to use more of the existing highway rather than build a new one.

E-3 I recommend elimination of this option**.** I think it has too much environmental impact and is too visible from all around the surrounding area. . I also feel the weather is preferable in the lower, more sheltered locations. I would prefer you to use more of the existing highway rather than build a new one.

E-2 I recommend elimination of this option. I think it has too much environmental impact and is too visible from all around the surrounding area. . I also feel the weather is preferable in the lower, more sheltered locations. I would prefer you to use more of the existing highway rather than build a new one.

Additional Comments
I am wondering if you are saying that the new highway will increase property values. It seems to me that that may be true for businesses, but not for residential areas.

The parameters you chose for noise seem inadequate. Only 300' from the center line of the highway? It seems to me the noise impact will be much farther than that. Perhaps you meant 3000'?

The parameters you put on the plant and animal species studies seemed to me to be overly specific therefore eliminating the effects on non included species like the Palouse Giant Earthworm.

I feel your climate data is not very good and does not take the wind into account. Also, I noticed today that the existing highway is out of the snow, but all of the Eastern routes are in the snow. This is very normal. Last year was an unusual year as far as weather is concerned, and more data is needed to make a reasonable decision.

I would also like to see attention paid to the following items: future attachment to a Moscow Ring Road, inclusion of a safe bike path along the route so people can commute to town by bike, commuter lots so there is a safe place to park cars for carpooling, and planting of pine trees along the route to replace the beautiful trees removed along the Lewiston grade to Genesee section. I always enjoyed driving past those trees and it would be very nice to plant some more along the new route.

M 11
February 3, 2006

Idaho Transportation Department
Attn: Ken Helms
PO Box 837
Lewiston ID 83501

RE: U.S. 95 Thorncreek to Moscow Comments

I'd like to preface these comments by saying that choosing a top pick from each corridor as has been done by ITD arbitrarily frames the discussion that should be taking place. It is my contention that there may in fact be two or three alignments in a particular corridor that should be considered superior to all of the alignments of another corridor. Further the entire "East", "West" and "Central" construct is an artificial construct that should have no bearing on the discussion to pare down the options. I recognize that such a construct has benefits in trying to explain the process to the public. But when it comes to deciding on the most viable alignments, I would suggest that they be numbered one to ten and left at that.

That said, I believe that each of the alignments of the "Central Corridor" should be considered superior to all of the East and West Corridor alignments. This opinion is based on the following:

- True Economic Justice: Individuals that purchased property in the central corridor did so with full knowledge of their proximity to the main North/South artery in the state of Idaho. To locate the rerouted road in other areas would be patently unfair unless there was an overriding safety, financial or environment concern. No such concern exists in the Central Corridor.
- Visual Analysis: The East and West Corridors have a far higher aggregate visual impact than the Central Corridor.
- Cost: Alignments within the Central Corridor would cost less.

Within the Central Corridor I would agree with the ITD analysis that alignment C-3 is the superior choice for the following reasons:

- Cheapest
- Lowest Visual quotient
- Shortest Alignment
- Lowest number of displacements (tie with C-2)

Thank you for your consideration of these comments.

M 12

The attached document contains some comments from the open house on the US 95 Thorn Creek to Moscow US 95 project.

Comments on ITD environmental studies on US 95, Thorn Creek to Moscow.

None of the eastern alignments are acceptable from an ecological standpoint. They all destroy or threaten significant native habitat. Even habitat which escapes the direct effects of construction is threatened by increased activity and adverse effects of traffic. Putting a major highway through the eastern routes poses a direct danger to wildlife and to the vehicles and their occupants. Further, highways are proven conduits for new weed invasion, which destroys habitat.

The wisest alternative is to re-use as much of the existing corridor as possible rather than creating another corridor. That will reduce the environmental damage as well as preserve as much farmland as possible. Since the project is funded with federal tax dollars, your responsibility is not to a small group of landowners, but to the people of the entire US. You must eventually arrive at the best solution for all concerned. The eastern alignments are not part of that solution.

Most of the native habitat on the Palouse is so fragmented, isolated, and small that even indirect minor impacts can have huge ramifications in terms of reduced genetic viability of populations. Many of these populations are already pushed to the brink of extinction. Further reductions in population genetic base will lead to extinction. Alignment E3 in particular destroys parts of at least two remnants of native vegetation. Destroying part of the remnant is equivalent to destroying the entire remnant.

Mitigation cannot and will not replace habitat lost to road construction. It is extremely difficult and prohibitively expensive to include all the necessary ecosystem functions in a mitigation. The technology to do so in most cases simply does not exist. Further, the funding and commitment to continued upkeep of a mitigation site is frequently not available or sufficient to do a proper job. One cannot simply throw a few plants in the ground and walk away expecting an ecosystem to develop on its own. Nearly every mitigation implemented has been a total failure when viewed from an ecosystem approach. Most are dominated by invasive species.

Arbitrarily deciding to move forward with one route from each of the west, central and eastern alignments does not meet the spirit or the letter of the EIS process. The EIS process is in place to assure the least damage to the environment, not to throw obstacles in front of engineers who have already decided what they want to do. Failure to correctly follow the process will likely result in further litigation, more expense, and longer delays before the construction is completed. There is no reason more than one route cannot be selected from any one group of alignments to move forward in the process.

M 13

Please see attached PDF document. In case of problems with that, I am copying the text here.

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February 2, 2006

Comment on ITD environmental studies and alternative selections, US 95 Thorncreek Road to Moscow

The Eastern alignments would destroy or threaten more remnant native plant communities, require more mitigation effort for big game animals, produce higher cuts and deeper fills, and result in more total length of highway in the county than would the central alignments. In addition, the Eastern alignments cause the only disruptions to sensitive wildlife species.

All of the Eastern alignments harm Palouse Prairie ecosystems. They take out a Palouse Prairie remnant near Cameron Road and Conservation Data Center (CDC) Plant Survey sites at the southern end of the alignment. Palouse Prairie is one of the most endangered ecosystems in North America.

Just this week a positive identification was made of a giant Palouse earthworm (Driloleirus americanus) found in prairie habitat. This earthworm, which reportedly can grow to 3 feet long, is on the IUCN red list of critically endangered species, and has been found only in the Palouse. The previous sighting (around 1987) was in a forested area near Moscow. These discoveries provide added emphasis to protect the prairie grasslands and the forested pockets in the Eastern corridor.

According to the matrix, no CDC plant survey sites are impacted with alignment E2. However, the CDC sites—G3(2), H4(2) and H3(4)—near the southern end appear to be impacted by alignment E2 as much as they are by alignment E3. All three Eastern alignments would have a direct impact on important remnants of Palouse Prairie. Most of the remnants in the project area appear to be suitable habitat for Silene Spaldingii (G2/S1, threatened). All remnants contain populations of target species, and because all remnants (except the Paradise Ridge CS) are very small, any decrease in size or condition can be expected to further degrade the genetic base and threaten the long-term viability of the population. Direct effects to a remnant complex translate into the "taking" of the entire remnant because of their small size and an imminent threat from weeds. Further, direct effects to any remnant complex, other than Paradise Ridge CS, should be considered a taking of any species of concern supported by the remnant. Because the habitat is specific and extremely limited, the decrease in habitat size, combined with potential indirect effects of weed introduction, will likely result in loss of plant populations over the relatively short term. [Lichthardt: Biological Evaluation of Plant Species and Communities of Conservation Concern in the U.S. Highway 95—Thorncreek Road to Moscow—Project Area]

Lichthardt states that Alignment E3 intercepts two moderately valuable remnants. Based on plant biodiversity alone, alignment E3 would be the least desirable alternative. The biological assessment declares that there is 'no effect on threatened and endangered species.' Although there may not be a direct threat, the project will both directly and indirectly affect potential habitat for T&E species, and the effect will be greatest along the eastern alignments. This rare habitat should be protected for possible inclusion of species of concern.

Section III (Environmental Baseline) of the biological assessment does not mention the Palouse Prairie. It fails to establish the importance of the Palouse Prairie ecosystem in the project area.

All Eastern alignments are detrimental to the habitat of two species of concern, the pigmy nuthatch and the long-eared myotis bat. The Central and Western alignments are deemed OK. These species use the Ponderosas along the Eastern alignments. Therefore, it is recommended that ITD avoid construction that disrupts existing Ponderosa pine stands (that is, avoid E1, E2, and E3). [Melquist: Biological Evaluation on the Potential Impacts of Corridor Alternatives From Thorncreek Road to Moscow on Long-Eared Myotis and Pygmy Nuthatches]

The Eastern alignments are in bunchgrasses and ponderosa pines, which are valuable to wildlife. Western alignments would have no loss of wildlife habitat, but E2 and E3 would. Without mitigation, any Eastern alignment would have increased highway mortality. Collective impacts diminish as one goes from Paradise Ridge to the west; cumulative effects should not be a factor for Western or Central alignments. [Melquist: Biological Evaluation on the Potential Impacts of Corridor Alternatives >From Thorncreek Road to Moscow on Large Ungulates]

Wildlife crossing structures and warning signs are recommended for all three corridors, but the eastern alternatives (E1, E2, E3) would require the most wildlife mitigation expenditures, including purchase of "security habitat" to guide animals to crossing routes, fencing, wildlife exit ramps to allow trapped animals to escape the roadway, and addition of other ground to mitigate habitat loss.

Each potential US 95 alignment should be analyzed on its own merits without prejudgment based on its corridor. An Environmental Impact Statement is supposed to present a broad range of alternatives. The alternatives ITD is proposing to move forward are being limited based on geographical location.

In addition, a broad range of road designs should be presented in the EIS. All of the action alternatives are four-lane divided highways. ITD should present options for a non-divided highway with passing and turn lanes.

Whatever its location, it is prudent to reduce the highway's 'footprint' as much as possible to reduce its environmental impact. Such a design would be more compliant with the Federal Highway Administration's 'context sensitive design' guidelines. Placing the highway in the central corridor would best comply with the Environmental Protection Agency's guideline to maximize use of existing infrastructure by reusing the corridor rather than turning more farmland or prairie grassland into another transportation corridor.

The Palouse Prairie Foundation recommends that NO EASTERN ROUTES BE MOVED FORWARD.

M14

I forgot to send these in...

Eastern Corridor

NO EASTERN ALTERNATIVES SHOULD BE MOVED FORWARD.

Selecting one route from Western corridor, one from Central corridor, and one from Easter corridor to move forward is arbitrary. By the environmental matrix, it may be that two or more alignments rate better than any of the alignments in another corridor. Each alignment should be analyzed on its own merits without prejudgment by its neighborliness.

The Eastern alternatives would all have truck escape routes.
The eastern alignments damage the natural environment – they take out Palouse prairie near Cameron Road and near the southern end, and directly impact habitat of several species of concern (pigmy nuthatch, *myotis*).
The eastern alternatives would require major wildlife mitigation – fencing, one-way outs.
The eastern alternatives take out more houses than do W or C alternativess
Weather: increased snows, winds, fog
Paradise Ridge is a wildlife area.
Costs of wildlife mitigation should be considered. They will be substantial for the eastern routes.

E3

'Safety' – study flawed.
Average Daily Traffic used in ITD analysis is 6150 all alternatives. Each alternative should be split into pieces of the following three types: 1) Overlap (new alignment on top of old US95 alignment), 2) New alignment not on top of existing US95, and 3) remaining existing US95. Average Daily Traffic can be used for the 'Overlap' miles, but a smaller figure should be used for the new alignment, as the traffic would be split between
remaining US95 and the new alignment. In addition, the traffic on the remaining existing US95 must be acknowledged. (EIS must study reasonably forseeable effects of an action (Induced Development, p. 34)).

Using 6150 for overlap areas, 5000 for new alignment, 2000 for remaining alignment, I get the following:

	ITD miles	ITD A/y	New align miles	A/y	Remaining miles	A/y	Overlap miles	A/y	Total A/y
W1	8.2	13.07	8.2	10.63	7.3	8.13	0	0.00	18.76
W2	7.3	11.64	7.3	9.46	7.3	8.13	0	0.00	17.59
W3	7.8	12.43	7.8	10.11	7.3	8.13	0	0.00	18.24
W4	7.5	12.63	7.5	10.27	7.3	8.13	0	0.00	18.40
C1	7.3	14.59	0	0.00	0	0.00	7.3	14.59	14.59
C2	7.4	12.29	2.4	3.24	3	3.34	5	8.30	14.89
C3	6.8	12.97	4	6.20	3	3.34	3.5	6.68	16.22
E1	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24
E2	6.7	10.68	5	6.48	5	5.57	2	3.19	15.24
E3	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24

Thus, the eastern alternatives have a middling accident rate (C1 and C2 are lower) when the other factors are taken into consideration.

The 'safety' study does not take into account weather- or animal- related accidents. These would be elevated along the eastern alternatives as compared to the central and western alternatives.

Right-Of-Way: Six other alternatives have a lower value.

Construction cost: Six other alternatives have a lower value. Wildlife mitigation costs will be large.

Historic Sites: no effect – equal to 5 other alternatives.

Wetland acres: Three alternatives have fewer
Wetland tributaries: Four alternatives have the same or fewer crossings, three have fewer LF.

Hazardous Materials: on par with western alternatives.

Environmental Justice: All eastern alignments have an EJ component (*E1, E2, E3 relocations of concern*; community safety adverse impact on Hidden Village. [p. 32]). None of the others do.

Relocations: 2 residences. W1, W2, and W3 have none.

Visual: Only W2 and W3 (and E1, by a hair) are worse, according to MH+H.

Prime Farmland: Only W1 and W2 are rated higher.

CDC Animal Species: No effect on western or central route. WILL affect species for eastern alternatives. 'E alternatives are detrimental; C and W alternatives OK.' ***This makes E3 unacceptable.***

CDC Plant Survey: 2 sites. These sites are very important. Any impact to them would be detrimental; their existence is necessary as a possible future location for *Silene spaldingii.*
Without sites such as these, as small as they may be, *Silene spaldingii* will not return. As you are aware, Palouse prairie is the most endangered ecosystem in North America (USGS).
Prairie ground to the East: protect habitat for possible inclusion of species of concern.
Most of the remnants appear to be suitable habitat for *silene* species (p. 8).
E3 is the least desirable (p. 13)
Primary threat is weeds (roads are a major vector for weeds).
All Es intercept or adjoin remnant native plant communities (p. 15).
This habitat must be saved.

Ungulate Report:
Your matrix shows 4.7 acres of suitable habitat area. Six other alternatives have none.
'*Central alignments would have least effect on ungulates.*
E: bunchgrasses and ponderosa pines are valuable to wildlife (p. 18).
Cumulative effects should not be a factor if W or C (p. 16, 17)
Collective impacts diminish from Paradise Ridge to the west (p. 20)
E2, E3: loss of habitat
Any E increased highway mortality without mitigation
W: no loss of habitat
C: no detrimental impact except for twinning (p. 22)
E alternatives require the most mitigation, including security habitat, fencing, and 1-way outlets for trapped animals.'

Climate: Paradise Ridge alternatives certainly are more snowy (Eastern alternatives all show highest precipitation in the study, even with a small dataset). Wind is an issue. Especially when blowing snow. Fog is an issue (again highest amount of fog). The climate study was unsatisfactory due to such a short period of data collection, and such an odd winter (no snow).

Eastern Corridor

NO EASTERN ALTERNATIVES SHOULD BE MOVED FORWARD.

Selecting one route from Western corridor, one from Central corridor, and one from Easter corridor to move forward is arbitrary. By the environmental matrix, it may be that two or more alignments rate better than any of the alignments in another corridor. Each alignment should be analyzed on its own merits without prejudgment by its neighborliness.

The Eastern alternatives would all have truck escape routes.
The eastern alignments damage the natural environment – they take out Palouse prairie near Cameron Road and near the southern end, and directly impact habitat of several species of concern (pigmy nuthatch, *myotis*).
The eastern alternatives would require major wildlife mitigation – fencing, one-way outs.
The eastern alternatives take out more houses than do W or C alternatives
Weather: increased snows, winds, fog
Paradise Ridge is a wildlife area.
Costs of wildlife mitigation should be considered. They will be substantial for the eastern routes.

E2

Safety – study flawed.
Average Daily Traffic used in ITD analysis is 6150 all alternatives. Each alternative should be split into pieces of the following three types: 1) Overlap (new alignment on top of old US95 alignment), 2) New alignment not on top of existing US95, and 3) remaining existing US95. Average Daily Traffic can be used for the 'Overlap' miles, but a smaller figure should be used for the new alignment, as the traffic would be split between remaining US95 and the new alignment. In addition, the traffic on the remaining existing US95 must be acknowledged. (EIS must study reasonably forseeable effects of an action (Induced Development, p. 34)).

Using 6150 for overlap areas, 5000 for new alignment, 2000 for remaining alignment, I get the following:

	ITD miles	ITD A/y	New align miles	New align A/y	Remaining miles	Remaining A/y	Overlap miles	Overlap A/y	Total A/y
W1	8.2	13.07	8.2	10.63	7.3	8.13	0	0.00	18.76
W2	7.3	11.64	7.3	9.46	7.3	8.13	0	0.00	17.59
W3	7.8	12.43	7.8	10.11	7.3	8.13	0	0.00	18.24
W4	7.5	12.63	7.5	10.27	7.3	8.13	0	0.00	18.40
C1	7.3	14.59	0	0.00	0	0.00	7.3	14.59	14.59
C2	7.4	12.29	2.4	3.24	3	3.34	5	8.30	14.89
C3	6.8	12.97	4	6.20	3	3.34	3.5	6.68	16.22
E1	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24
E2	6.7	10.68	5	6.48	5	5.57	2	3.19	15.24
E3	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24

Thus, the eastern alternatives have a middling accident rate (C1 and C2 are lower) when the other factors are taken into consideration.

The 'safety' study does not take into account weather- or animal- related accidents. These would be elevated along the eastern alternatives as compared to the central and western alternatives.

Right-Of-Way: C1 and C2 have a lower value.

Historic Sites: One of six with no effect.

Wetland acres: four alternatives have fewer sites
Wetland tributaries: Three alternatives have the same or fewer crossings, four have fewer LF.

Hazardous Materials: Eight alternatives have the same or fewer sites.

Environmental Justice: All eastern alignments have an EJ component (*E1, E2, E3 relocations of concern*; community safety adverse impact on Hidden Village. [p. 32]). None of the others do.

Relocations: All alternatives but C1 have an equal or lower number of displacements. W1, W2, and W3 have none.

Visual: Only W2 and W3 are worse, according to MH+H.

Prime Farmland: All central alternatives are lower, as is W4. *C1 has least farmland impact (173); W1 the most (204).* Eastern alternatives intermediate (190-196).

CDC Animal Species: No effect on western or central route. **WILL** affect species for eastern alternatives. 'E alternatives are detrimental; C and W alternatives OK.' **This makes E2 unacceptable.**

CDC Plant Survey: Your matrix says 0 sites, but this is not justifiable. The two or three sites toward the southern end (G3(2), H4(2) and H3(4) are impacted by alignment E2 just as much as by alignment E3. Reporting in the report is a fluke of the cut and fill boundaries which are not consistent on the map. In any case, very close construction and fill proximity will destroy it.
So: 1 site.
EPA personnel have stated that 'Alternative 10A' (E2) would have a *direct impact* on important Palouse prairie landscape.
These sites are very important. Any impact to them would be detrimental; their existence is necessary as a possible future location for *Silene spaldingii.* Without sites such as these, as small as they may be, *Silene spaldingii* will not return. As you are aware, Palouse prairie is the most endangered ecosystem in North America (USGS).
Prairie ground to the East: protect habitat for possible inclusion of species of concern.
Most of the remnants appear to be suitable habitat for silene species (p. 8).
E3 is the least desirable (p. 13)
Primary threat is weeds (roads are a major vector for weeds).
All Es intercept or adjoin remnant native plant communities (p. 15).
This habitat must be saved.

Ungulate Report:
Your matrix shows 3.3 acres of suitable habitat area. Six other alternatives have none.
'*Central alignments would have least effect on ungulates.*
E: bunchgrasses and ponderosa pines are valuable to wildlife (p. 18).
Cumulative effects should not be a factor if W or C (p. 16, 17)
Collective impacts diminish from Paradise Ridge to the west (p. 20)
E2, E3: loss of habitat
Any E increased highway mortality without mitigation
W: no loss of habitat
C: no detrimental impact except for twinning (p. 22)

Eastern Corridor

NO EASTERN ALTERNATIVES SHOULD BE MOVED FORWARD.

Selecting one route from Western corridor, one from Central corridor, and one from Easter corridor to move forward is arbitrary. By the environmental matrix, it may be that two or more alignments rate better than any of the alignments in another corridor. Each alignment should be analyzed on its own merits without prejudgment by its neighborliness.

The Eastern alternatives would all have truck escape routes.
The eastern alignments damage the natural environment – they take out Palouse prairie near Cameron Road and near the southern end, and directly impact habitat of several species of concern (pigmy nuthatch, *myotis*).
The eastern alternatives would require major wildlife mitigation – fencing, one-way outs.
The eastern alternatives take out more houses than do W or C alternativess
Weather: increased snows, winds, fog
Paradise Ridge is a wildlife area.
Costs of wildlife mitigation should be considered. They will be substantial for the eastern routes.

E1

Safety – study flawed.
Average Daily Traffic used in ITD analysis is 6150 all alternatives. Each alternative should be split into pieces of the following three types: 1) Overlap (new alignment on top of old US95 alignment), 2) New alignment not on top of existing US95, and 3) remaining existing US95. Average Daily Traffic can be used for the 'Overlap' miles, but a smaller figure should be used for the new alignment, as the traffic would be split between
remaining US95 and the new alignment. In addition, the traffic on the remaining existing US95 must be acknowledged. (EIS must study reasonably forseeable effects of an action (Induced Development, p. 34)).

Using 6150 for overlap areas, 5000 for new alignment, 2000 for remaining alignment, I get the following:

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W4	7.5	12.63	7.5	10.27	7.3	8.13	0	0.00	18.40
C1	7.3	14.59	0	0.00	0	0.00	7.3	14.59	14.59
C2	7.4	12.29	2.4	3.24	3	3.34	5	8.30	14.89
C3	6.8	12.97	4	6.20	3	3.34	3.5	6.68	16.22
E1	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24
E2	6.7	10.68	5	6.48	5	5.57	2	3.19	15.24
E3	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24

Thus, the eastern alternatives have a middling accident rate (C1 and C2 are lower) when the other factors are taken into consideration.

The 'safety' study does not take into account weather- or animal- related accidents. These would be elevated along the eastern alternatives as compared to the central and western alternatives.

Right-Of-Way: Six other alternatives have a lower value.

Construction cost: Six other alternatives have a lower value. Wildlife mitigation costs will be large.

Historic Sites: 1 structure; six have no effect.

Wetland acres: four alternatives have fewer
Wetland tributaries: Seven alternatives have the same or fewer crossings, five have fewer LF.

Hazardous Materials: on par with western alternatives.

Environmental Justice: All eastern alignments have an EJ component (*E1, E2, E3 relocations of concern*, community safety adverse impact on Hidden Village. [p. 32]). None of the others do.

Relocations: All alternatives but C1 have an equal or lower number of displacements. W1, W2, and W3 have none.

Visual: Only W2 and W3 are worse, according to MH+H.

Prime Farmland: All central alternatives are lower, as is W4. *C1 has least farmland impact (173); W1 the most (204).* Eastern alternatives intermediate (190-196).

CDC Animal Species: No effect on western or central route. WILL affect species for eastern alternatives. 'E alternatives are detrimental; C and W alternatives OK.' **This makes E1 unacceptable.**

CDC Plant Survey: 2 sites. These sites are very important. Any impact to them would be detrimental; their existence is necessary as a possible future location for *Silene spaldingii.* Without sites such as these, as small as they may be, *Silene spaldingii* will not return. As you are aware, Palouse prairie is the most endangered ecosystem in North America (USGS).
Prairie ground to the East: protect habitat for possible inclusion of species of concern.
Most of the remnants appear to be suitable habitat for silene species (p. 8).
E3 is the least desirable (p. 13)
Primary threat is weeds (roads are a major vector for weeds).
All Es intercept or adjoin remnant native plant communities (p. 15).
This habitat must be saved.

Ungulate Report:
'*Central alignments would have least effect on ungulates.*
E: bunchgrasses and ponderosa pines are valuable to wildlife (p. 18).
Cumulative effects should not be a factor if W or C (p. 16, 17)
Collective impacts diminish from Paradise Ridge to the west (p. 20)
E2, E3: loss of habitat
Any E increased highway mortality without mitigation
W: no loss of habitat
C: no detrimental impact except for twinning (p. 22)
E alternatives require the most mitigation, including security habitat, fencing, and 1-way outlets for trapped animals.'

Climate: Paradise Ridge alternatives certainly are more snowy (Eastern alternatives all show highest precipitation in the study, even with a small dataset). Wind is an issue. Especially when blowing snow. Fog is an issue (again highest amount of fog). The climate study was unsatisfactory due to such a short period of data collection, and such an odd winter (no snow).

Central Corridor

Selecting one route from Western corridor, one from Central corridor, and one from Easter corridor to move forward is arbitrary. By the environmental matrix, it may be that two or more alignments rate better than any of the alignments in another corridor. Each alignment should be analyzed on its own merits without prejudgment by its neighborliness.

We do not need, nor do we want, an over-engineered divided four-lane highway ending just a mile or so south of town. Especially at the edge of town, we need to have an attractive roadway that enhances Moscow rather than dominating it with a huge roadway.

It is not too late to include a non-divided design; engineering has not been done on all of the routes. Follow Montana's US93 near Flathead Lake as an example. Colorado also fits their highways into the landscape nicely. We can, too. A narrower roadway can fit in better, it's easier to avoid historic sites, wetlands, etc., less ROW acquisition, less effect on ungulates (and associated traffic accident figures), less cut/fill.

Ideally, ITD would make this entire section of Highway 95 a good 2-lane with passing and turn lanes as needed. This would fit in with EPA specification of maximum use of existing infrastructure – reusing the corridor rather than turning more farmland or prairie grasslands into another transportation corridor. Latah County already is near the top of Idaho counties in amount of roads. This would also fit into the Federal Highway Administration's guidelines to do context sensitive design. All of the alternatives that ITD is offering appear to have huge cuts and fills.

The EPA stipulates maximum use of the existing infrastructure. Alternative C1 (as a four-lane and especially as a good two-lane with passing lanes and turn lanes) would do this extremely well. The other alternatives leave parts of US95, which will lead to strip development, and leave it as dangerous as ever – ITD can't use its current lack of safety as justification to rebuild, and then say it's won't be dangerous when Latah County takes it over. It may not be quite as bad with reduced usage, but...

The Federal Highway Administration is touting context sensitive design. The huge cuts and fills shown in the fly-bys indicate that this is not happening for any of the alignments. It could happen with a good two-lane over the existing alignment (or, to some extent, over other alignments).

ITD has recommended C1 for elimination partly due to "Projected accident rates (14.59 accidents per year)." This analysis is invalid. If cumulative effects of all the routes is done (which splits each alignment into 'new alignment" and 'rework of old alignment,' and including the accident rate of the remaining portions of US95), which must be done under EIS guidelines, then C1 has the **lowest** total accident rate (by my calculations). This is because the entire length of the nominally dangerous US95 is replaced.

C1

'Safety' – study flawed.

Average Daily Traffic used in ITD analysis is 6150 all alternatives. Each alternative should be split into pieces of the following three types: 1) Overlap (new alignment on top of old US95 alignment), 2) New alignment not on top of existing US95, and 3) remaining existing US95. Average Daily Traffic can be used for the 'Overlap' miles, but a smaller figure should be used for the new alignment, as the traffic would be split between

remaining US95 and the new alignment. In addition, the traffic on the remaining existing US95 must be acknowledged. (EIS must study reasonably forseeable effects of an action (Induced Development, p. 34)).

Using 6150 for overlap areas, 5000 for new alignment, 2000 for remaining alignment, I get the following:

	ITD miles	ITD A/y	New align miles	New align A/y	Remaining miles	Remaining A/y	Overlap miles	Overlap A/y	Total A/y
W1	9.2	13.07	6.2	10.63	7.3	8.13	0	0.00	18.76
W2	7.3	11.64	7.3	9.46	7.3	8.13	0	0.00	17.59
W3	7.8	12.43	7.8	10.11	7.3	8.13	0	0.00	18.24
W4	7.5	12.63	7.5	10.27	7.3	8.13	0	0.00	18.40
C1	7.3	14.59	0	0.00	0	0.00	7.3	14.59	14.59
C2	7.4	12.29	2.4	3.24	3	3.34	5	8.30	14.89
C3	6.8	12.97	4	6.20	3	3.34	3.5	6.68	16.22
E1	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24
E2	6.7	10.68	5	6.48	5	5.57	2	3.19	15.24
E3	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24

Looked at this way, ***C1 has the lowest accident rate***. And that is your major justification for doing a re-build.

The 'safety' study does not take into account weather- or animal-related accidents. These would be elevated along the eastern alternatives as compared to the central and western alternatives.

Right-Of-Way: Almost the lowest!

Construction cost: C1 has the lowest construction cost. And it would not have the higher wildlife mitigation costs that the eastern alignments would have.

Historic Sites: Two historic sites – maybe could be avoided with a slimmer more lithe highway design?

Wetland acres: Fairly low. Could be reduced with a trim 2-lane?
Wetland tributaries: OK, kind of high for number, but not the worst for LF.

Hazardous Materials: Hey, we'd get these sites cleaned up!.

Environmental Justice: No effect noted. Eastern alternatives do have an effect.

Relocations: Pretty high, huh?

Visual: Lowest visual effect (except for C3, winning by a eye).

Prime Farmland: This one will take out the least prime farmland -- even less with a narrow tireprint.

CDC Animal Species: No effect on western or central route. WILL affect species for eastern alternatives. 'E alternatives are detrimental; C and W alternatives OK.'

CDC Plant Survey: 0 sites. Ten cheers!!!

Ungulate Report:

'*Central alignments would have least effect on ungulates.*
Cumulative effects should not be a factor if W or C (p. 16, 17)
E2, E3: loss of habitat
C: no detrimental impact except for twinning (p. 22)' (Another plug for non-twinning goes in here.)

Climate: Shouldn't be much different than what we contend with now.

M 15

Please see the attached PDF file for comments on the studies.

I am concerned that much of the information in the environmental studies is not represented in the Alternative Evaluation Matrix. And, some that is seems wrong.

Weather

- E1, E2, E3, C3 found to have 30% more precipitation than Ws, C1, C2 (p. 25). Therefore more snow on the Eastern alignments.
- E1, E2, E3, C3 have more fog than Ws, C1, C2 (p. 25, 26). Worst cases (and amount of time in bad conditions), not averages, are important
- What about the effect of wind on snow?
- Interview knowledgeable folks: road maintenance people, residents.
- Check damage reports (roofs blown off).
- What are this winter's snows showing?
- P. 3 and 6: "May 31;" p. 5: "May 1."

An understanding of long-term trends for "typical" weather on the different routes needs to be accurately documented. This report does not adequately assess the indirect impacts of weather for highway maintenance, snow removal, and the like.

As it is, this analysis is incomplete and invalid for choice of safe route alternatives.

There is insufficient data and analysis of typical conditions to allow values for road ice conditions to be included in the matrix.

Rare Plant Survey

- *Prairie ground to the East.*
- *Protect habitat for possible inclusion of species of concern.*
- Most of the remnants appear to be suitable habitat for silene species (p. 8).
- *E3 is the least desirable* (p. 13)
- Primary threat is weeds (roads are a major vector for weeds).
- Note on takings (p. 12).
- *All Es intercept or adjoin remnant native plant communities* (p. 15).

An index that reflects distance of alternative routes from different kinds of sites, and the relative value or importance of those sites, would be useful.

Ungulates

- Lots of talk of twinning (p. 14, 22, 25)
- Includes effects of remaining portions of U.S. 95
- Flashing lights warning of animals – more of a need on E routes.
- *C: least effect on ungulates.*
- *E: bunchgrasses and ponderosa pines are valuable to wildlife* (p. 18).
- Cumulative effects should not be a factor if W or C (p. 16, 17)
- *Collective impacts diminish from Paradise Ridge to the west* (p. 20)

- *E2, E3: loss of habitat*
- *Any E increased highway mortality without mitigation*
- W: no loss of habitat
- C: no detrimental impact except for twinning (p. 22)
- E routes require the most mitigation, including security habitat, fencing, and 1-way outlets for trapped animals.
- This is the only report that indicates that divided highway would be more detrimental than a smaller undivided highway (kudos to the author)

The matrix shows that there are no populations of ungulate wildlife affected by the eastern corridors, yet the wildlife consultant notes in his report (pp. 16, 17, 20) that cumulative effects are not a factor on the western routes and that collective impacts diminish from the east to the west. Stating that the eastern routes (Alt. E) will have "no population effect" in the matrix cannot be justified as populations are unknown. It should be noted in the matrix that effects are expected to be highest to the East.

Species of Concern (Bat/Nuthatch)

- E routes are detrimental; C and W routes OK.

The giant Palouse earthworm was not included in the 'species of concern' study, but it should be. Palouse Prairie grasslands and Palouse forests must be protected for these rare creatures.

There is potential to encounter the giant Palouse earthworm in the prairie remnants on Paradise Ridge. The giant Palouse earthworm is on the International Union for Conservation of Nature and Natural Resources (IUCN) red list of threatened species.

Farmland

- *C1 has least farmland impact (173); W1 the most (204).* E routes intermediate (190-196).
- C1: 94.1 ac converted (could reduce by making undivided highway)
- C3: 133 ac (lowest except for C1)
- W3: 281 ac (most)

Visual

Potential initial visual impacts

	W1	W2	W3	W4	**C1**	C2	C3	E1	**E2**	E3
moderate_high plus high:	3.79	4.61	4.09	2.33	**1.71**	3.20	1.53	3.59	**5.38**	3.30
high	1.03	2.05	1.78	0.59	0.33	1.62	0.56	1.79	1.72	1.51

Lowest: C1. Highest: E2

Alignment E2, running over the shoulder of Paradise Ridge, would be seen by hundreds of households living in the hills of south Moscow, and this alternative would require a truck-escape ramp, major cuts (nearly 128 ft. at one point) and fills (83 ft. at one point)

The "fly-overs" presented at the open house should have been flown from North to South so that the visual impacts of each alternative as seen from the most dense population area (the City of Moscow) would be shown.

Environmental Justice

- *"... the eastern alignments may have a moderate adverse effect and mitigation would be needed..." – implies none such for C or W alignments.* [Conclusions, p. 33]
- *E1, E2, E3 relocations of concern*; community safety adverse impact on Hidden Village. [p. 32]

Of particular concern are the Eastern alignments requiring relocation of 2 – 5 residences in the Hidden Village/Benson Park area that presumably would be lower-income; similar relocations of lower-income residences on other routes need to be analyzed for relative proportionality.

Induced Development

- Mentions western bypass (p. 6)
- Additional development on U.S. 95 will lead to increased use (p. 7)
- Growth will occur
- EIS: must study reasonably forseeable effects (p. 34)
- Imperitive to coordinate with 'Ring Road' [which may cross U.S. 95 just S of Palouse River Drive, the N terminus of this project].
- "It is important that a corridor for the bypass and be identified before land development occurs. ... several factors make the Western alignment and more logical choice."

Impacts such as compatibility with existing plans, use of public services and facilities (such as schools, recreation facilities, places of worship, and natural areas of special significance to the community) are not accounted for.

When a regional approach is taken to highway routing, it makes sense that a Western or Central alternative would be selected and developed

"Community Design includes the following goals, objectives, and policies that are relevant to the proposed project;" it then specifies the goal: "Create a pleasant and interesting environment within the city of Moscow that is attractive to its residents and visitors;" and an objective here is: "to develop attractive entrances to the city along major streets." In all of these cases, a context-sensitive design would call for an alignment that minimizes the increased visual impacts and noise, and reduces aesthetics and quality of life that would characterize some routes more than others.

Archaeology – Historical

What conclusions are reached?
The project area is in 1855 treaty lands. Were tribal authorities (Nez Perce, Palouse, Coeur d'Alene) contacted? Men would be chipping arrowheads a bit up Paradise Ridge above where the women would be processing camas.

"Part of the Red Wolf Trail crossed near [Stevens Spring] and along the range; later the settlers stopped at the spring to water their critters before crossing up over into Moscow." [D. Sarff, 6/27/2002, LatahEagle]. Red Wolf was a Nez Perce warrior involved in the 1877 campaign [13Q at www.fs.fed.us/npnht/faw/]

Scouting in 1870's Lapwai to the North looking for a fort site. Lt. Sherman, 1871. [Donna Hansen, 2005, "Frontier Duty: the Army in Northern Idaho, 1853-1876." p. 100ff.]

'Safety' (traffic accident estimates)

- Indicates that E1 and E3 have lowest accident rates, C1 the highest (besides no-action).

'Safety' involves much more than accident rates due to turning traffic. This or a parallel study must include effects of snow, ice, fog, solar glare, wildlife-vehicle hazards, and much more.

Even as far as it goes, this study is flawed.

Accident rates on remaining U.S. 95 segments are not accounted for. **An EIS must study all reasonably forseeable effects--including remaining use of U.S. 95.** The dangerous parts along 'old U.S. 95' would still be dangerous although traffic volume would be reduced (however, development is predicted to increase along the remaining segments).

A more complete analysis shows that W1 has the highest accident rate, and C1 the lowest.

I took the approach of modifying ITD's results by using their figures of 6150 average daily traffic only for the OVERLAPPING alignment portions; for parallel segments, the traffic would be split between the EXISTING road and the NEW alignment. I selected 2000 for daily traffic for the existing, and 5000 for daily traffic for the new alignment portions. Mileages for each segment were estimated.

Taking these issues into account, C1 has the lowest accident rate.

	W1	W2	W3	W4	C1	C2	C3	E1	E2	E3	eXist
Field t	14	14	14	17	10	18	10	11	13	13	
Res tum	3	3	3	9	25	8	12	5	5	5	
County	4	4	4	6	9	6	7	4	4	4	
Comm'l	5	5	5	5	14	4	15	5	5	5	
TTM	1331.4	1331.4	1331.4	1791.7	3451	1681.8	3021	1351.1	1351.3	1351.3	
AAR	0.71	0.71	0.71	0.75		0.74	0.85	0.71	0.71	0.71	
miles	8.2	7.3	7.8	7.5	7.3	7.4	6.8	6.6	6.7	6.6	6.8?
MVM	18.41	16.39	17.51	16.84	16.39	16.61	15.26	14.82	15.04	14.82	15.26
A/y	13.07	11.64	12.43	12.63	14.59	12.29	12.97	10.52	10.68	10.52	24.87
A/y *	**18.76**	17.59	18.24	18.40	**14.59**	14.89	16.22	15.24	15.24	15.24	24.87
	HIGHEST				LOWEST						

"Average Daily Traffic is 6150 all routes"

Should be 6150 for overlap areas, ~5000 for new alignment, ~2000 for remaining alignment

A/y * = new_mi/mi*5000/6150*A/y + o'lap_mi/mi*6150/6150*A/y + exist/7.3*2000/6150*25

Values in table below are estimates for use in calculating correction factors

	mi	A/y	new_mi	5000	exist_mi	2000	o-lap_mi	6150	Sum
W1	8.2	13.07	8.2	10.63	7.3	8.13	0	0.00	18.76
W2	7.3	11.64	7.3	9.46	7.3	8.13	0	0.00	17.59
W3	7.8	12.43	7.8	10.11	7.3	8.13	0	0.00	18.24

W4	7.5	12.63	7.5	10.27	7.3	8.13	0	0.00	18.40
C1	7.3	14.59	0	0.00	0	0.00	7.3	14.59	14.59
C2	7.4	12.29	2.4	3.24	3	3.34	5	8.30	14.89
C3	6.8	12.97	4	6.20	3	3.34	3.5	6.68	16.22
E1	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24
E2	6.7	10.68	5	6.48	5	5.57	2	3.19	15.24
E3	6.6	10.52	5	6.48	5	5.57	2	3.19	15.24

TTM is total turning movements
AAR is average accident rate
MVM is million vehicle miles
A/y is accident per year

This 'safety' study is unacceptable for a project whose primary goal, along with increasing traffic capacity, is to increase highway safety. Safe driving conditions will vary considerably depending on the route selected for realignment – and a comprehensive, valid analysis would show that Eastern alignments are significantly less safe than other alternatives.

Specifically, the cumulative impacts of weather on Paradise Ridge, for example, will mean that Alternatives C3 and the Eastern alignments will have more variations in temperature and moisture leading to conditions of fog, snow and ice, and these alternatives will be less safe. Yet the matrix shows the Eastern alignments would be safer in terms of projected number of accidents; this finding is neither credible nor valid under expected weather conditions.

Biological Assessment – who is the author?

The project is in the 1855 treaty area. Was any ethnobotany done?

Section III should discuss the Palouse prairie ecosystem – one of the most endangered ecosystems in North America [USGS].

If one damages the prairie habitat, one damages the potential home of Spaldings catchfly. The prairie habitat should be protected for itself and as a repository for T&E species.

The giant Palouse earthworm is not mentioned.

Cultural Resources

There is a native 1870's trail (Clearwater to Coeur d'Alene), but claim moderate to low probability of prehistoric sites. Were native peoples consulted?

M16

Dear Mr. Helm-

I am a (rural) Moscow resident and I'd like to comment on the proposed alternative routes for the thorncreek to Moscow segment of the Hwy 95 renovation. I haven't been able to make (this round) of the public forums or meetings, though I did attend a couple back when this project was first being discussed. However, I've read through the descriptions of the various proposed alternatives and thought about my preferences for a route, for what its worth.

The major factor I think is important is to avoid developing a whole new line of homes and businesses across rural southern Latah county. For this reason, I strongly prefer the routes nearer to the current corridor. Then, when I look at the issues that I believe will affect the cost of the project (numbers of homes and businesses to be relocated, bridges, millions of yards of dirt to be moved, etc.) it also seems to me that some of the more central routes are among the best options. Last, I believe that the environmental impacts of the eastern routes that go across the rangeland of Paradise Ridge are also real costs to us local residents that can be avoided. There is a lot more wheatland in Latah county than there is bunchgrass prairie...

For all these reasons, then, I favor the routes W4 and C3.

Of course, my opinion is not informed by any knowledge of highway engineering - I am assumng that all of the proposed routes are satisfactory from a standards and safety point of view.

Please let me know if there is some mechanism other than this e-mail address that I should use to make my voice heard among all the others on this issue.

Thanks!

M17

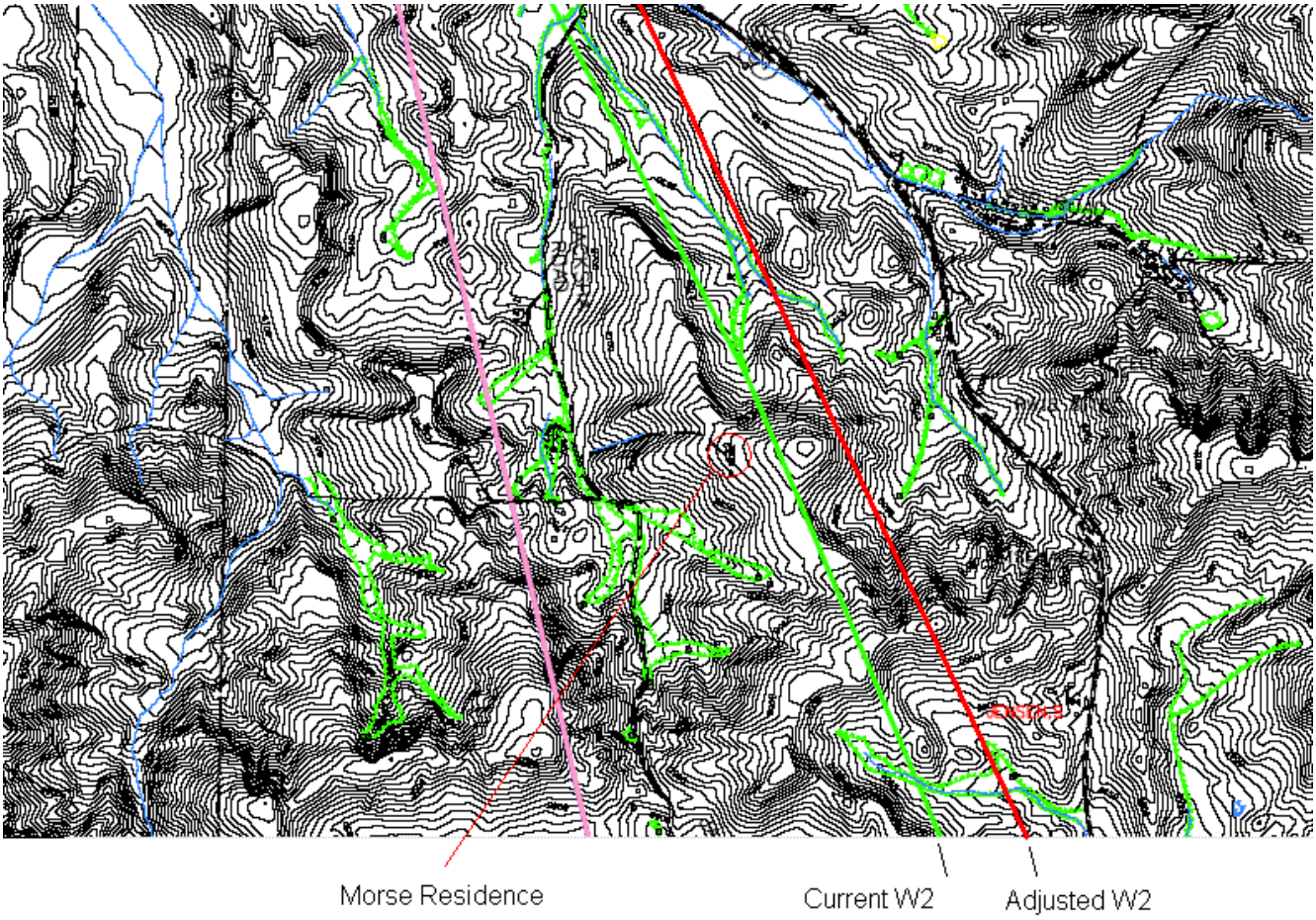
Ken,

I appreciate the time that you and your staff took to present the current status of the Thorncreek project and keep local residents up to date. Of the 3 selected routes, I believe the easterly route makes the most sense.

In talking to you and others, it appeared that the 3 proposed routes were tentatively final; however, it is possible that other routes may end up in the mix.

IF the w2 route were to be reinstated, I have a request that you adjust it so that its path is east of the knob that sits above our house. (The current proposed path for W2 is within 200 yards of our house—we already hear highway noise from the existing road and the proposed route for w2 would increase highway noise beyond what is acceptable.) I'm enclosing a snapshot of the ITD topo map along with annotations that identify the location of our house, the current route (in green) and my proposed adjustment (in red).

Thank you,



M18

Comments on Selection of 3 Alternative Routes for the EIS Being Conducted for the Proposed Realignment of US Highway 95, Thorncreek Road to Moscow Project

General Comments

As I previously noted in the document submitted on Jan. 29, 2006, my general reactions to the conduct of the public meeting/public involvement sessions of Jan. 18-19, 2006, are that they were a major improvement over past Highway 95 public involvement meetings, especially in the breadth and detail of the information provided to the public. I commend ITD for the meeting and the professionalism with which it was organized and conducted.

As also noted in my comments of Jan. 29, 2006, about the consultants' reports, a number of them are incomplete, inconclusive, and in some cases biased, use faulty or no data, and represent selective "cherry-picking" of environmental factors to consider in the matrix. A number of the values and ratings in the AEM also are not consistent with the actual findings of direct, indirect and cumulative effects stated in the relevant reports. Also, I am particularly concerned that ITD and its consultants

have presented an inaccurate and invalid set of findings by ignoring the presence of a major population center – the city of Moscow, ID – on the north edge of ITD's defined study area; any valid depiction of the impacts of this project's alternative routes has to include the large population in this city that would be affected by this project.

That said, I am commenting here about the use of the Alignment Evaluation Matrix (AEM), the selection process for choosing 3 alternatives, and its results.

Key Points

Comparisons among the alternatives cannot be made for criteria that current data and analyses are incomplete and inconclusive for, including wildlife, weather, noise, socio-economic (especially environmental justice), visual, and most importantly, safety. The AEM ratings for these criteria are faulty and misrepresent the reality of the likely impacts of the alternatives, especially for the 3 routes selected for final consideration.

Results of adequate, complete, and valid data collection and analyses would show that Alternative E2 would have the highest negative safety rating and that W4 would have the lowest – this would account for climate factors and ungulate wildlife collisions. The primary goal of this project, along with increasing traffic capacity, is to increase highway safety, and safety should be weighted the highest of all the criteria evaluated. E2 also would have the most negative ratings in terms of the following criteria: plant, ungulate wildlife, wildlife species of concern, visual, noise, and socio-economic, particularly environmental justice. Of particular significance, relocations and displacement due to E2 would affect a greater proportion of current lower income residents, resulting in environmental justice impacts greater than the other routes.

Alternative C3 is not that different from E2, except that its visual impact rating is lower, the noise levels would be high for a greater number of more immediate neighbors, and the number of hazardous material sites is greater – leading one to wonder if these sites would increase the cost of this route to more than the $33 million indicated.

Alternative W4 would have the least environmental impacts, lower visual impacts, and no wildlife or plant impacts. I am confident that a thorough, rigorous analysis would indicate it is the safest route.

My preference is to use as much of the existing roadway of the existing Highway 95, and thus ecological footprint, as possible – thus C3 or W4 are preferable to E2.

I believe that other impacts in terms of visual and noise could be reduced by a route that combines W4 south of Snow Rd. and W3 north of Snow Rd. – a route to the east of Clyde Hill that would be a shorter, straight shot into Moscow.

My personal preference would be a route that combines W4 south of Snow Rd. and roughly along W1 north of Snow Rd. until the point where it curves to the east – a route up along the state line to the west that, instead of creating more roadway south of Moscow, continues W1 north and west with a by-pass around the city.

Conclusion

In closing, I would emphasize that stakeholders like the Paradise Ridge Defense Coalition expect that the selection of alternatives and their evaluation will be based on complete and sound analyses for all relevant evaluation criteria, based on the primary purpose of the project, safety. ITD has to clearly, soundly, and rigorously identify the safest alternative having the least impacts -- as is anticipated in Federal law like the National Environmental Policy Act and in the rules, regulations, and protocols of key agencies, such as the Federal Highway Administration and the Environmental Protection Agency.

M 19

101 Year Flood, as observed from Davis/Deesten Place 05/09/2005

Looking Southeast, Highway 95 in background just behind trees.

Looking Northwest, main creek bed is off picture to the right

01 Year Flood, as observed from Davis/Deesten Place 05/09/2005

Looking East from Davis/Deesten Place

Looking East from Davis/Deesden Place. Flood now 1 foot below maximum. Truck in back on Highway 95

Looking Southwest from Highway 95.

M 20

ADDITIONAL "GENERAL" COMMENTS

1. The open house presentation was very well done. The A-V materials were generally good to excellent, the subject matter specialists were open, friendly, and knowledgeable. The people tasked with preparing and presenting this should get a hearty commendation.

2. The comparison MATRIX could have been improved by applying a dollar weighting to most intersections. For example, how do 5 "Hazardous Materials" sites (W4) compare to 11 such sites (C3). Unless these sites by some unimaginable conjunction of the stars are all of equal severity, the numbers haven't much meaning. You must have completed an estimated clean-up cost in order to arrive at the total construction cost. Inserting these costs into the matrix in addition to (or in lieu of) the raw counts would permit a more meaningful comparison.

I would mount a similar argument for most other cells; e.g., cost of wetland mitigation rather than totting up

"wetland acres" along the way. Ditto for "prime farmland impact rating."

3. I find it very hard to get any ~~[illegible]~~ substantive value from the "Visual Analysis" Row. This is so subjective to begin with that any numerical comparison has to be very shaky. Slicing the subjective ratings into 5 categories begins to look like "mathematical masturbation."

In addition, one must ask who is qualified or entitled to weigh in with an opinion here? Have you polled the five million drivers who will use this route over the next 20 years? Only the people who live along the route? The people who live in the immediate area?

I'd suggest throwing this one out or reducing it to something simpler like the AP College football rankings!

M 21

For us E-2 is the common sense route. Safety is our biggest concern. This is the safest route. It will have the least impact on our lives, best serve Idaho's future, is cost effective, and provides the best opportunities for environmental mitigation.

Safety Issues: Above all else, E-2 is safe, limited/no access, and doesn't require local residents, farmers and businesses to pull on and off the highway everyday. Idaho needs a road built to meet the next generation of highway travel. E-2 is also the shortest, straightest and flattest route available that doesn't split farmland. Less distance, curves, and grade changes mean fewer accidents. We believe ITD will design a highway that meets the most progressive standards and addresses the geographic, topographic and climatic problems that are found throughout our State.

Eastern Route (E-2) Safety Considerations:

Limited access highway:
Our 39 families will no longer have to pull on and off the Highway as much as a thousand times per year per family. No homes are adjacent, eliminating concerns with foot traffic, pets, and other residential activities impacting the right-of-way. There will be no county road accesses between Eid Road and Moscow. This will protect surrounding land from development and keep school bus, mail, farm machinery, local commerce, neighborhood traffic, commuters, and parents and teen-agers that live in the corridor and ferry young children to community and school events off this route. We feel that ITD's analysis has not fully accounted for the impact that eliminating the daily local traffic will have on accident rates.

Curves, grades, traffic characteristics, and constructability:
ITD's own accident analyses show this to be a safer route than any of the Central alternatives and much shorter and less disruptive than the Western alternatives. E-2 is the route that provides the best combined configuration of flatness, straightness, limited access and crossings that are major factors in potential accident rates. This route will be safer than the other routes during construction as it is the least disruptive to build, and will have the least construction impact and delays during construction. The route will have less severe cut and fill areas than other routes, minimizing drop-offs and hills adjacent to the roadway that contribute to the severity of accidents. Slow-moving farm equipment, school buses, mail delivery and local commercial traffic will use this route with much less frequency.

Climate, weather:
According to ITD's analysis, Route E-2 has a significantly lower frequency of icy road conditions than the Central and West routes. The worst conditions for fog were found to the south at Reisenauer Hill. All of the proposed routes are at a lower elevation than the top of Reisenauer Hill. On a larger scale, the relative conditions are less severe than current

sections of the highway from Reisenauer Hill to the Lewiston grade. Our experience as neighbors to this highway tells us that fast-moving traffic encountering icy conditions has resulted in more, and more severe, accidents than those associated with poor visibility and slower traffic. The lower Central routes with many curves, shady spots, patchy ice, hills, hidden driveways and county roads contribute to line-of-sight problems and sudden condition changes which have caused the bulk of critical and severe injury accidents. We feel that ITD's safety analyses have not given sufficient weight to the potential severity of accidents associated with these conditions, nor with the advantages of eliminating local access, moving local traffic off the route, and the changed character of the traffic achieved by eliminating farm machinery, school busses, etc. from the traffic flow.

Game/Wildlife:
There are issues of wildlife safety associated with all of the proposed routes as game migration occurs across the corridor. There are issues of the game's safety, as well as potential for accidents that endanger highway users. ITD's analysis shows that impacts to the game populations are potentially minimal and can be mitigated with both management and resource replacement actions. As landowners, we firmly believe that E-2, with mitigation, is the safest route for drivers with respect to game. It has the most efficient and effective locations to establish game crossings and manage attractive water and cover assets. As landowners, we support those efforts and will cooperate throughout the corridor to make them successful and improve conditions for game.

Other Routes' Safety Considerations:

Eastern Routes E-1 and E-3: We are not opposed to combining the best features of Route E-3 with E-2 to achieve a safer and less disruptive configuration in consideration of the other issues discussed below. We do not favor Route E-1 along the power lines as it has several disadvantages - is very steep, goes through Stevens Spring, and would probably be the most costly to construct.

Central Routes: We are adamantly opposed to all the Central Routes ***on safety issues alone***. We have risked our families' health and safety and witnessed too many deaths and severe injuries on this route in recent years. Each year it becomes more and more dangerous to access the existing highway as speeds and traffic volumes increase. We fear that there will be more tragic accidents associated with the five-plus year delay ITD is experiencing in resolving this problem today. We believe it would be total irresponsibility to retain a full access highway in the corridor as Moscow develops to the south and will only exacerbate an already dangerous situation. We believe ITD should fully reject the Central and any Western Routes that utilize the current right-of-way from the top of

Reisenauer Hill. Similarly, we believe ITD, on the basis of safety alone, should rescind the federal guideline to take maximum advantage of existing right-of-way in this case. Rather, ITD should work closely with the North Latah Highway District, City of Moscow and Latah County to move the Federal Highway to a no-access standard and develop the existing route to serve local traffic and development needs of the community. Aside from access issues, these routes have more line-of-sight-problems and are subject to more shade, slick road surface conditions, and pockets of fog. Additionally, wildlife crossings are more problematic and more difficult to mitigate. As one neighbor notes, "if you can't have pets; why worry about deer?" Farmers have no choice but to use this route whether it's a federal or local highway. The Central routes are not a next-generation highway; future highway expansion is not possible. These should be dropped from consideration.

Western Routes: We believe the Western routes are also less safe than the Eastern routes. They are needlessly longer, require cuts and fills that elevate the roadway above surrounding terrain, have more grade changes, are subject to more shade, ice, drifting conditions, and have more access points and problematic game crossings. We are especially opposed to Route W-4 for safety reasons similar to the three Central routes as these all include Reisenauer Hill, thereby retaining this treacherous stretch of so many accidents and local and county road accesses.

Agricultural / Farm Livelihood Issues: Route E-2 also best serves the agricultural needs of the corridor. It follows Latah County's comprehensive plan to preserve prime farm lands. E-2 is on marginal ground at the base of Paradise Ridge, not the prime farmland below. It does not split farms and doesn't require farmers to access it with planting and harvest equipment. We believe ITD's analyses on farm impacts to be weak. The Eastern routes are located on consistently poorer quality decomposed granite/clay soils that are better for constructability than the more fertile soils below. The land along E-2 is almost exclusively participating in the Conservation Reserve Program (CRP) or being slated for development. Yields, were it to be farmed, are substantially less than in the lower elevations. The value of the land, were it for sale for agricultural purposes, would be considerably less. These lands are in CRP because they are less productive and poorer quality. ITD should recognize this in their analysis of impacts to prime farmland.

There is also considerable concern regarding the splitting of farmland. A particular advantage to the E-2 route is that is does not divide farming units below the ridge. Land to the east can remain in CRP and minimize any harvest and planting impacts. Some of this land will be available for mitigation, if required. Among the Central routes, C-3 in particular would divide farms/land with better soils than eastern routes. ITD's analyses seemed to address farm fragmentation by examining property parcels rather than farming operations. As a result E-3, C-2, C-3 and all of the Western routes are disruptive of current and on-going farm units and operations. The owners of these properties who will be directly affected are members of our group and believe they should be consulted directly on these issues.

The farm owners and operators were astounded that ITD failed to take yield, productivity and soil quality factors (well known to the agricultural community) into account. ITD should recognize that taking land out of CRP, that receives government payments, is preferable to condemning some of the most productive wheat land in all of Idaho that contributes to our local and State economy. The "Snow Valley" west of the current highway is the most productive farmland of any of the routes, with highest yields/appraisal values. This century old farming operation will be severely impacted and fragmented by any of the Western routes.

Historic Properties / Buildings Issues: Several of our group's members were surprised that ITD's report saw such insignificant historical and architectural value in several 50-120 year-old properties and buildings in the corridor. These group members will likely ask that their property be re-evaluated by an independent appraiser should their property be impacted by the routes forwarded to the EIS process. The one property identified on route W-4 seems to make that route ill-advised as well. Route W-4 would consume the majority of pastureland associated with this property, is located in the flood plain, and would require re-channeling the creek. This particular area is of historic significance as it was reportedly a cash purchase in 1881 by William Plummer (Plummer, ID's namesake) and the existing original orchard was established the same year. Further research on the Davis property is needed, as apparently the narrowest interpretation of historical value seems to have been applied.

ITD has also ignored that two of the farms in this area were established, and are still maintained, by the same families prior to Mr. Plummer's purchase in 1881. Both the Clyde and Snow farming operations were original homesteads and pre-date the State, the Idaho Constitution, and ITD. These are recognized Centennial Farms that have been continuously owned and operated by the same families for 128 years. The Clyde family is supportive of Route E-2 that passes through their land and is willing to work with ITD to affect the best route as discussed above. The Snow families are also supportive of E-2 that passes through parts of their collective operations. They are adamantly opposed to all the Western routes that will destroy and fragment some of this century-old farm's most productive land.

Private Property Issues: E-2 is the least disruptive to most of those whose property could be taken by the new route. The attached map shows those landowners in the corridor who support E-2 as the preferred alternative (80% of affected lands, at this time). There will be the least opposition and acquisition problems from the property owners directly affected with Route E-2.

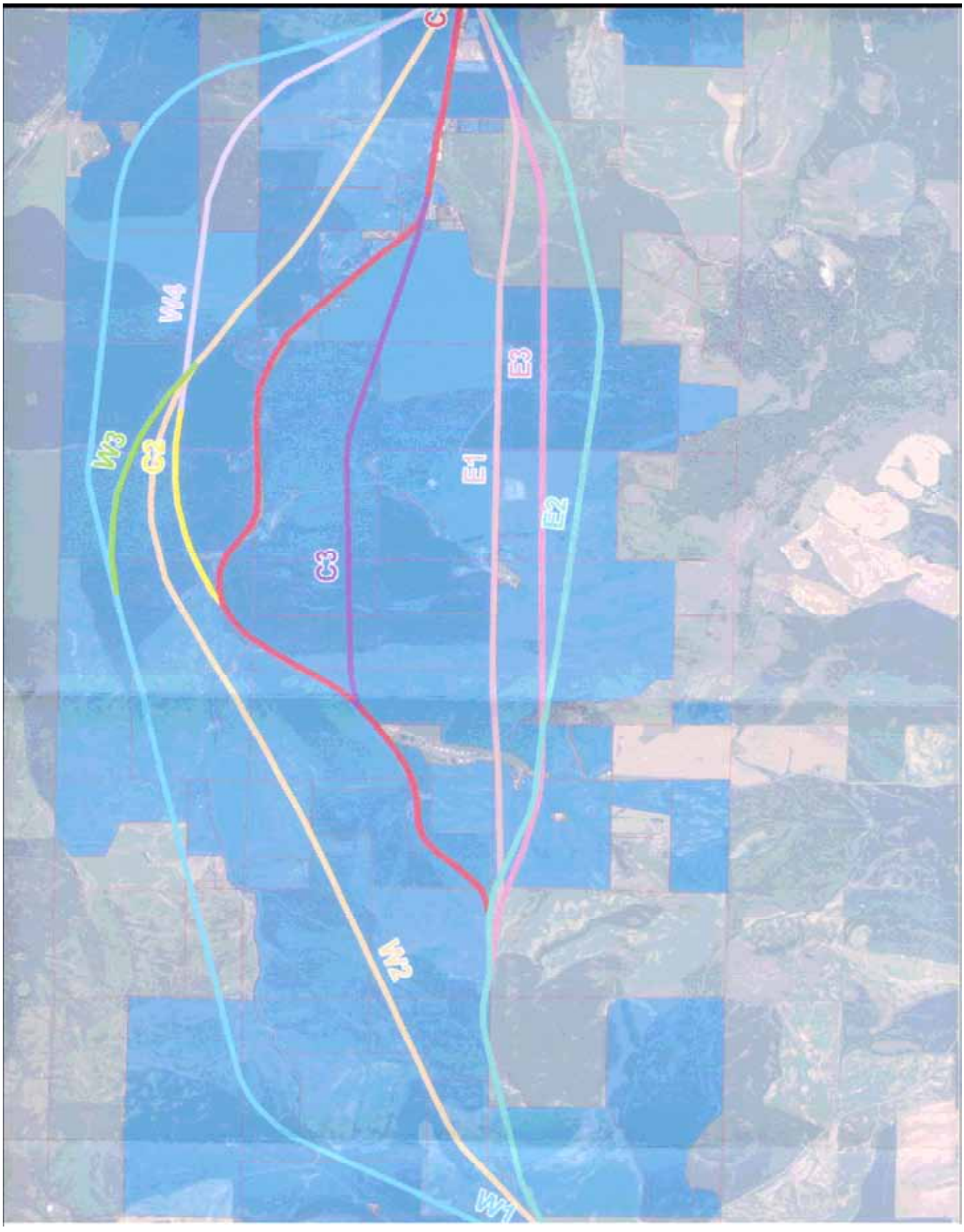
Convenience / Construction Disruption Issues: Route E-2 can be built without impacting the existing highway during construction, minimizing construction delays, inconvenience and accidents.

Environment Issues: E-2 is ¼ mile from the base of Paradise Ridge and we urge ITD to diligently investigate any potential adverse environmental impacts and appropriately mitigate those, as required. Special attention should be given to game crossings for wildlife, groundwater and wellhead protection in the Eid Road developments, mitigation of wetland and habitat damage, and minimizing impacts to adjacent properties. Our members are committed to work with all parties to implement environmental improvements throughout the corridor.

Aesthetics and Visual Impact Issues: We also encourage ITD to consider the aesthetic aspects of the highway. Paradise Ridge is beautiful to look at (as we've known for generations) and that should be respected in the design of the new route. We believe E-2 could be an attractive entrance to Moscow and provide an impressive viewpoint in itself. We believe that ITD's visual analysis presented at the workshop meetings was short-sighted and one-sided. We believe ITD should also consider the visual impact *from* Route E-2 as it approaches Moscow and overlooks the Palouse, consider scenic highway status, and provide a rest area to promote the Palouse country.

Cost: We also believe that E-2 will prove to be the most cost effective route, with the fewest miles, most suitable sub-grade materials, least cut-and-fill, and least right-of-way acquisition expense. **We believe the more savings there are in construction costs, the more funds will be available to mitigate any adverse effects and make this a better road for everyone.** We also urge the ITD to consider constructability of these routes. We believe there will be substantially greater difficulties and costs associated with working in the soils along the Central and Western routes than on E-2. These Central and Western Route soils are better suited to raising wheat than roadbeds, and will require substantial amendments to provide suitable sub-grade.

We, the undersigned residents and owners of property in the Thorn Creek to Moscow Corridor support Route E-2. We respectfully request that ITD include this alignment in the EIS, identify appropriate mitigation efforts, work with landowners to implement those measures, and build the safest highway possible along the E-2 route, as soon as practicable.


C1
W4
W3
C2
E3
E1
E2
C3
W2
W1

M 22

RECEIVED
FEB 03 2006
DIV. OF HIGHWAYS
LEWISTON, IDAHO

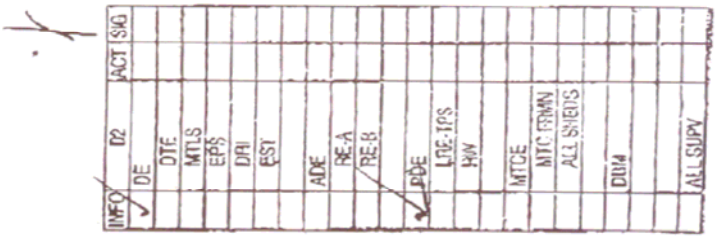
MR. Ken Helm:

I wish to Comment on the Thorncreek To Moscow highway project. I Am NOT in favor of the west corridor plan. My Major Concerns are: ① Safety - This West Plan will keep the Reisenauer Hill area which has been a Trouble Area over many years. Also the West Plan has more ice hours than the other Two Plans. ② Cost - The west plan is the longest and will Cost the State of Idaho / Tax Payers The most. Why Wouldn't we Take The Cheapest way and The Safest route - I favor The East Corridor.

I have Another Thought. The west Corridor is About 1 mile farther Than The East Route. SAY 1000 CARS Use The Road each day and get an Average of 20 miles per gallon. The east route would Save About 50 gallons of gas per day or over 18 Thousand gallons per year. Let The Point - Lets Save energy - use The East Corridor.

Sincerely Yours

M 23



January 23, 2006

Ken Helm, ITD Project Manager
State of Idaho
Transportation Department
District 2
PO Box 837
Lewiston, ID 83501-0837

Re: Project No. DHP-NH-4119(156); Key No. 9294, Thorncreek Road to Moscow

Dear Ken,

We are grateful for the funding that is available to improve our highways and for your expertise and that of all the consultants working on this important project. We thank you for the opportunity to comment on this project as it pertains to our situation.

If the alignment selected for this project passes between the Reisenauer/Davis residences, please consider the following:

At the beginning of this project when we began visiting with ITD representatives, the proposed design of the new highway was presented to us as five-lanes between the Reisenauer/Davis residences. The middle lane would become the turn lane for access to our properties. We were all in agreement with this proposal. This Phase I design was then approved by the appropriate state and federal agencies and subsequently stopped by a court decision.

This five-lane concept is in place at the top of the Lewiston Hill, on improved Highway 95 north to Coeur d'Alene, and the approach into Moscow (visual analysis of all alternatives). This design (top of Lewiston Hill and north to CDA) does not appear to be a safety issue. The transition to five lanes is visible however driving speed is not affected. We do not believe a five-lane design between these two residences would be a safety issue either. It is less than one-quarter mile on a straight stretch.

We have lived in this family home since 1959 making improvements looking toward retirement. We are now retired with an established life-style, and it is difficult at this stage of our lives to contemplate losing the use of our home. There is a viable alternative. If the five-lane plan is implemented, this will not be necessary. Our home will, of course, be nearer to the roadway, and we know there will be some impact but not as severe as the loss of enjoyment of our home and proximity of our family, the Davis'.

We believe this five-lane concept, as previously approved, is a win/win situation. The much needed improvement will be made to Highway 95, and we may continue to enjoy our lifestyle and home of 47 years.

TO RECAP

- OUR HOME OF 47 YEARS
- PHASE I FIVE-LANE CONCEPT PREVIOUSLY APPROVED BY STATE AND FEDERAL AGENCIES
- UNIQUE AND ONLY SITUATION - TWO RESIDENCES ON EACH SIDE OF ROADWAY
- FIVE-LANES CURRENTLY UTILIZED ON HWY 95 INCLUDING PROPOSED ENTRY IN TO THE CITY OF MOSCOW
- VIABLE SOLUTION AVAILABLE
- WIN/WIN SITUATION FOR ITD AND US

4520 Clearview Dr.
Boise, ID 83703
November 8, 2005

State of Idaho
Transportation Department, District 2
PO Box 837
Lewiston, ID 83501-0837

Re: Project No. DHP-NH-4119(156); Key No. 9294; Thorn Creek Road to Moscow

I've known Gerald & Judy Reisenauer since 1969 and lived across Highway 95 from them for a couple years during my and my husband's college years. Gerald served our country as a service man, Judy has served the State of Idaho with her administrative assistant jobs with a Registrar, a Dean and two Presidents at the University of Idaho. Plus they have served their Latah County as productive producers of farm products, which in turn serves the State of Idaho.

This highway alignment is serevely encroaching upon their property and their lives. I cannot understand why you cannot consider a divided highway with a 5th turn lane in the small ¼ mile or less between the properties of Gerald & Judy Reisenauer and Kevin and Karen Reisenauer Davis property across the highway. While driving Highway 95 south from Couer d' Alene this past week, I noticed that at Mica Creek, you have a divided highway with a 5th turn lane – no large center property. Then, at the top of Lewiston hill, you again have a divided highway with a 5th turn lane – no large center property. Why in all reasonableness can't you do the same for this small area for the Reisenauer family?

Gerald and Judy have retired and spent the last few years updating their home. They have spent thousands of dollars on the home and grounds. It is home beautiful as with "Homes and Gardens" publication. Many friends, neighbors, and strangers have remarked upon Gerald's care of the grounds around their home. He has mowed the highway right-of-way and his grounds by a walk-behind mower for years. It's a park-like yard and grounds. He flies the American Flag daily and mows and mows all summer. As I understand the highway district plan you wish to remove 65+ year old evergreen trees that are from 40-80 feet tall in front of the Reisenauer's home as a sound barrier now. What will your department do to replace this barrier?

They have their 5 bedroom farm home with an upstairs and full basement, separate 3+ car garage, large barn for shelter for farm animals + storage of hay and fodder for their animals, a large shop for the repair of farm equipment, and an equipment storage building storing such vehicles as combines and big tractors with accompanying farm equipment for production of crops on the Palouse Prairie. Then they have the chicken house, in great condition, although not in use now for chickens. This 6 acre complex is a farmer homebase. This place has been lovingly cared for and maintained. They split off the homesite from the large farm operation to expand their sale opportunities in the future. Sell the whole place, or sell the farmland separate from the homesite acreage. Seems like

a smart move to me, but you seem to be using this separation against them. As if it's only their home that is at risk of this road alignment. They are not in opposition to the alignment of the roadway, just that it looks to destroy their lives as they now know it. If they were younger, they've said that they may see it as an opportunity to meet the challenge, but they are retired and wish to be at peace. Again they have spent thousands of dollars on their home complex. Please reconsider your plans in light of the above testimony. Pretty please.

M 24

February 2, 2006

Ken Helm, ITD Project Manager
State of Idaho
Transportation Department
District 2
PO Box 837
Lewiston, ID 83501-0837

Re: Project No. DHP-NH-4119(156); Key No. 9294, Thorncreek Road to Moscow

Dear Ken:

Thank you for the opportunity to comment on this project and proposed routes to complete the highway between the top of the Lewiston hill and Moscow.

Our first preference would be to have the new road go behind our residence (W-1, W-2, W-3). By choosing this route, there will be minimal impact to those of us who have chosen to develop our homes and property, and who want to live in an area uncluttered by traffic and potential traffic related issues down the road.

Any other option for this project will severely impact our daily lives and that of our business (K & K Electric, Inc.). If the road were to go behind our residence, the road in front of our homes would become a "country" road for those of us who live along that stretch of the highway. Our lives would be uninterrupted, and our business could continue to thrive.

At the beginning of this process, the proposed design was presented to us as five lanes between our home and the home of Gerald and Judy Reisenauer. It was our understanding that the middle lane would be used for access to our properties. We were all in agreement with this proposal (Phase I); it was subsequently approved by the appropriate state and federal agencies. To our dismay, it was stopped by a court decision.

In our research for alternative solutions in the event the five lane road will in fact go through, we discovered several locations on Highway 95 North to Coeur d'Alene and the design at the top of the Lewiston hill where the transition to a five lane highway can be done safely and effectively without a median in the middle. This is a small deviation to the overall plan (less than a quarter mile) that will still help us maintain the quality of life we have become accustomed too.

In the event that a four-lane highway with a median is approved as the final solution, we would be very disappointed, and would be forced to uproot our thriving business, and move from the home where our children were born and raised. In addition, my parents have lived in their homestead for more than 45 years and it would be devastating for them to have to move at a time in their life where they are enjoying their home that they have

groomed and maintained over the years looking forward to spending their retirement years there.

We are confident that the previously agreed upon and approved five-lane concept is both possible and feasible and would have the least impact on our family's personal and business situation.

Please carefully consider our input and really study the alternative routes and how it would affect the lives of others. From our understanding, the route the goes behind our house affects far less residence than that of the proposed four-lane divided highway between us and the Reisenauer's.

M 25

Thank you for the opportunity to comment on the Thorncreek Road to Moscow project. Many of my comments are pertinent to many of the alternative routes presented, so I will state them now and throughout my comments.

I think the arbitrary breakdown of the 10 routes presented into Western, Central, and Eastern corridors should be re-evaluated. Each route should receive equal consideration regardless of its position on landscape. If three routes are the number of routes ITD wants to advance, they should pick the three routes that 'win' on the evaluation matrix. However, I think weighting each criterion on the 'alignment evaluation matrix' equally is wrong. Some criteria are obviously more important than other.

I am struggling with accepting the information as presented. For example, the length of road for the no action is 6.8 miles and C1 which straightens curves and reduces grades is longer in length at 7.3 miles. When ITD presented eastern routes a few years ago, they were touted as being 2 miles shorter than the existing route, yet now they are similar in length to existing route. I think all the distances are essentially the same except W1 and W3. I also have similar apprehensions about the safety, socio-economic, noise, visual analysis, plant and animal effects, and climate criteria.

Many alternatives will help traffic moving along Hwy 95, yet they will not allow access for the individuals in the vicinity to access the new highway. Many will be forced to alter their daily travel plans. Commuting either N or S for the people within the Thorncreek to Moscow corridor will be affected. Safety concerns for people getting 'picked up' by carpooling along a new alignment that does not allow access should be considered.

Carpool lots should be provided for any of the alignments that will limit access. For instance, if W1, W3 or any of the E routes are chosen a lot at Thorncreek Rd. should be provided. All routes should include a commuter lot on the N end of the project. Additional routes that strand people (add more than 1 mile to commuting especially considering carpoolers from different starting points) should provide lots. These lots need not be huge, just enough for a few cars.

The City of Moscow has started a ring road concept and all the alternatives should align with future travel corridors. Although Moscow may not merit a bypass for 20 years, it should be considered now.

I will address each alternative below:

W1 – I agree that this alternative should be eliminated due to cost, wetland, and prime farmland effects. I have no idea how this alternative with no private entrances or roads could score so high with safety based on turns. This route fails to serve the local community within the project area. I am not familiar with the CDC plant survey sites, but if there is decent Palouse Prairie, there may be habitat for the Giant Palouse Earthworm, Driloleirus americanus, which was recently rediscovered in Idaho fescue, snowberry association.

W2 – This route should only be selected if ITD feels they must have new highway without any access through the corridor. It does not use any of the existing infrastructures and does not serve the local community well. Provide commuter lots on both ends if selected.

W3 – This route also seems like a poor choice due to cost, length, not serving local community, impacting ungulates and plants, and destroying prime farmland. I agree with eliminating this alternative. I am not familiar with the CDC plant survey sites, but if there is decent Palouse Prairie, there may be habitat for the Giant Palouse Earthworm, Driloleirus americanus, which was recently rediscovered in Idaho fescue, snowberry association.

W4 – I like that this routes uses much of the existing highway and then avoids the high density of homes along the N end of the corridor. I prefer C2 because it avoids the wetlands W of the grain elevator. I think commuter lots would be nice, both ends. If we ever get a bypass around Moscow, this is the route to pick. But I like the C ones better.

C1 – I think this is my preferred route. I really feel for the businesses and people who might be displaced by widening the road. Worst might be those not 'impacted', but affected. I think it is wise to use the existing road and improve it. The local community will benefit and the road will be safer than no-action. I believe there will be fewer surprises with this route than any of the others. It is the cheapest and affects the least amount of prime farmland.

C2 – This route is in my top three choices (all the C ones). Again it uses the existing infrastructures and right of way. It is better than W4 because it avoids the wetlands along W4 N of Clyde Hill. I think there should be commuter lots on either end where new road leaves existing highway.

C3 – I like this route better than C2 because it is cheaper and uses more of the existing road than C2. I like that all the C routes have lower effect on prime farmland, do not disturb CDC plant survey sites, and have no identified ungulate habitat. I'm not sure I believe that this route's climate is more like the E routes than the other C routes.

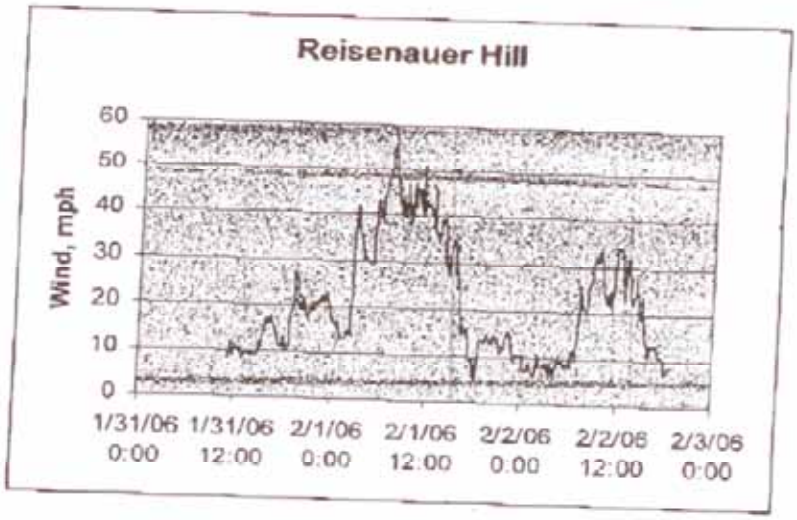
E1 – All of the E routes are bad. If any are selected commuter lots on both ends are needed. The E routes do not serve the local community and E1 splits two

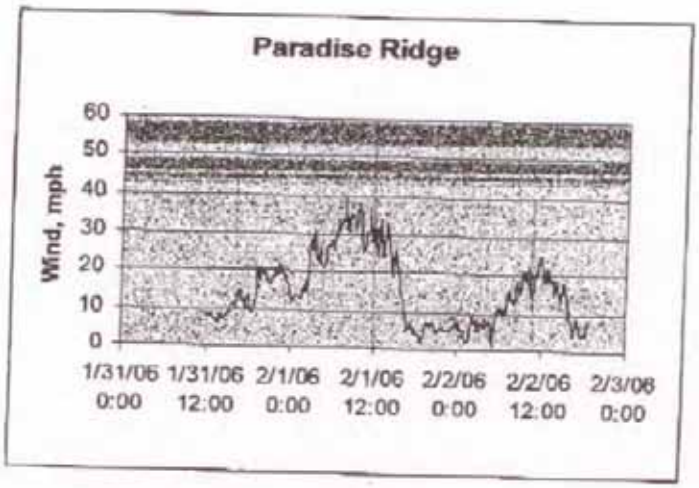
fairly high density housing areas on Eid Road. There are safety concerns about children playing and people accessing the highway via foot.

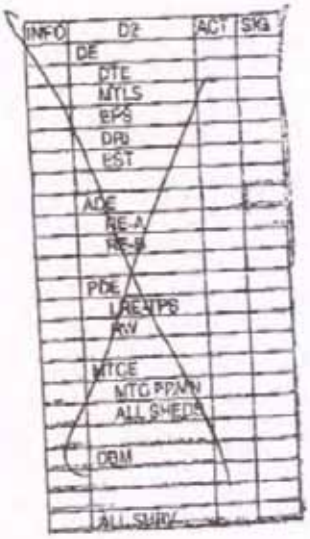
The E routes are all fairly close to the largest continuous patch of Palouse Prairie in Latah County. Weeds are one of the biggest threats to Palouse Prairie and roads are notorious corridors for weeds. There are prairie remnants on E routes that may be habitat for the Giant Palouse Earthworm. The recent worm collection was on a high elevation granitic outcrop with remnant Palouse Prairie, a landscape very similar to Paradise Ridge. This endangered ecosystem and associated plants and animals do not need any additional stresses from road construction. I think it would be prudent for ITD to drop these routes. I'm really surprised that the E routes disturb similar wetland area than C1. The wetlands along C1 are already disturbed.

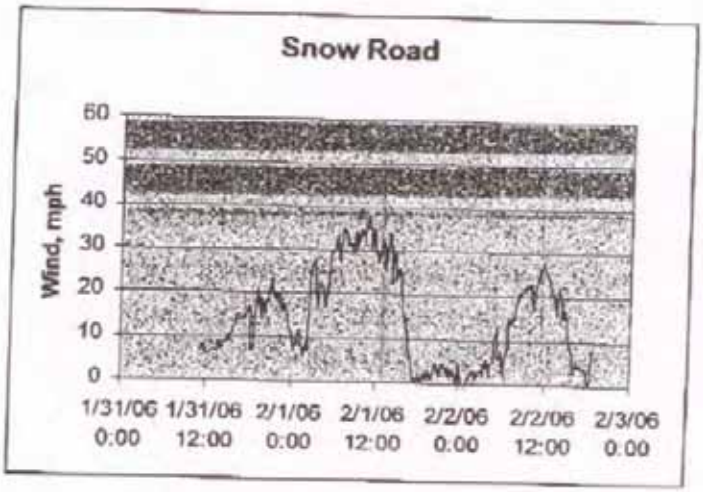
Why does ITD want to relocate a cell tower? That sounds expensive.

All of the E routes remain at higher elevation for longer and still have equally steep grade at N end of the corridor as an 'improved Reisenauer Hill' would have. I think the climate factors presented are misleading. Yes these routes have more fog, and probably less ice (be with recent de-icing services, is this as much of a concern as it was in past?), but there is definitely more wind. Below are three graphs from ITD weather stations for the last 3 days. I think building the highway on an exposed ridge location from Reisenauer Hill and then over a bridge crossing Eid Road with the winds this area experiences is crazy. Coupled with fog and more snow at elevation, it is a disaster waiting to happen. Note the Paradise Ridge weather station is not on the exposed area I am commenting about. I live on the ridge that adjoins Reisenauer Hill and I am very familiar with wind and snow events that have not been presented to public.









E2 – This route has similar concerns as E1 for me. I like that Hidden Village and Benson's trailer parks are not split. However I think effects on animals (pygmy nuthatch), ungulates, plants, and the possibility of encountering a rare species (Driloleirus americanus) are serious and may result in the type of surprise that grinds construction to a halt. Both ends should have commuter lots. There are safety concerns about residents accessing highway via foot for commuter travel.

E3 – The difference between E2 and E3 seem fairly small to me. In looking over the matrix, the number of displacements is different, but there are no homes where the two routes differ. Again I think effects on animals (pygmy nuthatch), ungulates, plants, and the possibility of encountering a rare species (Driloleirus americanus) are serious and may result in the type of surprise that grinds construction to a halt. Both ends should have commuter lots. There are safety concerns about residents accessing highway via foot for commuter travel.

M 26

Dear Mr. Helm
Regarding;
Project # DHP-NH-4110(156)
Key# 9294
Thorn creek Rd. to Moscow

Dear Mr. Helm
Regarding project # DHP-NH-4110(156)
Key # 9294 Thorn Creek Rd. to Moscow

Thank You for letting me voice my opinion on the new road between Thorn Creek Rd and Moscow. I am the eldest son of Gerald and Judy Reisenauer, There home and the home I grew up in is still a very important place in my life and the life of my children and my mom and dad's grandchildren. There have been many precious memories in the Reisenauer home. It has been the home of my parents for 47 years and was my home for 19 years.
I'm writing this letter to ask that you consider putting a 5 lane section with a turn lane for access to the house from Thorn Creek Rd to the top of Reisenauer hill. There is several 5 lane section of the road already in place with no problems to date.

M 27

Idaho Transportation Department
District Two
Attn: Ken Helm

Mr. Helm:

I am writing in regard to the proposed Thorn Creek to Moscow highway expansion.

I am greatly in favor of the western alignments. Even though most of the western alignments are longer and more expensive, I believe that, overall, they will be safer and less costly in terms of environmental, animal and, most important, human impact. I put a great deal of importance on the relocation of existing businesses and residences. With the exception of W4, no residences or businesses will need to be relocated. This is a huge factor. I personally favor W2 as it is straighter and shorter than the other western alignments.

Of the Central corridor, C3 seems to be the better alternative but it still displaces too many residents. It also appears to follow too much of the existing highway and I do not feel that this is a safe route, particularly around Reisenauer Hill where there have been too many fatalities over the years.

I do not favor any of the eastern alternatives. Paradise Ridge is a very special place in the Palouse and we do not need to degrade it any further. There would seem to be more environmental issues and a greater potential for loss of animal habitat with the eastern routes. Many people can confirm that throughout the winter, much of Paradise Ridge is enshrouded in fog. This will definitely be an encumbrance to drivers, particularly as the speed limit will be higher. I fear that there will be a great many more accidents should the eastern routes be chosen.

I do not know if enough thought has been given to the aesthetics of the eastern alignments. Paradise Ridge has been an inspiration to many thousands of people in Moscow and the surrounding environs. Pausing in the middle of a busy day and looking up and embracing the beauty of Paradise Ridge has been a pleasure for many. It is a local landmark that is relatively unspoiled by human hands. Keeping it unspoiled is the goal of many people. Placing a four lane highway anywhere close to Paradise Ridge would be an unnecessary sacrilege. I strongly urge you to eliminate the eastern alignments from consideration.

Thank you for your consideration.

M 28

GENERAL COMMENTS ON ENVIRONMENTAL STUDIES

US 95 Thorncreek Road to Moscow, Openhouse, 18–19 Jan 2006

I appreciate that ITD has attempted to provide more information to the public for comment on the future route of US 95 from Thorncreek to Moscow. The openhouse itself was professionally organized and completed. This is the type of process we should have had years ago.

My greatest concerns are with the validity of the data presented, how it was presented, and how it was subsequently used to development the Alignment Evaluation Matrix (AEM) and make "selections." It seems the more I scrutinize the reports, the less validity they show, and in some cases, it seems they have inherent bias, which troubles me.

I'm disappointed that ITD chose to choose, to recommend, 3 alternatives *a priori* to public comment at this openhouse. Whether intended to reduce options or not, it seems to me ITD indeed pushed its own agenda, again, directing bias toward routes. Wouldn't it have been okay to allow folks opportunity to comment on all 10 routes first, without any prodding in a particular direction? Why narrow the field to one from each corridor? That decision alone seems arbitrary and without merit. It is conceivable that the public could have pushed for inclusion of two central routes, two western routes, and zero eastern routes, or for that matter, only pushed for all three eastern routes, but may not have because the subconscious effort was toward three "pre-selected" routes that include ITD's favorite, E2. It comes even more troubling when routes within corridors are selected on some numeric basis that may or may not have any validity on the ground. An example, ITD touted rejection of E3 on their poster for several reasons, including its high prime farmland impact rating of 196, whereas E2 was okay with an IR of 194. Does a difference of 2 really mean anything significant? I wonder how many folks changed their commentary because ITD was perceived to have already made the decision without public input. ITD can say "all options are still viable" but actions speak louder than words.

For many of these studies, I believe there is a very big difference between gathering data with precision and gathering data accurately. ITD should have requested that each report follow a similar format for presentation of data, including an executive summary and a conclusion based on data collection. Evaluation and interpretation of reports is much more difficult when each is presented in a different format.

I was also dishearten to see a complete absence of integration of the studies (for example, impacts of noise on breeding habitats of species), and more discourage by a **complete lack of attention to cumulative effects** of each alignment. It seems like kernels were simply plucked from hear and there in each study and because of that, there is an inherent problem with the AEM. For many of the routes (all of the Ws, all of the Es) the existence of the old road is not factored into significant parameters like total right-of-way, total length of roadway, and potential accidents—what I mean is that if you add 6 miles of new highway and "give" NLHD 5 miles of old highway, the cumulative effect is 11 miles of highway in the county; ITD should just count the new 6!. In essence, only half the story of the "impact" of W and E routes is provided if the ongoing impacts of the old road are ignored.

Safety

What are the cumulative effects on safety by leaving the old highway, or portions of it, in use? Selection of a W or E routes puts most of the high-population center of Hidden Village on the old, unsafe highway. What are cumulative effects?

Climate

Precision versus accuracy. I have no doubt that the data for climate was collected precisely, but I believe, in terms of long-term accuracy, it is flawed. That extremely short collection interval (made even more discouraging that it took so long to put the monitoring into place, despite the fact that ITD knew this was a key issue) that encompassed an aberrant winter makes some of the conclusions dubious. It's common knowledge that cold air flows downhill, so I'm not surprised that the WC showed precipitous changes in air temperature. Unfortunately, because of the abundance of clear weather (no precipitation events) last winter/spring, and because clear skies promote radiant cooling, the occurrence of such events was no doubt more frequent than if a more typical weather pattern with more precipitation and less radiant cooling had been in place. This should reduce the number of hours of "road ice" conditions (unfortunately, the AEM doesn't note that the data was only for Jan-Mar of ONE YEAR). That results in goofy statements like: *The importance of the similarity in number of hours of freezing temperatures in January among the three sites is that it illustrates that during stormy winter conditions, one can expect similar durations of freezing temperatures across the study area.* The state climatologist should drive from Moscow to my home during each winter event to see the lunacy of that statement. Just days before the openhouse we had the more typical event: rain along US 95 from the Eid Road intersection to Moscow; several inches of snow at my house. Snow persists longer at higher elevations.

Noise

My first reaction to reading this was that it was something that could have been done by a fifth grader for science fair. Simply counting dots within 300 feet of the proposed alignments is simplistic and useless. Topography would play a huge role in noise transmission. And, if you are currently further than 300 feet from US 95, and it moves significantly closer to you, although the sound may not be "debilitating" it will negatively affect quality of life. For instance, residents of Hidden Village are currently buffered from the highway by topography (it's called "hidden" for a reason). But having the noise reverberate off a four-story tall bridge above them will drastically, and negatively, affect noise levels. This couldn't be modeled? Further, it makes me a bit angry that this report didn't look at NEW noise receptors. If you already live along the highway than additional highway, at least with current travel loads, you already have that impact by choice. If it's a new receptor, you acquire that additional noise without choice.

Environmental Justice

I have the most problems with this study.... it's poorly written, appears biased, presents no relevant data for several key parameters, and, I think, shows the author's ignorance of the alignments. Oh, and it doesn't look at any cumulative effects either.

The author writes: *The land use inventory is inclusive of the southern boundary of the corridor, where Thorncreek Road intersects U. S. 95 near milepost 337 (Picture 4). From that starting point to the intersection of Eid Road and U. S. 95 south of mile post 340, the land use abutting the corridor is entirely agricultural.* ***Most of the land abutting Eid Road is also agricultural. There are several clusters of housing, including singlefamily dwelling units and mobile homes, scattered along Eid Road.*** Hello? The first 0.75 of a mile of Eid Road is lined, on both sides, by Hidden Village and Benson's.

The Delphi Process. It's suppose to be a group with a diverse expertise, but 30% of the group were "roadway" people. It's suppose to be a report on ENVIRONMENTAL justice, but there was no representation by anyone "green." With Palouse Clearwater Environmental Institute, Friends of the Clearwater, Palouse Prairie Foundation, National Audubon, Latah Wildlife Society, Palouse Land Trust all local groups, not a suitable person with an environmental background could be included? But a hospital CEO is okay to speak to transportation issues? (I'm not knocking the stature or abilities of the CEO, but that inclusion seems more a stretch to me than having anyone with an environmental insight.) Incredulous.

The author concludes that no "disproportionate impacts on minorities and lower-income populations" but never presents data to substantiate that conclusion. Moreover, the author shows (Table 14) that Hidden Village/Benson would be adversely impacted by C alternatives. I can't image how that could be, unless ITD is planning on tearing out the sewage ponds. I would assume any new construction at the intersection of Eid would go west, and not impact the community. Does this author have any clue where the boundaries of Hidden Village/Benson really are?

And finally, maybe I'm being overly sensitive. But this author seems to be inconsistent with data presentation and mitigates (omits) negative comments toward eastern routes and especially E2. Why do I say that? Critically read the author's descriptions of the eastern routes and the central routes. All of the central routes discuss relocations, none of the eastern routes have it mentioned, even though displacements for E2 are higher than for C2 or C3. In addition, for eastern routes, the author specifically mentions the need for a bridge over Eid Road for E1, and E3, but fails to mention it for E2. And, how can E2 and E3 differ in terms of impact to "residential areas" when they both follow nearly the same route when impacting the residential area of Hidden Village/Benson? It is essential that all of the environmental reports provide data in an objective, unbiased, balanced way. This report doesn't do that.

Finally, as I write this, rumor is that the University of Idaho is going to report "rediscovery" of the giant Palouse earthworm. This holy grail of the Palouse Prairie ecosystem is so rare one hasn't been reported for decades. This species is one that could quickly be a player in protection of remnant prairie patches and the native vegetation that buffers them. Because all of the routes meet project objectives, this is just another good reason to dump the eastern routes and focus on central routes because C2 and C3 maximize use of existing highway and minimize negative impacts to residents of the densest population centers in the corridor, minimize negative impacts to native vegetation, minimize negative impacts to sensitive animal wildlife, and minimize impacts to ungulates.

If, in order to meet project objectives, it is unnecessary to force negative impacts on the residents of Hidden Village/Benson and native vegetation and wildlife, why do it?

WESTERN ALTERNATIVES/ALIGNMENTS

US 95 Thorncreek Road to Moscow, Openhouse, 18–19 Jan 2006

1. W1. I concur, eliminate from further consideration.
2. W2. I concur, eliminate from further consideration.
3. W3. I concur, eliminate from further consideration.
4. W4. I disagree, this route should be eliminated from further consideration too.

I do not believe any of the western routes should be carried forward.

The new roadway should maximize use of the existing roadway, and where not possible because of dense population centers, new roadway should remain as close as possible to the existing highway "footprint," thereby keeping new disturbance near old disturbance. Along the same vein, new roadway right-of-way should be kept to a minimum. Disturbance, or potential disturbance, to native vegetation, sensitive animal wildlife, and ungulates should be avoided. The two areas of highest population density, Valhalla and Hidden Village/Benson, should be avoided.

The western routes have advantages in that they avoid the high population centers and are fairly benign to sensitive animal wildlife and ungulates, but...

W1, W2, and W3 fail the criteria for maximizing use of existing roadway;

W1, W2, and W3 require large amounts (the largest amounts) of new right-of-way;

W3 has negative impacts on native vegetation.

Although W4 makes the best use of existing roadway in the western corridor, in my opinion, it fails the disturbance test by going needlessly further west than necessary. By circumventing Clyde Hill to the west this route will have higher visibility to SW Moscow and, in particular, the UI Arboretum. C2, which is similar to this route, is a better choice in that the new roadway is closer to the existing footprint, is shorter, requires less total right-of-way, has less wetland acres, and has similar relocations and prime farm land ratings.

CENTRAL ALTERNATIVES/ALIGNMENTS

US 95 Thorncreek Road to Moscow, Openhouse, 18–19 Jan 2006

1. C1. I concur, eliminate from further consideration.
2. C2. I disagree, this route should be included for further consideration.
3. C3. I concur, this route should be included for further consideration.

I believe that C2 and C3 should be carried forward.

These proposed routes maximize use of the existing roadway, and where not possible, the new roadway remains very close to the existing highway "footprint," thereby keeping new disturbance near old disturbance. These proposed routes require some of the lowest amounts of new roadway right-of-way. These proposed routes avoid disturbance, or other potential negative impacts on native vegetation, sensitive animal wildlife, and ungulates. Both routes avoid the Hidden Village/Benson communities, but unlike the W and E routes, allow residents of Hidden Village/ Benson better access to the new highway. C3 adds no new impacts that Valhalla isn't already accustomed to by the current highway, and C3 also has the advantage of using even more existing roadway than C2. C2, however, avoids Valhalla and the rest of access points north to Moscow. Selection of C2 or C3 would also cause new development to occur in an area where most development already exists. I also doubt that C3 would have 40% more incidence of fog compared to C2. Again, this goes back to my precision vs. accuracy discussion I provide under comments to the environmental studies.

Either C2 or C3 would be the best route because they:

Maximize use of existing roadway (C3 even more than C2).
Keep new disturbance near existing disturbance (keep new development near existing development).
Create no new negative impacts on existing densely populated locations (C2 avoids altogether).
Avoid disturbing, or potentially disturbing, native vegetation, sensitive animal wildlife, and ungulates.

EASTERN ALTERNATIVES/ALIGNMENTS

US 95 Thorncreek Road to Moscow, Openhouse, 18–19 Jan 2006

1. E1. I concur, eliminate from further consideration.
2. E2. I disagree, this route should be eliminated from further consideration.
3. E3. I concur, eliminate from further consideration.

I do not believe any of the eastern routes should be carried forward.

The new roadway should maximize use of the existing roadway, and where not possible, new roadway should remain as close as possible to the existing highway "footprint," thereby keeping new disturbance near old disturbance. Along the same vein, new roadway right-of-way should be kept to a minimum. Disturbance, or potential disturbance, to native vegetation, sensitive animal wildlife, and ungulates should be avoided. The two areas of highest population density, Valhalla and Hidden Village/Benson, should be avoided.

E1, E2, and E3, do not maximize use of existing roadway, particularly when compared with C3.
E1, E2, and E3 require much less total right-of-way, and new right-of-way, when compared with C3, in particular.
E1, E2, and E3 have, even in terms of the shoddy environmental justice report, the only "impacts" of any of the 10 alignments. Whether or not these impacts are "disproportionate" is somewhat irrelevant. **The negative impacts to this community are unnecessary**. Any of the other 7 routes meet project objectives without causing impacts to any portion of the community (in this context).
E1, E2, and E3 have some of the highest IR ratings.
E2 and E3 are the only routes that negatively impact habitat for sensitive animal wildlife.
E2 and E3, like W1 and W3, are the only routes that negatively impact habitat for ungulates.
E1 and E3, like W1 and W3, are the only routes that negatively impact critical plant habitat. However, the E2 route negatively impacts native vegetation critical for sensitive animal wildlife, and abuts, and therefore has higher potential, to negatively impact critical native vegetation through vectoring of weeds. Moreover, the native plant report points out that the hawthorn/cow parsnip habitat type is critically imperiled. I was disappointed that the large hawthorn tract in direct line of E2 and E3 wasn't identified in the report, particularly since it abuts Tributary U, and because of the scarcity of this important wildlife component within the corridor. No disrespect intended for the author, but I wonder if this is an omission or an error.

Looking at the AEM, all routes are fairly similar for nearly all parameters with these exceptions: negative impacts, in terms of environmental justice, to residents of the Hidden Village/Benson community, and negative direct and indirect impacts to native vegetation, and habitat for sensitive animal wildlife and ungulates. **Removing all of the eastern routes (and W1 and W3) therefore removes all of these unnecessary negative impacts**.

Moving forward with C2 and C3 achieves the project objectives, maximizes use of the existing roadway but where that is not possible, places new roadway close to the existing highway "footprint," thereby keeping new disturbance near old disturbance. C3 requires less new right-of-way than any of the three eastern routes. C2 and C3 avoid direct and indirect disturbance to native vegetation, sensitive animal wildlife, and ungulates.

M 29

Principle:

Having lived on Hwy 95 for the past 15 years, it is obvious why we need a new highway and we do need a new highway. The traffic volume, multiple use nature of the highway and accident and near accident rates (close misses) is such that the existing highway is antiquated. The existing highway and that part of it in Latah Co. ties into a much larger project running from border to border. The new highway should be built to reflect this new highway and not just be a modification of the existing highway. Ideally, a new highway should be built with as limited access as is possible and utilize land of poor quality.

Choice of alignments and criteria:

1. Safety concerns of alignments are not adequately defined by initial studies. We believe safety of both driver and residents should be of high if not the highest priority of the highway 95 project, otherwise, what is the point of the project? Even though it is difficult for one to judge costs since land accession costs have not been figured into overall project costs as stated in the matrix, how does one translate lives saved into dollars spent or in other words, is a life saved worth 4 million dollars? Of course it is. While it is not clear whether the safety of residential drivers was taken into consideration it would seem obvious that the alignment with the least number of entering and exiting drivers, and farm implements (ie. access points) would lessen the chance of accident. The route with the lowest accident safety rating means more than just driver safety, i.e. safety of resident's access along the highway should be part of this formula.

2. Land use objectives:

This area of Idaho is primarily agricultural and great care must be taken to preserve our highest quality agricultural lands. It is next to impossible to tell from matrix analysis and IR ratings the quality of overall farmland, though it is well known that the eastern routes cross primarily land of poor quality whose use has already been relegated to CRP land. Central and western alignments cross land of high quality and will further split up existing farms, complicating farming practices and creating additional safety hazards. Agricultural organizations all over the country and in Idaho are very concerned about the loss of prime farmland.

3. Residential impacts:

Residential impacts, particularly north of Merickel residence (and potentially south) have not been evaluated enough on route C-3 (or C-1). Three relocations seem to be an underestimation. How will noise and hazardous waste criteria be used for determining impacts on remaining residences? What qualifies as a residence on all the routes? Mobile homes, permanent homes, absentee owners, renters, or what? The overall objectives of a new highway is NOT met with any of the C-alignments, i.e. there will still be many access points creating safety hazards.

4. Plant survey:

No E & T species found on any of the routes, though area encompassed by western routes appears not to have been sampled intensively. Additionally, some concern exists regarding the choice of consultants in as much as ITD is to be commended for choosing independent consultants in most of the studies with the exception of this one, i.e. conducted by someone living on Paradise Ridge – i.e. conflict of interest.

5. DELPHI Project:

DELPHI project is not an appropriate tool for this area of Idaho. Area is too small and known, vested interests of those chosen to participate suspected. Placement of highway should be governed by safety concerns and the impacts it has on people and not the potential to induce development.

6. IR prime farmland:

The IR prime farmland rating is unclear. Land to the southeast of Moscow near Paradise Ridge is of lower quality farmland than that on either the C or W routes and yet the ratings are actually higher on the eastern alignment. Is the rating one of just more land of lower quality or how was this calculated? Some of the most productive farmland in the area is located on alignments C and W and should be avoided. Productivity (yield) ratings of land use were evidently not used in this computation.

General:

Alternate route or bypass of Hidden Village: It appears as though all direct residential impacts on E-2 are at Hidden Village. If a slight realignment in this area could be found, this is a much-preferred route for all of the factors mentioned above. In evaluating residential impacts, I cannot point a finger to a route and thereby condemn another person's home, like so many have done here. However, if a connector between routes or realignment in this area can be found, thereby reducing or eliminating the loss of residence, E-2 is a much-preferred option. It is our understanding that the residents in this area actually want to relocate or are uncaring of the dislocation. In this case, every effort possible should be made to provide adequate financial remuneration for them to do so. Environmental concerns appear to be mitagatable, in as much as no E & T species are represented on any of the alignments.

I feel that a small number of Moscow citizens have effectively polarized this project and Moscow citizens in general by biased and jaundiced tactics, i.e. **"Don't pave paradise" bumper stickers** and the strong-arming of weighted opinion. This group had made little effort to work with ITD and even less concern appears to have been made to address the real reason for this project which is SAFETY. The citizens for a safe highway 95 have at least shown a desire to work with ITD in the design of the highway to accommodate as many interests as possible, i.e. transportation, commerce, and agriculture. One resident business owner even refused a contractual offer in the design of the highway because of the potential appearance of a conflict of interest, as opposed to the person in item 2 above.

If it is not abundantly clear from the above, we support route E-2 that mitigates wildlife issues (i.e. wildlife watering pond) and wetland or eyebrow protection. The eastern alignments are the only options that meet the rationale and requirements for a new generation highway system. And, regarding view, it would be nice if someone brought up the view drivers might have as they drive north and see Hog Heaven for the first time. Perhaps even a rest stop can be provided on top for drivers to stop and view Moscow and Moscow Mtn. and if a name is needed for it, one suggestion might be the Harris Rest Stop.

Thank you for your consideration and we look forward to working with you on this important project for Latah Co. and the state of Idaho.

M 30

Dear Ken Helm,

I live in Moscow and I work in Lewiston. I drive highway 95 year round, five days a week, rain or shine, day or night. I am not interested in a brand new highway – I just want a decent ~~round~~ ROAD and some good regional public transportation.

I can't believe the routes to the east even came up for serious consideration. Anyone who has driven that road on a regular basis knows that moving east of 95 means moving into heavy fog. Any of the eastern routes are just dangerous, not to mention that they come too close to paradise ridge – one of the few areas left where one can go an not be assaulted with the sound of traffic.

I feel more or less the same way about the western routes, but for different reasons. Why do we need to build new roads – as opposed to work with the one we have? Of the plans I saw C-1 is the only one that I could support. It works with what we have.

Like I said, I drive this road in order to get to work and in order to get home, 5 days per week. I do not want money spent on new highways, I'd rather see it spent on public transportation.

M 31

Comment on ITD environmental studies and alternative selections, U.S. 95 Thorncreek Road to Moscow

Each of the alignments except C1, which follows the current alignment, would leave some length of existing U.S. 95. These sections will continue to be used for local traffic, including school buses. The supposed justification for the highway upgrade is that the existing U.S. 95 is unsafe. If you build a new U.S. 95 on a different alignment, you have not solved the problem. The remaining sections of existing U.S. 95 will still be unsafe. This is extremely significant.

You have recommended that alignment C1 be eliminated from further consideration partly due to a relatively high projected accident rate (14.59 accidents per year). My calculations for each alignment (considering varying amounts of traffic for new alignments, reworked existing alignments, and remaining existing highway) indicate that C1 would have the **lowest** total accident rate of any alignment (Eastern alignments increase from about 11 to 15.24; Western routes increase from 12 or 13 to 17 or 18). ITD must include estimates of the accident rates along remaining existing U.S. 95 sections for each alignment. This type of calculation must be included in the EIS; as your induced development study says (p. 34), an **EIS must study reasonably forseeable effects.**

The Eastern alignments would destroy or threaten more remnant native plant communities, require more mitigation effort for big game animals, produce higher cuts and deeper fills, and result in more total length of highway in the county than would the central alignments. Latah County is already very near the high end for amount of roads compared to other counties in Idaho. In addition, the Eastern alignments cause the only disruptions to sensitive wildlife species.

All of the Eastern alignments harm Palouse Prairie ecosystems. They take out a Palouse Prairie remnant near Cameron Road and Conservation Data Center (CDC) Plant Survey sites at the southern end of the alignments. The U.S. Geological Survey ranks Palouse Prairie as one of the most endangered ecosystems in North America. Just this week a positive identification was made of a giant Palouse earthworm (*Driloleirus americanus*) found in prairie habitat. This earthworm, is on the International Union for Conservation of Nature and Natural Resources (IUCN) critically endangered species "red list" (www.redlist.org/search/details.php?species=6828) , and has been found only in the Palouse. The previous sighting (around 1987) was in a forested area near Moscow. These discoveries provide added emphasis to protect the prairie grasslands and the forested pockets in the Eastern corridor. The giant Palouse earthworm was not included in the 'species of concern' study, but it should be.

According to the matrix, no CDC plant survey sites are impacted with alignment E2. However, the CDC sites—G3(2), H4(2) and H3(4)—near the southern end appear to be impacted by alignment E2 as much as they are by alignment E3. All three Eastern alignments would have a direct impact on important remnants of Palouse Prairie. Most of the remnants in the project area appear to be suitable habitat for *Silene spaldingii* (G2/S1, threatened). All remnants contain populations of target species, and because all remnants (except the Paradise Ridge CS) are very small, any decrease in size or condition can be expected to further degrade the genetic base and threaten the long-term viability of the population.

Direct effects to a remnant complex translate into the "taking" of the entire remnant because of the remnants' small size and the imminent threat from weeds. Further, direct effects to any remnant complex, other than Paradise Ridge CS, should be considered a taking of any species of concern supported by the remnant. Because the habitat is specific and extremely limited, the decrease in habitat size, combined with potential indirect effects of weed introduction, will likely result in loss of plant populations over the relatively short term. [Lichthardt: Biological Evaluation

of Plant Species and Communities of Conservation Concern in the U.S. Highway 95—Thorncreek Road to Moscow—Project Area]

Lichthardt states that Alignment E3 intercepts two moderately valuable remnants. Based on plant biodiversity alone, alignment E3 would be the least desirable alternative.

The biological assessment declares that there is 'no effect on threatened and endangered species.' Although there may not be a direct threat, the project will both directly and indirectly affect potential habitat for T&E species, and the effect will be greatest along the eastern alignments. This rare habitat should be protected for possible inclusion of species of concern.

Section III (Environmental Baseline) of the biological assessment does not mention the Palouse Prairie. It fails to establish the importance of the Palouse Prairie ecosystem in the project area.

All Eastern alignments are detrimental to the habitat of two species of concern, the pigmy nuthatch and the long-eared myotis bat. The Central and Western alignments are deemed OK. These species use the Ponderosas along the Eastern alignments. Therefore, it is recommended that ITD avoid construction that disrupts existing Ponderosa pine stands (that is, avoid E1, E2, and E3). [Melquist: Biological Evaluation on the Potential Impacts of Corridor Alternatives From Thorncreek Road to Moscow on Long-Eared Myotis and Pygmy Nuthatches]

The Eastern alignments are in bunchgrasses and ponderosa pines, which are valuable to wildlife. Western alignments would have no loss of wildlife habitat, but E2 and E3 would. Without mitigation, any Eastern alignment would have increased highway mortality. Collective impacts diminish as one goes from Paradise Ridge to the west; cumulative effects should not be a factor for Western or Central alignments. [Melquist: Biological Evaluation on the Potential Impacts of Corridor Alternatives From Thorncreek Road to Moscow on Large Ungulates]

Wildlife crossing structures and warning signs are recommended for all three corridors, but the eastern alternatives (E1, E2, E3) would require the most wildlife mitigation expenditures, including purchase of "security habitat" to guide animals to crossing routes, fencing, wildlife exit ramps to allow trapped animals to escape the roadway, and addition of other ground to mitigate habitat loss.

Each of the eastern alignments would have a truck escape route gracing its descent into Moscow. The ungulate and species of concern studies both recommend against any eastern alignment. E1 and E2 tie for second-largest number of displaced or relocated businesses. Prime farmland impact for the eastern alignments is higher than for any of the central alignments, and higher than that for W4. The eastern alignments have the most impact to minority or low-income populations.

Paradise Ridge is a significant landmark near Moscow, and it is enjoying new conservation protection. The eastern alignments would have a high visual impact to this landmark and diminish the possibility of continued increases to conservation protection.

For all of these reasons, if any alignments are to be dropped from further consideration at this point, then all three Eastern alignments should be dropped.

Each potential US 95 alignment should be analyzed on its own merits without prejudgment based on its corridor. An Environmental Impact Statement is supposed to present a broad range of alternatives. The alternatives ITD is proposing to move forward are being limited based on geographical location.

In addition, a broad range of road designs should be presented in the EIS. All of the action alternatives are four-lane divided highways. ITD should present options for a non-divided highway with passing and turn lanes. It should be noted that the ungulate study emphasized the detrimental nature of divided ("twinned") highways. Especially at the edge of town, we need to have an attractive roadway that enhances Moscow rather than dominating it with a huge roadway. Colorado makes their highways fit in to the landscape better, curve as needed, have attending reduction in speed limit as needed, and allow smaller cuts and fills.
Montana's US 93 near Flathead Lake is a new 2-lane with passing and turn lanes as needed.

Whatever its location, it is prudent to reduce the highway's 'footprint' as much as possible to reduce its environmental impact. Such a design would be more compliant with the Federal Highway Administration's 'context sensitive design' guidelines. Placing the highway in the central corridor would best comply with the Environmental Protection Agency's guideline to maximize use of existing infrastructure by reusing the corridor rather than turning more farmland or prairie grassland into another transportation corridor. It also would not add to the number of transportation corridors, a documented positive move (see the ungulate report).

I find it interesting that the visualizations (fly-overs) all showed the view as if traveling from south to north, so that the visual effect of the approach of the alternative alignments as seen from the population center of Moscow would not be shown.

I respectfully request that ALL EASTERN ROUTES BE REMOVED FROM FURTHER CONSIDERATION.